

# Asset Allocation Statement Under Section 338

▶ **Attach to your income tax return.**  
 ▶ **Go to [www.irs.gov/Form8883](http://www.irs.gov/Form8883) for instructions and the latest information.**

## 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): <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 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: (i) During the 12-month acquisition period? _____ % (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**

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.

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