



**Part II Organizational Action** (continued)

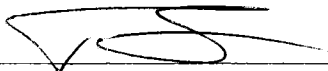
17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ IRC Section 301(c)(2)  
provides that the portion of a distribution which is not a dividend shall be applied against and reduce the adjusted basis of common stock.

18 Can any resulting loss be recognized? ▶ No

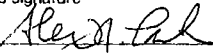
19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ These organizational actions were for calendar year 2013 and effective each of the dates described on line 15.

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 ▶ 1/29/14

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
	<u>Alex Park</u>		<u>1/17/14</u>		<u>P00134487</u>
	Firm's name ▶ <u>Ernst &amp; Young U.S. LLP</u>	Firm's EIN ▶ <u>34-6565596</u>		Phone no. <u>404-874-8300</u>	
	Firm's address ▶ <u>55 Ivan Allen Blvd., Suite 1000, Atlanta, GA 30308</u>				

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