

15 Describa the quantiative effect of the organtzational action on the besis of the security in tha hands of a U.S. taxpayer as an adjustmant per share or as a parcentage of cld basls > The stock split is a nontaxabletransaction under IRS SEC. 305(a) and the shareholder's basis is allocated in accordance with IRC SEC. 307(e). When the shareholdar received additional stock C through the stock splif, the basis of the now stock and the original stock was determined by allocating the basis between the new stock and the original stock. The total basis in the original stock Is the same as the total basis of the new and the original stock. However, the basis per share in the original and the naw stock Is $2 / 3$ of tha basis of the original stock (before the stock split).

18 Descrite the colculation of the change in basis and the data that supports the calculation, sych as the market values of securities and the valuation dates $>$ On June 15, 2018 , the adiusted closing price was $\$ 31.53$ per share; on June 18, 2018, the adjusted closing price was $\$ 21.20$ per share, which is reflective of the threa-for-two stock split.

As described in 15 above, to determina tha basis par share in the original and the new stock, the basis is $2 / 3$ of the basis of the original stock (before the stock split). Sea example betow.

Shareholdar owns 1 share with a basis of $\$ 100$. Due to the stock spll, the shareholder now owns 1.5 shares of stock, yalued at $\$ 100$. The basis par share Is \$66,67 (2/3 of \$100).

## Part II Organizational Action (continued)

17 List the applicable Intemal Revenue Code section(s) and subsection(s) upon which the tax treatment is based $>$ IRC SEC 305(a) and 307(a)
$\qquad$
18 Can any resulting loss be recognized? No loss can be recognized in connection with the threa-for-two stock split.
—

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year $>$ The reportable tax year is 2018 for stockholders reporting taxable income on a calendar year basis. For stockholders reporting taxable income on a basis other than calendar year, the reportable year is the stockholder's tax year that includes June 15, 2018.
$\qquad$


