

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
KBS Legacy Partners Apartment REIT, Inc.		27-0668930	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Stacie Yamane	949-417-6560	syamane@kbsrealty.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and Zip code of contact	
620 Newport Center Drive, Ste 1300		Newport Beach, CA 92660	
8 Date of action		9 Classification and description	
various see 14. below		Common Stock	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
48243K101			

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ Distributions in excess of earnings and profits were made on the following dates:
February 15, 2011; March 15, 2011; April 15, 2011; May 13, 2011; June 15, 2011; July 15, 2011; August 15, 2011; September 15, 2011;
October 14, 2011; November 15, 2011 and December 15, 2011.

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 ▶ February 15, 2011: Distribution per share \$0.055205; Return of Capital per share \$0.055205
March 15, 2011: Distribution per share \$0.049863; Return of Capital per share \$0.049863
April 15, 2011: Distribution per share \$0.055205; Return of Capital per share \$0.055205
May 13, 2011: Distribution per share \$0.053425; Return of Capital per share \$0.053425
June 15, 2011: Distribution per share \$0.055205; Return of Capital per share \$0.055205
July 15, 2011: Distribution per share \$0.053425; Return of Capital per share \$0.053425
August 15, 2011: Distribution per share \$0.055205; Return of Capital per share \$0.055205
September 15, 2011: Distribution per share \$0.055205; Return of Capital per share \$0.055205
October 14, 2011: Distribution per share \$0.053425; Return of Capital per share \$0.053425
November 15, 2011: Distribution per share \$0.055205; Return of Capital per share \$0.055205
December 15, 2011: Distribution per share \$0.053425; Return of Capital per share \$0.053425

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 ▶ Distributions in excess of earnings and profits are applied against and reduce the adjusted basis of stock.

Part II Organizational Action (continued)

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

Section 301

18 Can any resulting loss be recognized? ▶ Not applicable

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ _____

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.

Sign Here Signature ▶  Date ▶ 11/17/2012

Print your name ▶ Stacie K Yamane Title ▶ Chief Accounting Officer

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.			