



**Part II Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ IRC Section 301(c)(2) provides that the portion of a distribution which is not a dividend shall be applied against and reduce the adjusted basis of common stock.

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

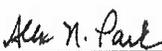
19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ N/A

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 ▶ 1/15/15

Print your name ▶ Todd Sakow Title ▶ CFO

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Alex Park		01/14/15		P00134487
	Firm's name ▶ Ernst & Young U.S. LLP	Firm's EIN ▶ 34-6565596		Phone no. 404-874-8300	
	Firm's address ▶ 55 Ivan Allen Blvd., Suite 1000, Atlanta, GA 30308				

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054