

BLANK SECTION 83(b) ELECTION FORM

For your convenience, we are providing the attached blank Section 83(b) election form for your consideration. We strongly recommend that you consult your tax, accounting and/or legal advisors and consider filing a Section 83(b) election with the United States Internal Revenue Service for each founder whose units are subject to vesting and possible forfeiture.

TO BE EFFECTIVE, A SECTION 83(B) ELECTION FORM MUST BE FILED WITH THE INTERNAL REVENUE SERVICE WITHIN THIRTY (30) DAYS AFTER THE PURCHASE OF THE UNITS IN THE COMPANY. LATE FILINGS WILL NOT BE EFFECTIVE. We strongly recommend that you (i) consult with your tax, accounting and/or legal advisors and consider filing a Section 83(b) election with the United States Internal Revenue Service.

**REMOVE THIS COVER PAGE BEFORE FILING THE
ELECTION FORM
WITH THE INTERNAL REVENUE SERVICE**

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This memorandum is not intended or written to be used, and it cannot be used, by any taxpayer for the purpose of avoiding United States federal income tax penalties that may be imposed on the taxpayer. Further, this memorandum is not intended or written to be used, and cannot be used, for the purpose of promoting, marketing or recommending to another party any transaction or matter addressed herein. Taxpayers should seek advice based on their own particular circumstances from an independent tax advisor. The foregoing notice is intended to satisfy the requirements for written tax advice under Section 10.35 of Internal Revenue Service Circular 230.

Election to Include in Gross Income
in Year of Transfer of Property
Pursuant to Section 83(b) of the Internal Revenue Code

The undersigned hereby makes an election pursuant to Section 83(b) of the Internal Revenue Code with respect to the property described below and supplies the following information in accordance with the regulations promulgated thereunder:

1. The name, address and taxpayer identification number of the undersigned are:

Name: _____

Address: _____

Taxpayer Identification Number: _____

2. Description of property to which the election is being made:

3. Date on which property was transferred: _____

The taxable year to which this election relates: _____

4. Nature of restrictions to which the property is subject:

5. Fair market value of the property at time of transfer: _____

6. Amount paid for the property: _____

7. A copy of this statement has been furnished to the Company issuing property.

Date: _____

Name: