

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 Section 368\(a\)\(1\)\(E\) - recapitalization, Section 354 - exchanges of stock and securities in certain reorganizations, Section 358 - basis to distributees, Revenue Ruling 72-57](#)

18 Can any resulting loss be recognized? ▶ [The 1 for 10 Reverse Stock Split should not constitute a taxable transaction, except to the extent cash was received for fractional shares. Stockholders should consult their tax advisor to determine the tax impact of this transaction with respect to their individual facts and circumstances for tax year 2023.](#)

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [The reportable year in which the Reverse Stock Split occurred is 2023.](#)

[The information set forth in this Form 8937 does not constitute tax advice, does not take into account any Stockholder's specific facts and circumstances, and does not purport to be a complete summary of the tax consequences of the Reverse Stock Split to a Stockholder. Each Stockholder should consult such Stockholder's own tax advisor with respect to the tax consequences of the Reverse Stock Split.](#)

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 ▶ July 7, 2023

Print your name ▶ **Patrick Truesdell** Title ▶ **Principal Accounting Officer**

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶	Firm's EIN ▶			
	Firm's address ▶	Phone no.			