



**Part II Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶  
See attached Form 8937 Appendix A

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18 Can any resulting loss be recognized? ▶ See attached Form 8937 Appendix A

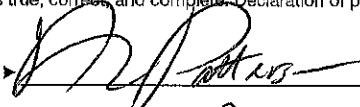
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19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶  
See attached Form 8937 Appendix A

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Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature ▶  Date ▶ 1/13/17

Print your name ▶ ALAN PATTERSON Title ▶ DIRECTOR - TAX

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.