

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name JUUL Labs, Inc.		2 Issuer's employer identification number (EIN) 87-0798194	
3 Name of contact for additional information Nick Lee	4 Telephone No. of contact (650) 201-6553	5 Email address of contact nlee@juul.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 560 20th Street		7 City, town, or post office, state, and ZIP code of contact San Francisco, CA 94107	
8 Date of action 12/20/2018		9 Classification and description Class A and B Common Stock, Series C, D and E Preferred Stock	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 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 December 20, 2018, the Issuer made cash distributions to its common and preferred stock shareholders.

15 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 ▶ As the Company is not expecting to have current year or accumulated earnings and profits with respect to its taxable year ending December 31, 2018, the above distributions are expected to be a non-dividend distributions and treated as a return of capital under Internal Revenue Code Section 301(c)(2) to the extent of the receiving shareholder's basis in the shares of the Company's common and/or preferred stock owned by that shareholder. To the extent that any distribution exceeds shareholder basis, such excess will be treated as gain from the sale or exchange of stock to that shareholder under Internal Revenue Code Section 301(c)(3). The tax basis of each share of stock owned by the shareholder should be ratably reduced, but not below zero, by the non-taxable portion of the distribution.

16 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 ▶ The cash distributions made to shareholders on December 20, 2018 reduce the receiving shareholder's basis, but not below zero, in the Issuer's securities. Amounts in excess of the shareholder's basis should be treated as gain from the sale or exchange of stock.


Part II **Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Internal Revenue Code Sections 316 and 301.

18 Can any resulting loss be recognized? ▶ N/A

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year is the tax year ending December 31, 2018.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here
Signature ▶  Date ▶ 02-Jan-2019
Print your name ▶ Tim Danaher Title ▶ CFO

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶	Firm's EIN ▶			
	Firm's address ▶	Phone no.			