

Part II Organizational Action *(continued)*

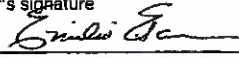
17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► IRC SEC 301(a); 301(b) AND 301(d). THE SHARES WERE DISTRIBUTED FROM THE CORPORATION AS A NONLIQUIDATING DISTRIBUTION WITH RESPECT TO THE SHAREHOLDERS' STOCK IN THE CORPORATION.

18 Can any resulting loss be recognized? ► N/A

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► June 30,2021

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 ► X  Vanessa A. Napoli  Sergio Diaz Monnier
Apoderada Apoderado
 Date ► X 12/13/2020
 Print your name ► X Title ► X

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	EMILIO ESCANDON	<u>X</u> 	<u>X</u> 12/14/20		P00647026
	Firm's name ► MBAF CPAS LLC	Firm's address ► 600 Third Avenue, 3rd Floor NEW YORK NY 10016		Firm's EIN ► 13-3842744	Phone no. 212-576-1400

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054