

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name PECO-ARC INSTITUTIONAL REIT LLC		2 Issuer's employer identification number (EIN) 45-3274671	
3 Name of contact for additional information TOM DRAKE	4 Telephone No. of contact 513-338-2728	5 Email address of contact TDRAKE@PHILLIPSEDISON.COM	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 11501 NORTHLAKE DR.		7 City, town, or post office, state, and Zip code of contact CINCINNATI, OH 45249-1669	
8 Date of action JANUARY 2014		9 Classification and description COMMON STOCK	
10 CUSIP number N/A	11 Serial number(s) N/A	12 Ticker symbol N/A	13 Account number(s) N/A

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ IN JANUARY OF 2014, PECO-ARC INSTITUTIONAL REIT LLC PAID A DISTRIBUTION OF \$2,962,223. OF THIS AMOUNT, \$624,164 OR 30.27% OF THE TOTAL, IS A NONTAXABLE RETURN OF CAPITAL. AT THE TIME OF THE DISTRIBUTION THE TAXPAYER'S EARNINGS AND PROFITS WERE NOT CALCULATED AND THE PORTION OF THE DISTRIBUTION THAT WOULD BE TREATED AS A RETURN OF CAPITAL WAS UNCERTAIN. PURSUANT TO TREASURY REGULATION 1.6042-3(C), THE TAXPAYER PRESUMED 100% OF THE DISTRIBUTION TO BE A TAXABLE DIVIDEND, AND THEREFORE, WAS NOT REQUIRED TO FILE A FORM 8937. THE TAXPAYER ESTIMATED ITS EARNINGS AND PROFITS CALCULATION ON DECEMBER 31, 2014, AND AT THAT TIME IT WAS DETERMINED THAT 30.27% OF ITS JANUARY 2014 DISTRIBUTION WAS A RETURN OF CAPITAL. THE TAXPAYER IS FILING THIS FORM 8937 ON THE EARLIER OF JANUARY 15, 2014 OR 45 DAYS AFTER DECEMBER 31, 2014, THE DATE ON WHICH ITS EARNINGS AND PROFITS CALCULATION WAS ESTIMATED.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ SEE LINE 14 ABOVE

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ SEE LINE 14 ABOVE

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 301(C)(2)

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 ▶ N/A

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 ▶	<i>Jeffrey Edison</i>		Date ▶	1/15/2015
Paid Preparer Use Only	Print your name ▶	JEFFREY EDISON		Title ▶	CFO
	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	CHARLES S. BASICH	<i>Charles S. Basich</i>	1/15/15		P00183617
	Firm's name ▶ DELOITTE TAX LLP	Firm's EIN ▶ 86-1065772		Phone no. 614-221-1000	
Firm's address ▶ 180 E. BROAD STREET, COLUMBUS, OH 43215					

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Part I Reporting Issuer

1 Issuer's name PECO-ARC INSTITUTIONAL REIT LLC		2 Issuer's employer identification number (EIN) 45-3274671	
3 Name of contact for additional information TOM DRAKE	4 Telephone No. of contact 513-338-2728	5 Email address of contact TDRAKE@PHILLIPSEDISON.COM	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 11501 NORTHLAKE DR.		7 City, town, or post office, state, and Zip code of contact CINCINNATI, OH 45249-1669	
8 Date of action FEBRUARY 2014		9 Classification and description COMMON STOCK	
10 CUSIP number N/A	11 Serial number(s) N/A	12 Ticker symbol N/A	13 Account number(s) N/A

