

**FORM 8621: QUALIFIED ELECTING FUND INFORMATION**

ONLY THE FIRST U.S. SHAREHOLDER OF THE PFIC IS ELIGIBLE TO MAKE AN ELECTION UNDER IRC SECTION 1295 TO TREAT THESE INVESTMENTS AS A QUALIFIED ELECTING FUND ("QEF"). IF YOU MAKE A QEF ELECTION, YOU SHOULD DISREGARD THE DIVIDEND INCOME REPORTED AS A DISTRIBUTION, BELOW, FOR YOUR TAXABLE INCOME AND YOU SHOULD INCLUDE THE AMOUNT REPORTED UNDER QEF ELECTION AS ORDINARY INCOME AND AS LONG-TERM CAPITAL GAIN IN YOUR TAX RETURN.

**PFIC #1**

NAME OF PFIC:  
ADDRESS (ENTER NUMBER, STREET, CITY OR TOWN AND COUNTRY):

UTA ACQUISITION CORPORATION  
PO BOX 309, UGLAND HOUSE  
GRAND CAYMAN, KY1-1104

EMPLOYER IDENTIFICATION NUMBER (IF ANY):  
REFERENCE ID NUMBER:  
TAX YEAR:

98-1616250  
N/A  
CALENDAR YEAR 2021

**PART I:**

- 1 DESCRIPTION OF SHARES HELD:
- 2 DATE SHARES ACQUIRED DURING THE TAX YEAR, IF APPLICABLE:
- 3 NUMBER OF SHARES HELD BY THE SHAREHOLDER AT THE END OF THE YEAR:
- 4 VALUE OF SHARES HELD BY THE SHAREHOLDER AT THE END OF THE TAX YEAR:
- 5 TYPE OF PFIC AND AMOUNT OF ANY EXCESS DISTRIBUTION OR GAIN TREATED AS AN EXCESS DISTRIBUTION UNDER SECTION 1291, INCLUSION UNDER 1293, OR INCLUSION OR DEDUCTION UNDER SECTION 1296:


NONE

**PART II:** AN ELECTION TO TREAT THE PFIC AS A QUALIFIED ELECTING FUND ("QEF")

	Decided at the US shareholder level
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**PART III:**

- 6A YOUR PRO RATA SHARE OF THE ORDINARY EARNINGS OF THE QEF:
- 7A YOUR PRO RATA SHARE OF TOTAL NET CAPITAL GAIN OF THE QEF - THREE YEARS OR LESS:  
YOUR PRO RATA SHARE OF TOTAL NET CAPITAL GAIN OF THE QEF - MORE THAN THREE YEARS:
- 8B YOUR PRO RATA SHARE OF THE QEF'S DISTRIBUTIONS OR DEEMED DISTRIBUTIONS:

NONE Only if QEF election made  
NONE  
NONE  
NONE