

**Report of Organizational Actions
Affecting Basis of Securities**

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name SPIRIT OF AMERICA INCOME & OPPORTUNITY FUND		2 Issuer's employer identification number (EIN) 46-2996407	
3 Name of contact for additional information ALAN P. CHODOSH	4 Telephone No. of contact (516) 390-5525	5 Email address of contact APCHODOSH@DAVIDLERNER.COM	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 477 JERICHO TURNPIKE		7 City, town, or post office, state, and Zip code of contact SYOSSET, NY 11791	
8 Date of action SEE ATTACHED		9 Classification and description REGULATED INVESTMENT COMPANY (RIC) SHARES	
10 CUSIP number 84860V104	11 Serial number(s) N/A	12 Ticker symbol SOAOX	13 Account number(s) N/A

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 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 2014 CALENDAR YEAR, 34.3117% OF EACH DISTRIBUTION IS CONSIDERED A NON-TAXABLE RETURN OF CAPITAL. ATTACHMENT TO IRS FORM 8937 FOR MORE DETAIL.**

15 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, 34.3117% SHOULD BE TREATED AS A NON-TAXABLE RETURN OF CAPITAL. PLEASE SEE THE ATTACHMENT TO IRS FORM 8937 FOR MORE DETAIL.**

16 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 34.3117% OF THE AMOUNTS RECEIVED. THIS AMOUNT WAS DETERMINED IN ACCORDANCE WITH IRC SECTIONS 301 AND 316.**

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ **IRC SECTIONS 301 AND 316.**

18 Can any resulting loss be recognized? ▶ **A LOSS WOULD NOT BE RECOGNIZED AS PART OF THE DISTRIBUTIONS. THE BASIS OF EACH SHAREHOLDER OF RECORD WOULD NEED TO BE ADJUSTED BY THE AMOUNT OF THE DISTRIBUTION THAT WOULD AFFECT REALIZED GAIN OR LOSS RECOGNIZED ON THE DISPOSITION OF FUND SHARES**

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ **THE AMOUNTS AS REPORTED ABOVE ARE REPORTABLE FOR THE 2014 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 ▶ _____
Print your name ▶ _____ Title ▶ _____

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.

ISSUER'S NAME	RECORD DATE	EX-DATE	PAYABLE DATE	TOTAL DISTRIBUTION PER SHARE	ORDINARY DISTRIBUTION PER SHARE	NON-DIVIDEND DISTRIBUTION (RETURN OF CAPITAL)	RETURN OF CAPITAL PERCENTAGE
SPIRIT OF AMERICA INCOME & OPPORTUNITY FUND	DAILY	DAILY	01/15/2014	\$ 0.015585182	\$ 0.010237644	\$ 0.005347538	34.3117%
BOX 10 CUSIP NUMBER: 84860V104	DAILY	DAILY	02/03/2014	\$ 0.013468021	\$ 0.008846917	\$ 0.004621104	34.3117%
BOX 12 TICKER SYMBOL: SOAOX	DAILY	DAILY	03/03/2014	\$ 0.021135223	\$ 0.013883373	\$ 0.007251850	34.3117%
	DAILY	DAILY	04/01/2014	\$ 0.039962279	\$ 0.026250550	\$ 0.013711729	34.3117%
	DAILY	DAILY	05/01/2014	\$ 0.046185000	\$ 0.030338151	\$ 0.015846849	34.3117%
	DAILY	DAILY	06/02/2014	\$ 0.044553295	\$ 0.029266311	\$ 0.015286984	34.3117%
	DAILY	DAILY	07/01/2014	\$ 0.039154099	\$ 0.025719670	\$ 0.013434429	34.3117%
	DAILY	DAILY	08/01/2014	\$ 0.038841258	\$ 0.025514170	\$ 0.013327088	34.3117%
	DAILY	DAILY	09/02/2014	\$ 0.044090851	\$ 0.028962540	\$ 0.015128311	34.3117%
	DAILY	DAILY	10/01/2014	\$ 0.054370237	\$ 0.035714896	\$ 0.018655341	34.3117%
	DAILY	DAILY	11/03/2014	\$ 0.063165325	\$ 0.041492241	\$ 0.021673084	34.3117%
	DAILY	DAILY	12/01/2014	\$ 0.049896073	\$ 0.032775892	\$ 0.017120181	34.3117%
	DAILY	DAILY	01/02/2015	\$ 0.072874566	\$ 0.047870079	\$ 0.025004487	34.3117%