**Section 2510.80 Annual Privilege Tax Allocation in Merger, Consolidation, Reorganization, or Reincorporation**

When a company survives or was formed by a merger, consolidation, reorganization or reincorporation, the premiums written or received, and amounts returned or paid by all companies party to such merger, consolidation, reorganization or reincorporation shall, for purposes of determining the amount of the annual privilege tax imposed by Section 409(3) of the Code, be regarded as written or received, returned or paid by such surviving or new company [215 ILCS 5/409(3)]. No tax deduction, credit, or offset shall be transferred as a result of a merger, consolidation, reorganization or reincorporation if the company who holds the tax deduction, credit, or offset still exists after the merger, consolidation, reorganization or reincorporation. Additionally, no tax deduction, credit, or offset shall be considered transferred or owned by another taxpayer simply as the result of an assumption reinsurance agreement or as a result of a restructuring of a company or companies.