

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 305(c)

18 Can any resulting loss be recognized? ▶
No.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶
The adjustment relates to calendar year ending December 31, 2025.

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 ▶ Joseph J. Bramuchi Date ▶ Jan 5, 2026
Print your name ▶ Joseph J. Bramuchi Title ▶ Vice President

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.			