

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ IRC SEC 301(C)(2)

18 Can any resulting loss be recognized? ▶ NO

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ REPORTABLE TAX YEAR IS 2015

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 ▶ 3/30/16

Print your name ▶ JOHN W. BARBAN

Title ▶ CFO

Paid Preparer Use Only

Print/Type preparer's name JOHN W BARBAN	Preparer's signature 	Date 03/16/16	Check <input type="checkbox"/> if self-employed	PTIN P01234031
Firm's name ▶ ERNST & YOUNG U.S. LP		Firm's EIN ▶ 34-6565596		
Firm's address ▶ 5 TIME SQUARE, NEW YORK NY 10105		Phone no. 212-773-3000		