

Part II **Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ _____

[IRC SECTION 301\(c\)](#)

[IRC SECTION 316](#)

18 Can any resulting loss be recognized? ▶ [THE DISTRIBUTION WILL NOT RESULT IN A LOSS.](#)

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [WELLTOWER INC., A REAL ESTATE INVESTMENT TRUST, DECLARED AND PAID QUARTERLY CASH DISTRIBUTIONS TO ITS COMMON SHAREHOLDERS DURING ITS FISCAL YEAR COMMENCING JANUARY 1, 2017 AND ENDING DECEMBER 31, 2017.](#)

Sign Here Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature ▶ / s / Michael A. Garst Date ▶ 1/17/18

Print your name ▶ MICHAEL A. GARST Title ▶ VP - TAX

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.