

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 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	(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 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 2017 CALENDAR YEAR, 20.9351% 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, 20.9351% 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 REFERENCED IN THE ATTACHEMENT TO IRS FORM 8937 SHALL BE REDUCED BY 20.9351% 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 2017 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 ▶ Alan P. Chodosh Date ▶ 2-12-18
Print your name ▶ Alan P Chodosh Title ▶ Treasurer

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			TOTAL	ORDINARY	NON-DIVIDEND	RETURN OF
	DATE	EX-DATE	PAYABLE DATE	DISTRIBUTION PER SHARE	DISTRIBUTION PER SHARE	DISTRIBUTION (RETURN OF CAPITAL)	CAPITAL PERCENTAGE
SPIRIT OF AMERICA INCOME & OPPORTUNITY FUND - A BOX 10 CUSIP NUMBER: 84860V104 BOX 12 TICKER SYMBOL: SOAOX	DAILY	DAILY	2/1/2017	\$ 0.024802719	\$0.019610240	\$0.005192479	20.9351%
	DAILY	DAILY	3/1/2017	\$ 0.031115609	\$0.024601519	\$0.006514090	20.9351%
	DAILY	DAILY	4/3/2017	\$ 0.031857501	\$0.025188095	\$0.006669406	20.9351%
	DAILY	DAILY	5/1/2017	\$ 0.033417397	\$0.026421425	\$0.006995972	20.9351%
	DAILY	DAILY	6/1/2017	\$ 0.035297353	\$0.027907810	\$0.007389543	20.9351%
	DAILY	DAILY	7/3/2017	\$ 0.032899937	\$0.026012296	\$0.006887641	20.9351%
	DAILY	DAILY	8/1/2017	\$ 0.034883070	\$0.027580257	\$0.007302813	20.9351%
	DAILY	DAILY	9/1/2017	\$ 0.035554055	\$0.028110771	\$0.007443284	20.9351%
	DAILY	DAILY	10/2/2017	\$ 0.033133323	\$0.026196822	\$0.006936501	20.9351%
	DAILY	DAILY	11/1/2017	\$ 0.034775162	\$0.027494940	\$0.007280222	20.9351%
	DAILY	DAILY	12/1/2017	\$ 0.037529971	\$0.029673027	\$0.007856944	20.9351%
	DAILY	DAILY	1/2/2018	\$ 0.051006323	\$0.040328088	\$0.010678235	20.9351%
	SPIRIT OF AMERICA INCOME & OPPORTUNITY FUND - C BOX 10 CUSIP NUMBER: 84860V609 BOX 12 TICKER SYMBOL: SACOX	DAILY	DAILY	2/1/2017	\$ 0.023522880	\$0.018598337	\$0.004924543
DAILY		DAILY	3/1/2017	\$ 0.027933539	\$0.022085619	\$0.005847920	20.9351%
DAILY		DAILY	4/3/2017	\$ 0.033621855	\$0.026583079	\$0.007038776	20.9351%
DAILY		DAILY	5/1/2017	\$ 0.028033962	\$0.022165018	\$0.005868944	20.9351%
DAILY		DAILY	6/1/2017	\$ 0.026703020	\$0.021112711	\$0.005590309	20.9351%
DAILY		DAILY	7/3/2017	\$ 0.031081109	\$0.024574242	\$0.006506867	20.9351%
DAILY		DAILY	8/1/2017	\$ 0.027298872	\$0.021583820	\$0.005715052	20.9351%
DAILY		DAILY	9/1/2017	\$ 0.026984013	\$0.021334878	\$0.005649135	20.9351%
DAILY		DAILY	10/2/2017	\$ 0.030100788	\$0.023799152	\$0.006301636	20.9351%
DAILY		DAILY	11/1/2017	\$ 0.023846930	\$0.018854547	\$0.004992383	20.9351%
DAILY		DAILY	12/1/2017	\$ 0.031190115	\$0.024660427	\$0.006529688	20.9351%
DAILY		DAILY	1/2/2018	\$ 0.031059963	\$0.024557523	\$0.006502440	20.9351%