



**Part II** **Organizational Action** *(continued)*

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ [See attached](#)


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18 Can any resulting loss be recognized? ▶ [See attached](#)

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19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [See attached](#)

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<b>Sign Here</b>	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.			
	Signed by:  Signature ▶ _____		Date ▶ 5/6/2026	
<b>Paid Preparer Use Only</b>	Print your name ▶ Jay Crystal		Title ▶ CEO	
	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 ▶				