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ IN FEBRUARY OF 2014, PECO-ARC INSTITUTIONAL REIT LLC PAID A DISTRIBUTION OF \$50,000. OF THIS AMOUNT, \$15,133 OR 30.27% OF THE TOTAL, IS A NONTAXABLE RETURN OF CAPITAL. AT THE TIME OF THE DISTRIBUTION THE TAXPAYER'S EARNINGS AND PROFITS WERE NOT CALCULATED AND THE PORTION OF THE DISTRIBUTION THAT WOULD BE TREATED AS A RETURN OF CAPITAL WAS UNCERTAIN. PURSUANT TO TREASURY REGULATION 1.6042-3(C), THE TAXPAYER PRESUMED 100% OF THE DISTRIBUTION TO BE A TAXABLE DIVIDEND, AND THEREFORE, WAS NOT REQUIRED TO FILE A FORM 8937. THE TAXPAYER ESTIMATED ITS EARNINGS AND PROFITS CALCULATION ON DECEMBER 31, 2014, AND AT THAT TIME IT WAS DETERMINED THAT 30.27% OF ITS FEBRUARY 2014 DISTRIBUTION WAS A RETURN OF CAPITAL. THE TAXPAYER IS FILING THIS FORM 8937 ON THE EARLIER OF JANUARY 15, 2014 OR 45 DAYS AFTER DECEMBER 31, 2014, THE DATE ON WHICH ITS EARNINGS AND PROFITS CALCULATION WAS ESTIMATED.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ SEE LINE 14 ABOVE

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ SEE LINE 14 ABOVE

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 301(C) (2)

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 ▶ N/A

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 ▶	<i>Jeffrey Edison</i>		Date ▶	1/15/2015
Paid Preparer Use Only	Print your name ▶	JEFFREY EDISON		Title ▶	CEO
	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	CHARLES S. BASICH	<i>Charles S. Basich</i>	1/15/15		200183617
	Firm's name ▶ DELOITTE TAX LLP	Firm's EIN ▶ 86-1065772		Phone no. 614-221-1000	
Firm's address ▶ 180 E. BROAD STREET, COLUMBUS, OH 43215					

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name PECO-ARC INSTITUTIONAL REIT LLC		2 Issuer's employer identification number (EIN) 45-3274671	
3 Name of contact for additional information TOM DRAKE	4 Telephone No. of contact 513-339-2728	5 Email address of contact TDRAKE@PHILLIPSEDISON.COM	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 11501 NORTHLAKE DR.		7 City, town, or post office, state, and Zip code of contact CINCINNATI, OH 45249-1669	
8 Date of action MARCH 2014		9 Classification and description COMMON STOCK	
10 CUSIP number N/A	11 Serial number(s) N/A	12 Ticker symbol N/A	13 Account number(s) N/A

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ IN MARCH OF 2014, PECO-ARC INSTITUTIONAL REIT LLC PAID A DISTRIBUTION OF \$200,000. OF THIS AMOUNT, \$60,533 OR 30.27% OF THE TOTAL, IS A NONTAXABLE RETURN OF CAPITAL. AT THE TIME OF THE DISTRIBUTION THE TAXPAYER'S EARNINGS AND PROFITS WERE NOT CALCULATED AND THE PORTION OF THE DISTRIBUTION THAT WOULD BE TREATED AS A RETURN OF CAPITAL WAS UNCERTAIN. PURSUANT TO TREASURY REGULATION 1.6042-3(C), THE TAXPAYER PRESUMED 100% OF THE DISTRIBUTION TO BE A TAXABLE DIVIDEND, AND THEREFORE, WAS NOT REQUIRED TO FILE A FORM 8937. THE TAXPAYER ESTIMATED ITS EARNINGS AND PROFITS CALCULATION ON DECEMBER 31, 2014, AND AT THAT TIME IT WAS DETERMINED THAT 30.27% OF ITS MARCH 2014 DISTRIBUTION WAS A RETURN OF CAPITAL. THE TAXPAYER IS FILING THIS FORM 8937 ON THE EARLIER OF JANUARY 15, 2014 OR 45 DAYS AFTER DECEMBER 31, 2014, THE DATE ON WHICH ITS EARNINGS AND PROFITS CALCULATION WAS ESTIMATED.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ SEE LINE 14 ABOVE

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ SEE LINE 14 ABOVE

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based \blacktriangleright IRC SECTION 301(C) (?)

