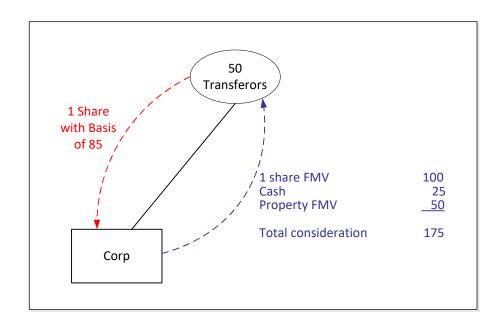
Treas.Reg.§1.356-1(d), Example 1

Stock Exchanged for Stock Plus Boot - Gain

LINCOLN



In an exchange to which the provisions of section 356 apply and to which section 354 would apply but for the receipt of property not permitted to be received without the recognition of gain or loss, A (either an individual or a corporation), received the following in exchange for a share of stock having an adjusted basis to A of \$85:

One share of stock worth	\$100
Cash	25
Other property (basis \$25) fair market value	50
Total fair market value of consideration received	175
Adjusted basis of stock surrendered in exchange	85
Total gain	90
Gain to be recognized, limited to cash and other property received	75
A's pro rata share of earnings and profits accumulated after February 28, 1913 (taxable divi	dend) 30
Remainder to be treated as a gain from the exchange of property	45