► See separate instructions.

2 Issuer's employer identification number (EIN) N/A 5 5 Email address of contact dboucinha@ci.com 7 7 City, town, or post office, state, and ZIP code of contact Toronto, Ontario, M5J 0A3 bution 13 Account number(s) N/A ack of form for additional questions. ainst which shareholders' ownership is measured for
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ainst which shareholders' ownership is measured for
ers throughout the 2023 taxation year. Turn of capital that occurred throughout
the hands of a U.S. taxpayer as an adjustment per
, such as the market values of securities and the

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Pa	rt II	Organizational Action (continued)			
17		applicable Internal Revenue Code section(s) and subsection(s) upon which the tax to	reatment is based ▶	IRC section 301(c)(2),	
				312 and 316	
18	Can an	resulting loss be recognized? \blacktriangleright N/A			
	–			NI/A	
19	Provide	any other information necessary to implement the adjustment, such as the reportab	le tax year ►	N/A	
	Und	r penalties of perjury, I declare that I have examined this return, including accompanying sche	dules and statements	, and to the best of my knowledge and	
		it is true, correct, and complete. Declaration of preparer (other than officer) is based on all infor	mation of which prepa	arer has any knowledge.	
Sigr Her	<u> </u>			Date March 31, 2023	
пег	Sign		Date March 31,	2023	
	Drint	your name ► Darie Urbanky	Title President	and Chief Operating Officer	
Pai		Print/Type preparer's name Preparer's signature	Date	Check if PTIN	
	a parer			self-employed	
	e Only	Firm's name		Firm's EIN ►	
		Firm's address ►		Phone no.	

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054