

Part II Organizational Action *(continued)*

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based _____

▶ Sections 301(c) and 316(a) of the Internal Revenue Code.

18 Can any resulting loss be recognized? ▶ N/A

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ None

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 ▶ /S/ K. Phil Yoo Date ▶ 09/20/2019

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|-------------------------------|--------------------------------------|----------------------|--|---|------|
| Paid Preparer Use Only | Print your name ▶ <u>K. Phil Yoo</u> | Preparer's signature | Title ▶ <u>Chief Accounting Officer, VP Accounting</u> | Check <input type="checkbox"/> if self-employed | PTIN |
| | Print/Type preparer's name | | Date | Firm's EIN ▶ | |
| | Firm's name ▶ | | | Phone no. | |
| | Firm's address ▶ | | | | |