18 Can any resulting loss be recognized? \blacktriangleright N/A

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year \blacktriangleright N/A

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 \blacktriangleright *Jeffrey Edison* Date \blacktriangleright 1/15/2015
 Print your name \blacktriangleright JEFFREY EDISON Title \blacktriangleright CEO

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	<u>CHARLES S. BASICH</u>	<i>Charles S. Basich</i>	<u>1/15/15</u>	<input type="checkbox"/>	<u>PG0183617</u>
	Firm's name \blacktriangleright <u>DELOITTE TAX LLP</u>	Firm's EIN \blacktriangleright <u>86-1065772</u>		Phone no <u>614-221-1000</u>	
	Firm's address \blacktriangleright <u>180 E. BROAD STREET, COLUMBUS, OH 43215</u>				

**Report of Organizational Actions
 Affecting Basis of Securities**

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name PECO-ARC INSTITUTIONAL REIT LLC		2 Issuer's employer identification number (EIN) 45-3274671	
3 Name of contact for additional information TOM DRAKE	4 Telephone No. of contact 513-333-2728	5 Email address of contact TDRAKE@PHILLIPSEDISON.COM	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 11501 NORTHLAKE DR.		7 City, town, or post office, state, and Zip code of contact CINCINNATI, OH 45249-1669	
8 Date of action MAY 2014		9 Classification and description COMMON STOCK	
10 CUSIP number N/A	11 Serial number(s) N/A	12 Ticker symbol N/A	13 Account number(s) N/A

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ IN MAY OF 2014, PECO-ARC INSTITUTIONAL REIT LLC PAID A DISTRIBUTION OF \$5,681. OF THIS AMOUNT, \$1,719 OR 30.27% OF THE TOTAL, IS A NONTAXABLE RETURN OF CAPITAL. AT THE TIME OF THE DISTRIBUTION THE TAXPAYER'S EARNINGS AND PROFITS WERE NOT CALCULATED AND THE PORTION OF THE DISTRIBUTION THAT WOULD BE TREATED AS A RETURN OF CAPITAL WAS UNCERTAIN. PURSUANT TO TREASURY REGULATION 1.6042-3(C), THE TAXPAYER PRESUMED 100% OF THE DISTRIBUTION TO BE A TAXABLE DIVIDEND, AND THEREFORE, WAS NOT REQUIRED TO FILE A FORM 8937. THE TAXPAYER ESTIMATED ITS EARNINGS AND PROFITS CALCULATION ON DECEMBER 31, 2014, AND AT THAT TIME IT WAS DETERMINED THAT 30.27% OF ITS MAY 2014 DISTRIBUTION WAS A RETURN OF CAPITAL. THE TAXPAYER IS FILING THIS FORM 8937 ON THE EARLIER OF JANUARY 15, 2014 OR 45 DAYS AFTER DECEMBER 31, 2014, THE DATE ON WHICH ITS EARNINGS AND PROFITS CALCULATION WAS ESTIMATED.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ SEE LINE 14 ABOVE

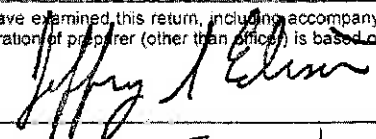

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ SEE LINE 14 ABOVE

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 301 (C) (2)

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 **▶** N/A

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 ▶
	Print your name ▶	<u>JEFFREY EDISON</u>		Title ▶
Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed PTIN
	<u>CHARLES S. BASICH</u>		<u>1/15/15</u>	<u>P00183617</u>
	Firm's name ▶ <u>DELOITTE TAX LLP</u>	Firm's address ▶ <u>180 E. BROAD STREET, COLUMBUS, OH 43215</u>		Firm's EIN ▶ <u>86-1065772</u> Phone no <u>614-221-1000</u>

