

Part II Organizational Action (continued)

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

Tax free reorganization under IRC 368(a)(1)(D).

18 Can any resulting loss be recognized? ▶ _____

Tax free reorganization under IRC 368(a)(1)(D) and no gain or loss is recognized.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ _____

N/A

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 ▶ _____

Print your name ▶ Emily Washington

Title ▶ Treasurer

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	<u>Kevin Collins</u>				<u>P00392866</u>
	Firm's name ▶ <u>State Street Corporation</u>	Firm's EIN ▶ <u>04-1867445</u>		Phone no. <u>617-662-1520</u>	
	Firm's address ▶ <u>200 Clarendon Street, 3rd Floor, Boston, MA 02116</u>				