

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 316

IRC Section 301(c)

18 Can any resulting loss be recognized? ▶ **The organizational actions do not result in recognition of loss for U.S. Federal income tax purposes.**

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ **The reportable year is 2024. Class A and Class C common stock shareholders may need to reduce the basis of their Class A and Class C common stock held on the date by the pro rata share of the amount of the distribution.**

Sign Here 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.

Signature ▶  Date ▶ 1/14/2025

Print your name ▶ **Sarah Rubenstein** Title ▶ **Chief Financial 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.