## (December 2011) Department of the Treasury

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

▶ See separate instructions.

OMB No. 1545-2224

Internal Revenue Service Reporting Issuer Part I 2 Issuer's employer identification number (EIN) Issuer's name P10 INDUSTRIES, INC. 74-2961657 3 Name of contact for additional information Telephone No. of contact 5 Email address of contact JAY POWERS 919-601-2779 powers@p10industries.com 6 Number and street (or P.O. box if mail is not delivered to street address) of contact 7 City, town, or post office, state, and Zip code of contact 8214 WESTCHESTER DRIVE, SUITE 950 DALLAS, TX 75225 8 Date of action 9 Classification and description 5/4/2017 CANCELLATION AND ISSUANCE OF SHARES UNDER CHAPTER 11 10 CUSIP number 11 Serial number(s) 12 Ticker symbol 13 Account number(s) 69372U 207 Organizational Action Attach additional statements if needed. See back of form for additional questions. Part II Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ► ON MAY 4, 2017, PURSUANT TO THE PREPACKAGED PLAN OF REORGANIZATION UNDER CHAPTER 11 OF THE U.S. BANKRUPTCY CODE, ALL ISSUED AND OUTSTANDING COMMON STOCK IN THE COMPANY WERE DEEMED CANCELLED AND IMMEDIATELY THEREAFTER, SHARES OF NEW COMMON STOCK WERE DEEMED ISSUED, SUCH THAT EACH CANCELLED SHARE OF STOCK WAS REPLACED BY A SHARE OF NEW COMMON STOCK ON A 1-FOR-1 BASIS. 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 ► EACH SHARE OF ISSUED AND OUTSTANDING AT THE TIME OF THE ACTION WAS DEEMED TO BE CANCELLED AND REPLACED BY A NEW SHARE ON A SHARE FOR SHARE BASIS. 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 ► PURSUANT TO THE EXPLANATION IN #15 ABOVE, THERE IS NO CHANGE IN BASIS PER SHARE OF ISSUED AND OUTSTANDING STOCK AFTER THE ORGANIZATIONAL ACTION.

Part		Organizational Action (continued)		
		applicable Internal Revenue Code section(s) and subsection(s) u	pon which the tax treatment is based ▶	
368(a)(	1)(G)			
354 358				
330				
<b>18</b> Can any resulting loss be recognized? ► NO				
To Carrainy resulting 1033 be recognized: P				
19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► N/A				
	I			
		r penalties of perjury, I declare that I have examined this return, including , it is true, correct, and complete. Declaration of preparer (other than offic		
Sign				
Here	Signs	ature ▶	Date <b>▶</b>	
	Joigi i	ıture ▶	Date F	
	Print	your name ▶	Title ►	
Paid		Print/Type preparer's name Preparer's signature	O 26 Date	Check / if PTIN
Prepa	arer	MARK HAMRE		self-employed P00852688
Use (		Firm's name ► POPE, SHAMSIE & DOOLEY LLP		Firm's EIN ▶ 01-0635794
		Firm's address ► 4201 W. PARMER LANE, B-200, AUSTIN, TX		Phone no. 512-836-1186
Send Fo	orm 89	37 (including accompanying statements) to: Department of the 1	reasury, Internal Revenue Service, Ogde	en, UT 84201-0054