

**Report of Organizational Actions
 Affecting Basis of Securities**

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name KBS Legacy Partners Apartment REIT, Inc.		2 Issuer's employer identification number (EIN) 27-0668930	
3 Name of contact for additional information Stacie Yamane	4 Telephone No. of contact 949-417-6500	5 Email address of contact syamane@kbs.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 800 Newport Center Drive, Ste 700		7 City, town, or post office, state, and ZIP code of contact Newport Beach, CA 92660	
8 Date of action various see 14. below		9 Classification and description Common Stock	
10 CUSIP number 48243K101	11 Serial number(s)	12 Ticker symbol	13 Account number(s)

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 ▶

The plan of liquidation was approved by shareholders on December 19, 2017. The plan of liquidation calls for the REIT to make a series of liquidating distributions which will result in the complete liquidating of each shareholder's investment. On April 30, 2018, the REIT paid a liquidating cash distribution in the amount of \$4.16 per share to shareholders of record as of April 27, 2018. On December 20, 2018, the REIT paid a liquidating cash distribution in the amount of \$0.26492767 per share to shareholders of record as of December 17, 2018. Both of these liquidating distributions were paid pursuant to the plan of liquidation.

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 ▶

**April 30, 2018: Liquidating distribution per share \$4.16
 December 20, 2018: Final liquidating distribution per share \$0.26492767**

The liquidating distributions were made pursuant to the plan of liquidation and will reduce the basis of the share. Shareholders should consult with their respective tax advisors for assisting in adjusting the basis of their respective shares as well as determining the amount and characterization of the income.

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 ▶

In accordance to IRC Code section 331, the basis of each share would be reduced, but not below zero, by the amount of any liquidating distributions.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶
Liquidating distribution: Section 331 and 346(a)

Blank lines for listing applicable Internal Revenue Code sections and subsections.

18 Can any resulting loss be recognized? ▶
Loss cannot be determined/recognized until final liquidating distribution is received by the shareholder.

Blank lines for providing information regarding the recognition of a resulting loss.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶
Information concerning the cash liquidating distribution is reported on Form 1099-DIV, Box 9.

Blank lines for providing other information necessary to implement the adjustment.

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 ▶ 1/18/19

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 ▶		Phone no.	
Firm's address ▶				