

CONSENT TO DISCLOSE TAX INFORMATION

I hereby consent, pursuant to section 6103(c) of the Internal Revenue Code of 1986 (as amended), to the disclosure of return information (as defined in section 6103(b)(2)) relating to the Closing Agreement ("Agreement") between _____ ("Company") and the Commissioner of Internal Revenue ("Commissioner"), executed by the parties on _____, as follows:

The Commissioner, or his or her authorized delegate, may disclose Company's: (a) legal name, (b) principal place of business, (c) country of residence for income tax treaty purposes, (d) effective date of the Agreement, (e) failure to timely recertify Company's entitlement to treaty benefits in accordance with the terms of its closing agreement (if applicable), and (f) termination date of the Agreement (if applicable). Such disclosures may be made to any person and by any means, including publication on www.irs.gov, press releases and notices in Internal Revenue Service publications, without prior notice to Company.

I am aware that in the absence of this authorization, the returns and return information of Company are confidential and may not be disclosed except as authorized by the Internal Revenue Code and the Agreement.

I certify that I have the authority to execute this consent on behalf of Company.

Date: _____

Company legal name: _____

EIN: _____

Address (principal place of business): _____

Country of residence for treaty purposes: _____

By: _____
[Printed Name of Individual Executing Consent]

Title: _____
[Title of Individual Executing Consent]

Signature: _____