



**Part II Organizational Action** (continued)

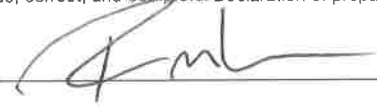
17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶  
1-4) IRC §301(c)(2), 312, 857

18 Can any resulting loss be recognized? ▶  
1-4) There can be no resulting loss recognized as a result of the return of capital.

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 ▶ 3/13/14

Print your name ▶ Robert Jambois Title ▶ SVP-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.	

**Brixmor Property Group Inc.**  
**E.I.N. 45-2433192**  
**For The Year Ended 12/31/2013**

**Statement Attached to and Made Part of Form 9937.**  
**Report of Organizational Actions Affecting Basis of Securities**

**Part II - Line 15**

- 1) Declared cash distributions in excess of its current earnings and profits:  
Distribution Date: February 14, 2013  
Total Distribution per share: \$125.00  
Taxable Income per Share: \$29.36  
Return of Capital per Share: \$95.64
  
- 2) Declared cash distributions in excess of its current earnings and profits:  
Distribution Date: May 16, 2013  
Total Distribution per share: \$125.00  
Taxable Income per Share: \$29.36  
Return of Capital per Share: \$95.64
  
- 3) Declared cash distributions in excess of its current earnings and profits:  
Distribution Date: October 22, 2013  
Total Distribution per share: \$250.00  
Taxable Income per Share: \$58.73  
Return of Capital per Share: \$191.28
  
- 4) Declared property distributions in excess of its current earnings and profits:  
Distribution Date: October 29, 2013  
Total Distribution per share: \$2429.01  
Taxable Income per Share: \$570.60  
Return of Capital per Share: \$1,858.42