(December 2011)

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-2224

Department of the Treasury Internal Revenue Service						
Part I Reportir	a Issuer					
1 Issuer's name				2 Issuer's employer ident	ification number (EIN)	
UltraShort Latin Americ			26-1147233			
3 Name of contact for	additional information	4 Telephor	ne No. of contact	5 Email address of contact		
Christopher E. Sabato		christopher.sabato@citi.co				
6 Number and street (or P.O. box if mail is not	7 City, town, or post office, star	7 City, town, or post office, state, and Zip code of contact			
4400 Easton Commons	Suite 200	Columbus, OH 43219				
8 Date of action						
January 22, 2018			1:5 stock split of commo			
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)		
74318X778			UFPSX			
Part II Organiza	ational Action Attac	h additiona	statements if needed.	See back of form for additional que	estions.	
				date against which shareholders' owne		
				suer completed a one to five (1:5) re-	verse split of	
its common stock. The	reverse split was affe	cted by a dis	tribution of 1 shares for e	each 5 share of stock outstanding.		
						
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				-		
				urity in the hands of a U.S. taxpayer as		
share or as a perce	entage of old basis ► Th	ne distributio	n of shares is non-taxabl	e to shareholders. Basis and holdin	period of old shares	
				ed. Basis in each new share = 500%	of the basis in each	
old share with respect t	o which the old shares	were distrib	outed.			
		·				
						
						
	 -					
						
16 Describe the calcul	ation of the change in b	asis and the	data that supports the calc	ulation, such as the market values of s	ecurities and the	
				ggregate basis of new shares = aggr		
				to which the old shares were distrib		
				The William District Street St	utou:	
		-				

Form 893	37 (Rev	. 12-2011)					Page 2
Part		Organizational Action (continued)					
			(s) and subsection(s) upon which the tax tre				
			hareholders with respect to its stock, in	cluding	a stock s	plit transaction, is no	t taxable
		older. IRC § 305(a)(1).	and the second constraint	100.00	07/-1		
			mong the shares of new stock received.		107(a).		
ine no	aing I	eriod of the new stock includes the noi	ding period of the old stock. IRC §1223(4).			
Altorna	tivoly	the transaction may be considered to h	ee a recapitalization transaction. IRC §30	SR(a)(1)	(F) In su	ch instance, the con-	sequences
		der are the same:	e a recapitalization dansaction. Into 350	JO(U)(1)	C). III SU	ciriistanoc, the con.	ocqueriocs
		on of the new stock is not taxable incor	me to the shareholder. IRC \$354(a)(1).				
			mong the shares of new stock received.	IRC §3	358 (a)(1); (b)(1).	
			ding period of the old stock. IRC §1223(1			
- CX 220 40 -							
			200				
18 C	an any	resulting loss be recognized? ► N/A					
	-						-
		1222					
				_			
-							
-			· · · · · · · · · · · · · · · · · · ·				
	9-523						
19 P	rovide	any other information necessary to implen	nent the adjustment, such as the reportable	e tax ye	ar ▶ N/A	<u></u>	
						<u>. </u>	
							
	Unde	r penalties of perjury, I declare that I have exam	lined this return, including accompanying schedu	ules and	statements,	and to the best of my kr	nowledge and
	belief	it is true, correct, and complete. Declaration of	preparer (other than officer) is based on all inform	nation of	which prepa	rer has any knowledge.	
Sign							
Here	Signa	ture >		Date 🟲			
	Print	your name ► Christopher E. Sabato		Title ►	Treasurer		
Paid		Print/Type preparer's name	Preparer's signature	Date		Check if PTIN	
Prepa	arer					self-employed	
Use C		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