(December 2011) Department of the Treasury

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

OMB No. 1545-2224

Internal Revenue Service Reporting Issuer Part I 2 Issuer's employer identification number (EIN) 1 Issuer's name SPIRIT OF AMERICA INCOME & OPPORTUNITY FUND 46-2996407 3 Name of contact for additional information 4 Telephone No. of contact 5 Email address of contact ALAN P. CHODOSH APCHODOSH@DAVIDLERNER.COM 6 Number and street (or P.O. box if mail is not delivered to street address) of contact 7 City, town, or post office, state, and Zip code of contact **477 JERICHO TURNPIKE** SYOSSET, NY 11791 8 Date of action 9 Classification and description SEE ATTACHED REGULATED INVESTMENT COMPANY (RIC) SHARES 10 CUSIP number 11 Serial number(s) 12 Ticker symbol 13 Account number(s) SEE ATTACHED SEE ATTACHED N/A Organizational Action Attach additional statements if needed. See back of form for additional questions. 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 SPIRIT OF AMERICA INCOME & OPPORTUNITY FUND (THE "FUND") IS A REGULATED INVESTMENT COMPANY THAT DISTRIBUTES NET INVESTMENT INCOME MONTHLY. FOR THE MONTHLY NET INVESTMENT INCOME DISTRIBUTIONS PAID BY THE FUND FOR THE 2016 CALENDAR YEAR, 57.1181% OF EACH DISTRIBUTION IS CONSIDERED A NON-TAXABLE RETURN OF CAPITAL PLEASE SEE THE ATTACHMENT TO IRS FORM 8937 FOR MORE DETAIL 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 ► FOR THE DISTRIBUTIONS REFERENCED ABOVE, 57.1181% SHOULD BE TREATED AS A NON-TAXABLE RETURN OF CAPITAL. PLEASE SEE THE ATTACHMENT TO IRS FORM 8937 FOR MORE DETAIL 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 ► THE BASIS OF EACH SHAREHOLDER OF RECORD ON THE DISTRIBUTION DATES REFERENCES IN THE ATTACHEMENT TO IRS FORM 8937 SHALL BE REDUCED BY 57.1181% OF THE AMOUNTS RECEIVED. THIS AMOUNT WAS DETERMINED IN ACCORDANCE WITH IRC SECTIONS 301 AND 316

Part		Organizational Action (continued)			
	st the	applicable Internal Revenue Code section((s) and subsection(s) upon which the tax tre	eatment is based ▶	IRC SECTIONS 301 AND
316.					
			S WOULD NOT BE RECOGNIZED AS PAR		
			O BE ADJUSTED BY THE AMOUNT OF T	THE DISTRIBUTIO	N THAT WOULD AFFECT
REALIZ	ED G	AIN OR LOSS RECOGNIZED ON THE DIS	SPOSITION OF FUND SHARES.		
			nent the adjustment, such as the reportable	e tax year ► <u>THE A</u>	MOUNTS AS REPORTED
ABOVE	ARE	REPORTABLE FOR THE 2016 TAX YEAR	κ.		
Ciana	Unde belief	r penalties of perjury, I declare that I have exam, it is true, correct, and complete. Declaration of	nined this return, including accompanying schedu preparer (other than officer) is based on all inform	ules and statements, nation of which prepa	and to the best of my knowledge an rer has any knowledge.
Sign Here	Signa	ture ▶	Date ►		
	Print	your name ►		Title ►	DTW
Paid Prepa	arer	Print/Type preparer's name	Preparer's signature	Date	Check if if self-employed
Use (Firm's name ▶			Firm's EIN ▶
230 (y	Firm's address ▶			Phone no.

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054

				NON-DIVIDEND			
				TOTAL	ORDINARY	DISTRIBUTION	RETURN OF
	RECORD			DISTRIBUTION	DISTRIBUTION	(RETURN OF	CAPITAL
ISSUER'S NAME	DATE	EX-DATE	PAYABLE DATE	PER SHARE	PER SHARE	CAPITAL)	PERCENTAGE
SPIRIT OF AMERICA INCOME & OPPORTUNITY FUND - A	DAILY	DAILY	2/1/2016	\$ 0.020958030	\$0.008987210	\$0.011970820	57.1181%
BOX 10 CUSIP NUMBER: 84860V104	DAILY	DAILY	3/1/2016	\$ 0.036737147	\$0.015753602	\$0.020983545	57.1181%
BOX 12 TICKER SYMBOL: SOAOX	DAILY	DAILY	4/1/2016	\$ 0.034845257	\$0.014942323	\$0.019902934	57.1181%
	DAILY	DAILY	5/2/2016	\$ 0.035381101	\$0.015172103	\$0.020208998	57.1181%
	DAILY	DAILY	6/1/2016	\$ 0.038082536	\$0.016330531	\$0.021752005	57.1181%
	DAILY	DAILY	7/1/2016	\$ 0.034610428	\$0.014841624	\$0.019768804	57.1181%
	DAILY	DAILY	8/1/2016	\$ 0.036758682	\$0.015762837	\$0.020995845	57.1181%
	DAILY	DAILY	9/1/2016	\$ 0.036866236	\$0.015808958	\$0.021057278	57.1181%
	DAILY	DAILY	10/3/2016	\$ 0.034400542	\$0.014751620	\$0.019648922	57.1181%
	DAILY	DAILY	11/1/2016	\$ 0.035760150	\$0.015334647	\$0.020425503	57.1181%
	DAILY	DAILY	12/1/2016	\$ 0.034550559	\$0.014815951	\$0.019734608	57.1181%
	DAILY	DAILY	1/3/2017	\$ 0.045539578	\$0.019528255	\$0.026011323	57.1181%
	54414	5.44.17	4440040		************	***********	==
SPIRIT OF AMERICA INCOME & OPPORTUNITY FUND - C	DAILY	DAILY	4/1/2016	\$ 0.026374888	\$0.011310064	\$0.015064824	57.1181%
BOX 10 CUSIP NUMBER: 84860V609	DAILY	DAILY	5/2/2016	\$ 0.031086284	\$0.013330402	\$0.017755882	57.1181%
BOX 12 TICKER SYMBOL: SACOX	DAILY	DAILY	6/1/2016	\$ 0.025203542	\$0.010807768	\$0.014395774	57.1181%
	DAILY	DAILY	7/1/2016	\$ 0.029686467	\$0.012730133	\$0.016956334	57.1181%
	DAILY	DAILY	8/1/2016	\$ 0.031133671	\$0.013350723	\$0.017782948	57.1181%
	DAILY	DAILY	9/1/2016	\$ 0.022636756	\$0.009707080	\$0.012929676	57.1181%
	DAILY	DAILY	10/3/2016	\$ 0.028338511	\$0.012152104	\$0.016186407	57.1181%
	DAILY	DAILY	11/1/2016	\$ 0.024990212	\$0.010716288	\$0.014273924	57.1181%
	DAILY	DAILY	12/1/2016	\$ 0.029947956	\$0.012842265	\$0.017105691	57.1181%
	DAILY	DAILY	1/3/2017	\$ 0.035345825	\$0.015156976	\$0.020188849	57.1181%