

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(C), 302, 354, 356, 358, AND 368 (A)

18 Can any resulting loss be recognized? ► NO LOSS CAN BE RECOGNIZED UPON THE CONVERSION OF CLASS B SHARES INTO CLASS A SHARES.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► THE ADJUSTMENT TO BASIS WOULD BE TAKEN INTO ACCOUNT IN THE TAX YEAR OF THE SHAREHOLDERS DURING WHICH THE REVERSE STOCK SPLIT WAS EFFECTIVE (E.G. 2021 FOR CALENDAR YEAR TAXPAYERS).

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 ► *Christopher Masterson* Date ► 02/07/2022

Print your name ► CHRISTOPHER MASTERSON Title ► CHIEF FINANCIAL OFFICER

Paid Preparer Use Only

Print/Type preparer's name <u>V. EDWARD BOZEMAN</u>	Preparer's signature <u><i>V. Edward Bozeman</i></u>	Date <u>8/13/21</u>	Check <input type="checkbox"/> if self-employed	PTIN <u>P00742238</u>
Firm's name ► <u>DELOITTE TAX LLP</u>		Firm's EIN ► <u>86-1065772</u>		
Firm's address ► <u>191 PEACHTREE STREET, STE 2000 ATLANTA, GA 30303</u>		Phone no. <u>404-220-1500</u>		

New York City REIT, Inc.
46-4380248

Attachment to Form 8937

REPORTS OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES

Form 8937 Part II, Box 15:

The recapitalization of each share of common stock is treated as an exchange of the existing Class B common stock for Class A Common Stock in a transaction that qualifies as a tax-free reorganization under section 368(a)(1)(E). Under section 358, the adjusted basis of each share surrendered (or deemed surrendered) is allocated to the share of stock received in proportion to its fair market value. The shareholders' aggregate tax basis in each share of Class A Common Stock received will equal the aggregate tax basis in the original Class B Common Shares surrendered in the transaction.

Under section 358(a) of the Code, in the exchange of Class B Common stock, the shareholders' aggregate tax basis in the Class A stock received is equal to the basis in the Class B Common previously held. Stock previously held.