

## Asset Allocation Statement Under Section 338

▶ Attach to your income tax return. ▶ See separate instructions.

### Part I Filer's Identifying Information

|   |  |
|---|--|
| <b>1a</b> Name as shown on return   | <b>1b</b> Identifying number as shown on return  |
| <b>1c</b> Check applicable box (see instructions):<br><input type="checkbox"/> Old target <input type="checkbox"/> New target | <b>1d</b> Was a valid and timely Form 8023 filed? . . . <input type="checkbox"/> Yes <input type="checkbox"/> No<br>If yes, enter the date filed ▶ |

### Part II Other Party's Identifying Information

|  |  |
|--|--|
| <b>2a</b> Name of other party to the transaction | <b>2b</b> Other party's identifying number |
| Address (number, street, and room or suite no.)  |  |
| City or town, state, and ZIP code                |  |

### Part III Target Corporation's Identifying Information

|  |   |
|--|---|
| <b>3a</b> Name and address of target corporation | <b>3b</b> Employer identification number    |
|  | <b>3c</b> State or country of incorporation |

### Part IV General Information

|                            |  |                              |                     |
|----------------------------|--|------------------------------|---------------------|
| <b>4a</b> Acquisition date | <b>4b</b> What percentage of target corporation stock was purchased:<br>(i) During the 12-month acquisition period? _____ %<br>(ii) On the acquisition date? . . . . . % |                              |                     |
| <b>5a</b> Stock price      | <b>5b</b> Acquisition costs/Selling costs  | <b>5c</b> Target liabilities | <b>5d</b> AGUB/ADSP |
| \$                         | \$   | \$                           | \$                  |

|  |  | Yes | No |
|--|--|-----|----|
| <b>6</b> Was the filer listed in Part I, above, a member of an affiliated group of corporations before the acquisition date?   |  |     |    |
| <b>7</b> Was the target corporation a member of an affiliated group before the acquisition date? . . . . .   |  |     |    |
| <b>8</b> Is the target corporation or any target affiliate:  |  |     |    |
| <b>a</b> A controlled foreign corporation? If "No," check here if it was a CFC at any time during the preceding 5 years ▶ <input type="checkbox"/>   |  |     |    |
| <b>b</b> A foreign corporation with income, gain, or loss effectively connected with the conduct of a trade or business within the United States (including U.S. real property interests)? . . . . . |  |     |    |
| <b>c</b> A qualifying foreign target under Regulations section 1.338-2(e)(1)(iii)? . . . . .   |  |     |    |
| <b>d</b> A corporation electing under section 1504(d) or section 953(d)? . . . . .   |  |     |    |
| <b>e</b> A domestic international sales corporation (DISC)? . . . . .  |  |     |    |
| <b>f</b> A passive foreign investment company (PFIC)? . . . . .  |  |     |    |
| <b>g</b> If the answer to item 8f is "Yes," is the PFIC a pedigreed qualified electing fund? . . . . .   |  |     |    |

**Part V Original Statement of Assets Transferred**

| <b>9</b> Assets  | Aggregate fair market value (actual amount for Class I) | Allocation of AGUB or ADSP |
|------------------|---|----------------------------|
| Class I          | \$  | \$                         |
| Class II         | \$  | \$                         |
| Class III        | \$  | \$                         |
| Class IV         | \$  | \$                         |
| Class V          | \$  | \$                         |
| Class VI and VII | \$  | \$                         |
| Total            | \$  | \$                         |

**Part VI Supplemental Statement of Assets Transferred**—Complete if amending an original statement or previously filed supplemental statement because of an increase or decrease in AGUB or ADSP.

**10** Enter the tax year and tax return form number with which the original Form 8023 or Form 8883 and any supplemental statements were filed.

| <b>11</b> Assets | Allocation of sales price as previously reported | Increase or (decrease) | Redetermined allocation of AGUB or ADSP |
|------------------|--|------------------------|---|
| Class I          | \$   | \$                     | \$                                      |
| Class II         | \$   | \$                     | \$                                      |
| Class III        | \$   | \$                     | \$                                      |
| Class IV         | \$   | \$                     | \$                                      |
| Class V          | \$   | \$                     | \$                                      |
| Class VI and VII | \$   | \$                     | \$                                      |
| Total            | \$   |                        | \$                                      |

**12** Reason(s) for increase or decrease. Attach additional sheets if more space is needed.

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