

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ The tax treatment of a stock split falls under Internal Revenue Code section 305(a).

18 Can any resulting loss be recognized? ▶ No gain or loss should be recognized as a result of this organizational action per the IRC section listed above.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ This organizational action occurred during PEI's 2011 tax year.

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 ▶ 1/17/12

Print your name ▶ Bryon McGregor Title ▶ CFO

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
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