



Tax Reduction Letter

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Internal Revenue Code Section 362(a)

Basis to corporations.

(a) Property acquired by issuance of stock or as paid-in surplus. If property was acquired on or after June 22, 1954, by a corporation--

(1) in connection with a transaction to which section 351 (relating to transfer of property to corporation controlled by transferor) applies, or

(2) as paid-in surplus or as a contribution to capital,

then the basis shall be the same as it would be in the hands of the transferor, increased in the amount of gain recognized to the transferor on such transfer.

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