

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis Under Internal Revenue Code (IRC) Section 305(a), the stock split was a non-taxable transaction. Under IRC Section 307(a), each shareholder is required to allocate the aggregate tax basis in his or her shares held immediately prior to the $\mathbf{2}$ for 1 split among the shares held immediately after the split. As a result, the number of shares held by each shareholder were multiplied by 2 and the basis in each share following the stock split was $1 / 2$ of the basis immediately prior to the stock split.
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16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates See Section 15 above.

## Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based Internal Revenue Code Sections 305(a) and 307(a)
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18 Can any resulting loss be recognized? No
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19 Provide any other information necessary to implement the adjustment, such as the reportable tax year
This organizational action is reportable with respect to calendar year 2021.
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[^0]:    Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054

