

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 312 AND 301(c)(2)

Multiple horizontal lines for listing applicable Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ NONE

Multiple horizontal lines for providing information regarding loss recognition.

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

Multiple horizontal lines for providing other necessary information.

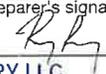
Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature ▶  Date ▶ _____

Print your name ▶ BRANDON HETZEL Title ▶ CFO

Paid Preparer Use Only

Print/Type preparer's name <u>RONY RODRIGUEZ</u>	Preparer's signature 	Date <u>1/15/26</u>	Check <input type="checkbox"/> if self-employed	PTIN <u>P01298427</u>
Firm's name ▶ <u>COHNREZNICK ADVISORY LLC</u>			Firm's EIN ▶ <u>33-3709623</u>	
Firm's address ▶ <u>707 WILSHIRE BLVD, STE 4950, LOS ANGELES, CA 90017</u>			Phone no. <u>310-843-9700</u>	