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Part I Reporting Issuer

1 Issuer's name PECO-ARC INSTITUTIONAL REIT LLC		2 Issuer's employer identification number (EIN) 45-3274671	
3 Name of contact for additional information TOM DRAKE	4 Telephone No. of contact 513-338-2728	5 Email address of contact TDRAKE@PHILLIPSEDISON.COM	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 11501 NORTELAKELAKE DR.		7 City, town, or post office, state, and Zip code of contact CINCINNATI, OH 45249-1669	
8 Date of action JUNE 2014	9 Classification and description COMMON STOCK		
10 CUSIP number N/A	11 Serial number(s) N/A	12 Ticker symbol N/A	13 Account number(s) N/A

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action: **IN JUNE OF 2014, PECO-ARC INSTITUTIONAL REIT LLC PAID A DISTRIBUTION OF \$1,800,000. OF THIS AMOUNT, \$544,798 OR 30.27% OF THE TOTAL, IS A NONTAXABLE RETURN OF CAPITAL. AT THE TIME OF THE DISTRIBUTION THE TAXPAYER'S EARNINGS AND PROFITS WERE NOT CALCULATED AND THE PORTION OF THE DISTRIBUTION THAT WOULD BE TREATED AS A RETURN OF CAPITAL WAS UNCERTAIN. PURSUANT TO TREASURY REGULATION 1.6042-3(C), THE TAXPAYER PRESUMED 100% OF THE DISTRIBUTION TO BE A TAXABLE DIVIDEND, AND THEREFORE, WAS NOT REQUIRED TO FILE A FORM 9937. THE TAXPAYER ESTIMATED ITS EARNINGS AND PROFITS CALCULATION ON DECEMBER 31, 2014, AND AT THAT TIME IT WAS DETERMINED THAT 30.27% OF ITS JUNE 2014 DISTRIBUTION WAS A RETURN OF CAPITAL. THE TAXPAYER IS FILING THIS FORM 8937 ON THE EARLIER OF JANUARY 15, 2014 OR 45 DAYS AFTER DECEMBER 31, 2014, THE DATE ON WHICH ITS EARNINGS AND PROFITS CALCULATION WAS ESTIMATED.**

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis: **SEE LINE 14 ABOVE**

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates: **SEE LINE 14 ABOVE**

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 301(G) (?)

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 ▶ N/A

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 ▶ *Jeffrey Edison*
 Date ▶ 1/15/2015
 Print your name ▶ JEFFREY EDISON
 Title ▶ CEO

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	CHARLES S. BASICH	<i>Charles S. Basich</i>	1/15/15		P00183617
	Firm's name ▶ DELOITTE TAX LLP	Firm's EIN ▶ 86-1065772		Phone no. 614-221-1000	
	Firm's address ▶ 180 E. BROAD STREET, COLUMBUS, OH 43215				

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 301(C)(2)

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 ▶ N/A

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 ▶	<i>Jeffrey Edison</i>	Date ▶	1/15/2015
Paid Preparer Use Only	Print your name ▶	JEFFREY EDISON	Title ▶	CEO
	Print/Type preparer's name	CHARLES S. BASICH	Preparer's signature	<i>Charles S. Basich</i>
	Firm's name ▶	DELOITTE TAX LLP	Date	1/15/15
	Firm's address ▶	180 E. BROAD STREET, COLUMBUS, OH 43215	Check <input type="checkbox"/> if self-employed	PTIN PC0183617
			Firm's EIN ▶	86-1065772
			Phone no.	614-221-1000

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name PECO-ARC INSTITUTIONAL REIT LLC		2 Issuer's employer identification number (EIN) 45-3274671	
3 Name of contact for additional information TOM DRAKE	4 Telephone No. of contact 513-338-2728	5 Email address of contact TDRAKE@PHILLIPSEDYSON.COM	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 11501 NORTHLAKE DR.		7 City, town, or post office, state, and Zip code of contact CINCINNATI, OH 45249-1669	
8 Date of action AUGUST 2014		9 Classification and description COMMON STOCK	
10 CUSIP number N/A	11 Serial number(s) N/A	12 Ticker symbol N/A	13 Account number(s) N/A

