

Adelphia Recovery Trust  
919 North Market Street  
Seventeenth Floor  
P.O. Box 8705  
Wilmington, DE 19899  
April 1, 2019

### **INFORMATION FOR U.S. FEDERAL INCOME TAX PURPOSES**

This letter provides information relating to your share of income, gain, deductions and loss ("Tax Items") of the Adelphia Recovery Trust (the "Trust") to be reported on your 2018 U.S. Federal and State income tax returns.

The Trust reports as a grantor trust for tax purposes and interest holders are considered grantors. This means that you are treated as recognizing an allocable portion of each Tax Item of the Trust as if you recognized such income, gain, deduction or loss directly.

The Trust has items of income and expense, including interest income, trustee expenses, accounting and banking fees and professional fees that are being reported and that have been allocated by class of interest. The attached Tax Worksheet for Holders of CVV Interests by CUSIP shows the allocation of these Tax Items by class of interest and by month using the cash method of accounting. You may determine your share of the Tax Items by referring to the Tax Worksheet for the class of interest you hold. In general, if you acquired your interests before January 1, 2018, and did not dispose of any of them during 2018, you should calculate your share of the Trust Tax Items for the entire year. If you acquired your interests after January 1, 2018, or if you disposed of any of them during 2018, you should calculate your share of Trust Tax Items for the portion of the year you held your interests. You should seek the advice of your advisor as the tax consequences to each holder depends on the particular circumstances of each holder including the date each holder acquired its interests in the Trust and the tax jurisdictions that apply to each holder. Information about the Trust Tax Items by class of interest held can be found on our website at:

<http://www.adelphiarestructuring.com/RecoveryTrust.aspx>

Pursuant to the Plan and the Trust Declaration, the ART was dissolved on December 31, 2016 (the "Dissolution Date"). After the Dissolution Date, for purpose of liquidating and winding up the affairs of the ART, the Trustees will continue, pursuant to the Trust, to act until the Trustees' duties under the Trust have been fully performed. During liquidation the Trust will continue to report as a grantor trust for tax purposes and interest holders will continue to be considered grantors until termination of the Trust. The remaining assets of the Trust comprise an interest-bearing note receivable with a tax basis of \$5.6 million and \$1.0 million in cash as of December 31, 2018.

THIS LETTER IS NOT INTENDED TO, AND DOES NOT, PROVIDE TAX ADVICE RELATING TO THE HOLDING OF INTERESTS. THIS LETTER DOES NOT ADDRESS ISSUES THAT MAY BE RELEVANT TO PARTICULAR CLASSES OF HOLDERS OF CVV INTERESTS (INCLUDING BUT NOT LIMITED TO SUBSEQUENT INTEREST HOLDERS). EACH HOLDER SHOULD SEEK TAX ADVICE BASED ON ITS PARTICULAR CIRCUMSTANCES FROM ITS OWN TAX ADVISOR. HOLDERS OF CVV INTERESTS ARE HEREBY NOTIFIED THAT ANY DISCUSSION OF TAX ISSUES CONTAINED OR REFERRED TO IN THIS LETTER IS NOT INTENDED OR WRITTEN TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF AVOIDING PENALTIES THAT MAY BE IMPOSED UNDER THE INTERNAL REVENUE CODE. THIS INFORMATION MAY NOT BE USED OR QUOTED IN WHOLE OR IN PART IN CONNECTION WITH ANY OFFERING OR SALE OF SECURITIES.