

Asset Allocation Statement Under Section 338

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

Part I Filer's Identifying Information

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

Part II Other Party's Identifying Information

2a Name of other party to the transaction	2b 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

3a Name and address of target corporation	3b Employer identification number
	3c State or country of incorporation

Part IV General Information

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

	Yes	No
6 Was the filer listed in Part I, above, a member of an affiliated group of corporations before the acquisition date?		
7 Was the target corporation a member of an affiliated group before the acquisition date?		
8 Is the target corporation or any target affiliate:	/ /	/ /
a 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 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)?		
c A qualifying foreign target under Regulations section 1.338-2(e)(1)(iii)?		
d A corporation to which section 936 applies?		
e A corporation electing under section 1504(d) or section 953(d)?		
f A domestic international sales corporation (DISC)?		
g A passive foreign investment company (PFIC)?		
h If the answer to item 8g is "Yes", is the PFIC a pedigreed qualified electing fund?		

Part V Original Statement of Assets Transferred

9 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.

11 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.

