

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ **Section 354(a)(1) & (2), 356(a)(1), 356(c), 358(a)(1) & (2), 368(a)(1)(E), 1001(a) & (b) , and 1273(b)(3). Treasury Regulation Section 1.1273-2(b)(1).**

18 Can any resulting loss be recognized? ▶ **A U.S. holder that exchanges Existing Notes for New Notes in an exchange treated as a recapitalization generally will not be permitted to recognize any loss on the exchange.**

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ **The exchange occurred during calendar year 2017.**

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 ▶ *David Campen* Date ▶ *1/11/18*

Print your name ▶ **David Campen** Title ▶ **Asst. Controller & Vice President - Tax**

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 ▶		Phone no.	
Firm's address ▶				