

Certificate of Non-Foreign Status

November 6, 2017

Section 1445 of the Internal Revenue Code provides that a transferee (buyer) of a U.S. real property interest must withhold tax if the transferor (seller) is a foreign person. To inform buyer that a withholding of tax is not required upon the disposition of a U.S. real property interest by Blue Sky Utility LLC, a California limited liability company ("Seller"), the undersigned hereby certifies the following on behalf of Seller:

1. Seller is not a foreign person, foreign corporation, foreign partnership, foreign trust, or foreign estate (as those terms are defined in the Internal Revenue Code and Income Tax Regulations).
2. Seller is not a disregarded entity as defined in Treasury Regulations Section 1.1445-2(b)(2)(iii).
3. Seller's U.S. tax identification number is 27-0239326.
4. Seller's address is:

Attention: Ran Bujanover
1715 2nd St, Suite 200
Napa, CA 94559

Seller understands that this certification may be disclosed to the Internal Revenue Service by buyer and that any false statement contained herein could be punished by fine, imprisonment, or both.

[Signature page follows]

Under penalties of perjury I declare that I have examined this certification and to the best of my knowledge and belief it is true, correct and complete, and I further have authority to sign this document on behalf of Seller.

BLUE SKY UTILITY LLC

A handwritten signature in black ink, appearing to read "Ran Bujanover", is written over a horizontal line. A vertical line is positioned to the right of the signature.

By: ,

Name: Ran Bujanover
Title: President