



**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 §354(a) – no gain or loss is recognized if stock in a corporation is exchanged solely for stock in the same corporation pursuant to a reorganization.

• IRC §358(a) – No change in tax basis of the shares received in exchange for the shares surrendered

• IRC §368(a)(1)(E) – Reverse stock split is a “recapitalization” type of corporate reorganization, which has tax-free treatment.

**18** Can any resulting loss be recognized? ▶ No

**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ \_\_\_\_\_

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 ▶ /s/ Bradford Towne Date ▶ January 14, 2026

<b>Paid Preparer Use Only</b>	Print your name ▶ <u>Bradford Towne</u>	Preparer's signature	Title ▶ <u>Principal Accounting Officer</u>	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶	
	Firm's address ▶				Phone no.	