

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

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
SPIRIT OF AMERICA REAL ESTATE INCOME AND GROWTH FUND		11-3383517	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
ALAN P. CHODOSH	(516) 390-5525	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	N/A	SEE ATTACHED	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 REAL ESTATE INCOME AND GROWTH FUND (THE "FUND") IS A REGULATED INVESTMENT COMPANY THAT MADE NET INVESTMENT INCOME DISTRIBUTIONS FOR THE 2013 CALENDAR YEAR. FOR THE NET INVESTMENT INCOME DISTRIBUTIONS PAID BY THE FUND FOR THE 2013 CALENDAR YEAR, 70.7930% OF EACH DISTRIBUTION IS CONSIDERED A NON-TAXABLE RETURN OF CAPITAL. PLEASE SEE THE 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, 70.7930% 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 70.7930% 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 2013 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 ▶ **Signature on File** Date ▶ _____

Print your name ▶ [Signed copy on file with the taxpayer](#) 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	BOX 10	BOX 12	RECORD	EX-DATE	PAYABLE	TOTAL	ORDINARY	NON-DIVIDEND	RETURN OF
	CUSIP	TICKER				DISTRIBUTION	DISTRIBUTION	DISTRIBUTION	CAPITAL
	NUMBER	SYMBOL	DATE		DATE	PER SHARE	PER SHARE	(RETURN OF	PERCENTAGE
SPIRIT OF AMERICA REAL ESTATE INCOME AND GROWTH FUND - A	848604104	SOAAX	03/27/2013	03/28/2013	03/28/2013	\$ 0.025900000	0.007564606	0.018335394	70.7930%
			06/27/2013	06/28/2013	06/28/2013	\$ 0.020000000	0.005841395	0.014158605	70.7930%
			09/26/2013	09/27/2013	09/27/2013	\$ 0.072600000	0.021204264	0.051395736	70.7930%
SPIRIT OF AMERICA REAL ESTATE INCOME AND GROWTH FUND - B	848604203	SOABX	03/27/2013	03/28/2013	03/28/2013	\$ 0.004800000	0.001401935	0.003398065	70.7930%