



**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 ▶ *Liou Guo* Date ▶ 1/27/17  
Print your name ▶ Liou Guo Title ▶ VP

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	DMITRIY SHAMRAKOV	<i>D. Shamrakov</i>	01/27/2017		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