



**Part II Organizational Action** (continued)

**17** List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ \_\_\_\_\_  
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**18** Can any resulting loss be recognized? ▶ \_\_\_\_\_  
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**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ \_\_\_\_\_  
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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 ▶ /s/ Paul J. Krug Date ▶ January 13, 2017

|                               |                            |                      |         |   |      |
|-------------------------------|----------------------------|----------------------|---------|---|------|
| <b>Paid Preparer Use Only</b> | Print your name ▶          | Preparer's signature | Title ▶ | 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 ▶           |                      |         |   |      |