

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Internal Revenue Code Sections 702, 301 and 316.

18 Can any resulting loss be recognized? ▶ No loss is recognized by the shareholders at the time of the non-taxable return of capital distributions are received. The shareholder's cost basis should be adjusted to reflect the return of capital distributions which may affect the gain or loss recognized by the shareholder on the subsequent disposition of shares.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The non-taxable return of capital distribution information provided above will be reflected on the shareholder's Form 1099-DIV in Box 3, nondividend distributions, to the extent the form is applicable for the shareholder for the 2020 calendar year. The amount on Form 1099-DIV may vary from the amount disclosed in this form 8937 as year end information is obtained and final calculations are determined for Form 1099-DIV.

Sign Here 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.

Signature ▶  Date ▶ 3/31/2020

Print your name ▶ Edward T. Gallivan, Jr. Title ▶ Chief Financial Officer

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|-------------------------------|----------------------------|----------------------|------|---|--------------|
| Paid Preparer Use Only | 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. |