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ IN AUGUST OF 2014, PECO-ARC INSTITUTIONAL REIT LLC PAID A DISTRIBUTION OF \$900,222. OF THIS AMOUNT, \$272,466 OR 30.27% OF THE TOTAL, IS A NONTAXABLE RETURN OF CAPITAL. AT THE TIME OF THE DISTRIBUTION THE TAXPAYER'S EARNINGS AND PROFITS WERE NOT CALCULATED AND THE PORTION OF THE DISTRIBUTION THAT WOULD BE TREATED AS A RETURN OF CAPITAL WAS UNCERTAIN. PURSUANT TO TREASURY REGULATION 1.6042-3(C), THE TAXPAYER PRESUMED 100% OF THE DISTRIBUTION TO BE A TAXABLE DIVIDEND, AND THEREFORE, WAS NOT REQUIRED TO FILE A FORM 8937. THE TAXPAYER ESTIMATED ITS EARNINGS AND PROFITS CALCULATION ON DECEMBER 31, 2014, AND AT THAT TIME IT WAS DETERMINED THAT 30.27% OF ITS AUGUST 2014 DISTRIBUTION WAS A RETURN OF CAPITAL. THE TAXPAYER IS FILING THIS FORM 8937 ON THE EARLIER OF JANUARY 15, 2014 OR 45 DAYS AFTER DECEMBER 31, 2014, THE DATE ON WHICH ITS EARNINGS AND PROFITS CALCULATION WAS ESTIMATED.

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16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ SEE LINE 14 ABOVE

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 301(C) (2)

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 ▶ N/A

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 ▶

Jeffrey Edison

Date ▶

1/15/2015

Print your name ▶

JEFFREY EDISON

Title ▶

CEO

Paid Preparer Use Only

Print/Type preparer's name

CHARLES S. BASICH

Preparer's signature

Charles S. Basich

Date

1/15/15

Check if self-employed

PTIN

PC0183617

Firm's name ▶ DELOITTE TAX LLP

Firm's EIN ▶ 86-1065772

Firm's address ▶ 180 E. BROAD STREET, COLUMBUS, OH 43215

Phone no. 614-221-1000

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 301(C) (2)

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 ▶ N/A

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Sign Here

Signature ▶

Jeffrey Edison

Date ▶

1/15/2015

Print your name ▶

JEFFREY EDISON

Title ▶

CEO

Paid Preparer Use Only

Print/Type preparer's name

CHARLES S. BASICH

Preparer's signature

Charles S. Basich

Date

1/15/15

Check if self-employed

PTIN

P00183617

Firm's name ▶ DELOITTE TAX LLP

Firm's EIN ▶ 86-1065772

Firm's address ▶ 180 E. BROAD STREET, COLUMBUS, OH 43215

Phone no. 614-221-1000

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 301(C) (2)

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 ▶ N/A

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	Signature ▶	<i>Jeffrey Edison</i>		Date ▶	<i>1/15/2015</i>
	Print your name ▶	JEFFREY EDISON		Title ▶	CEO
Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	CHARLES S. BASICH	<i>Charles S. Basich</i>	<i>1/15/15</i>		EG0183617
	Firm's name ▶ DELOITTE TAX LLP	Firm's address ▶ 180 E. BROAD STREET, COLUMBUS, OH 43215		Firm's EIN ▶ 86-1065772	Phone no. 614-221-1000

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 301(C)(2)

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 ▶ N/A

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 ▶ *Jeffrey Edison* Date ▶ 1/15/2015
 Print your name ▶ JEFFREY EDISON Title ▶ CEO

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	CHARLES S. BASICH	<i>Charles S. Basich</i>	1/15/15		P00183617
	Firm's name ▶ DELOITTE TAX LLP	Firm's EIN ▶ 86-1065772		Phone no. 614-221-1000	
	Firm's address ▶ 180 E. BROAD STREET, COLUMBUS, OH 43215				