► See separate instructions.

Part Reportin	g issuer			
1 Issuer's name	-	2 Issuer's employer identification number (EIN)		
SPIRIT OF AMERICA EN	JERGY FUND	46-5618454		
3 Name of contact for		4 Telephone	e No. of contact	5 Email address of contact
DAVID LERNER ASSOC		t delivered to a	800-367-3000 treet address) of contact	7 City town or post office state and Zip code of context
	or P.O. DOX II mail is no	7 City, town, or post office, state, and Zip code of contact		
2960 N MERIDIAN ST, S	TE 300			INDIANAPOLIS, IN 46208
8 Date of action		9 Classification and description		
NOVEMBER 30, 2015			N STOCK	
10 CUSIP number	11 Serial number	(S)	12 Ticker symbol	13 Account number(s)
848579207			SOAEX	
	tional Action Atta	ch additional		ee back of form for additional questions.
				te against which shareholders' ownership is measured for
the action ► SEE	ATTACHED STATEM	ENT.		
				it is the bands of a U.O. to make a second instances to an
				ity in the hands of a U.S. taxpayer as an adjustment per
				CAPITAL IN THE ATTACHED STATEMEMENT
REPRESENTS A REDUC	TION OF THE SHARE	HULDERS I	AX BASIS ON SHARES HE	LD.
	_		lata that supports the calcul	ation, such as the market values of securities and the
valuation dates _	SEE LINE 15 ABOVE			

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► PURSUANT TO IRC SECTION 301(C)(1), THE PORTION OF A DISTRIBUTION WHICH IS A DIVIDEND (AS DEFINED UNDER IRC SECTION 316) IS INCLUDABLE IN GROSS INCOME. PURSUANT TO IRC SECTION 301(C)(2), THE PORTION OF THE DISTRIBUTION WHICH IS NOT A DIVIDEND SHALL BE APPLIED AGAINST AND REDUCE THE ADJUSTED BASIS OF THE STOCK.

 18 Can any resulting loss be recognized? ►
 NOT APPLICABLE TO THIS TRANSACTION AS NO LOSS WOULD BE RECOGNIZED

 ON THE RETURN OF CAPITAL DISTRIBUTION. THE SHAREHOLDER'S COST BASIS SHOULD BE ADJUSTED TO REFLECT

 THE RETURN OF CAPITAL DISTRIBUTION WHICH MAY AFFECT THE GAIN OR LOSS REALIZED UPON THE DISPOSITION OF THE

 SHARES.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► PURSUANT TO IRC SECTION 6045, AS AMENDED BY THE EMERGENCY ECONOMIC STABILIZATION ACT OF 2008, BROKERS ARE REQUIRED TO REFLECT THESE ADJUSTMENT IN THE COST BASIS REPORTING FOR COVERED SECURITIES. IF A BROKER IS NOT REQUIRED TO PROVIDE COST BASIS TO A PARTICULAR SHAREHOLDER, THE COST BASIS OF THE SHAREHOLDER'S SHARES SHOULD BE ADJUSTED AS OF THE DIVIDEND DATE TO REFLECT THE RETURN OF CAPITAL DESCRIBED ABOVE.

	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	Signa	A SIGNED COPY OF THIS FORM IS MAINTAINED AT THE OFFICES OF THE TAXPAYER							
	Print y	your name			Title ►				
Paid Prepa	rer	Print/Type preparer's name		Preparer's signature	Date	Check if end of the self-employed PTIN			
Use C						Firm's EIN ►			
	Firm's address ►				Phone no.				
Send Fo	rm 89	37 (inclue	ding accompanying statem	ents) to: Department of the Treasury,	Internal Revenue Service, Og	den, UT 84201-0054			

PART II, QUESTION 14

THE CORPORATION DECLARED THE FOLLOWING DISTRIBUTIONS TO SHAREHOLDERS IN THE YEAR ENDED NOVEMBER 30, 2015. 0.0% OF EACH DISTRIBUTION WAS CONSIDERED A TAXABLE DISTRIBUTION FROM THE CORPORATION'S EARNINGS AND PROFITS AND THE REMAINING 100.0% OF THE DISTRIBUTION IS FROM SOURCES OTHER THAN THE CORPORATION'S EARNINGS AND PROFITS, AND THE REMAINING 100.0% OF THE DISTRIBUTION IS FROM SOURCES OTHER THAN THE CORPORATION'S EARNINGS AND PROFITS, AND THE REMAINING 100.0% OF THE DISTRIBUTION IS FROM SOURCES OTHER THAN THE CORPORATION'S EARNINGS AND PROFITS, AND THE REMAINING 100.0% OF THE DISTRIBUTION IS FROM SOURCES OTHER THAN THE CORPORATION'S EARNINGS AND PROFITS, AND IS THEREFORE A RETURN OF CAPITAL TO THE SHAREHOLDER.

DETAIL OF EACH DISTRIBUTION MADE IN 2015 IS DESCRIBED BELOW:

EX-DATE	RECORD DATE	PAYABLE DATE	AMOUNT	% TAXABLE DIVIDEND	TAXABLE DIVIDEND AMOUNT	% RETURN OF CAPITAL	RETURN OF CAPITAL AMOUNT
1/6/2015	1/5/2015	1/6/2015	0.062500	0.00000%	\$ -	100.00000%	\$ 0.062500
1/30/2015	1/29/2015	1/30/2015	0.062500	0.00000%	\$ -	100.00000%	\$ 0.062500
2/27/2015	2/26/2015	2/27/2015	0.062500	0.00000%	\$-	100.00000%	\$ 0.062500
3/31/2015	3/30/2015	3/31/2015	0.062500	0.00000%	\$-	100.00000%	\$ 0.062500
4/30/2015	4/29/2015	4/30/2015	0.062500	0.00000%	\$-	100.00000%	\$ 0.062500
5/29/2015	5/28/2015	5/29/2015	0.062500	0.00000%	\$-	100.00000%	\$ 0.062500
6/30/2015	6/29/2015	6/30/2015	0.062500	0.00000%	\$ -	100.00000%	\$ 0.062500
7/31/2015	7/30/2015	7/31/2015	0.062500	0.00000%	\$ -	100.00000%	\$ 0.062500
8/31/2015	8/28/2015	8/31/2015	0.062500	0.00000%	\$ -	100.00000%	\$ 0.062500
9/30/2015	9/29/2015	9/30/2015	0.062500	0.00000%	\$ -	100.00000%	\$ 0.062500
10/30/2015	10/29/2015	10/30/2015	0.062500	0.00000%	\$ -	100.00000%	\$ 0.062500
11/30/2015	11/27/2015	11/30/2015	0.062500	0.00000%	\$ -	100.00000%	\$ 0.062500