

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. SEC. 301(c)(2)

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 ACTIONS ARE EFFECTIVE ON THE DATE OF DISTRIBUTION IDENTIFIED ABOVE.

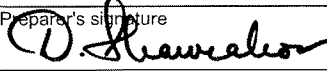
Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature ►  Date ► 1/28/16

Print your name ► _____ Title ► _____

Paid Preparer Use Only

Print/Type preparer's name DMITRIY SHAMRAKOV	Preparer's signature 	Date 01/28/16	Check <input type="checkbox"/> if self-employed	PTIN P01277339
Firm's name ► PRICEWATERHOUSECOOPERS LLP	Firm's address ► 300 MADISON AVENUE, NEW YORK, NY 10017		Firm's EIN ► 13-4008324	
			Phone no. 646-471-3000	