

**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)	
810 Seventh Avenue Member		47-1915505	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Adam Nelms	678-651-2643	A.Nelms@kanam-grund-america.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	
P.O. Box 51884		Washington, DC 20091	
8 Date of action		9 Classification and description	
March 31; September 30		Dividends to Series A 12% Preferred Unit Holders	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
N/A	N/A	N/A	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 ▶ 810 Seventh Avenue Member made cash distributions to Series A 12% preferred shareholders on the dates listed here. These distributions represent a non-dividend distribution as provided under #15.

- 1) On March 31, 2016, 810 paid cash distributions on preferred stock of \$60.00 to shareholders of record on March 22, 2016.
- 2) On September 30, 2016, 810 paid cash distributions on preferred stock of \$60.00 to shareholders of record on September 21, 2016.

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 ▶ The amounts below represent either a return of capital to each shareholder or capital gain if basis is insufficient.

- 1) On March 31, 2016 - \$60.00 per share or 12%
- 2) On September 30, 2016 - \$60.00 per share or 12%

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 ▶ Earnings and profits were calculated under IRC Section 312 as modified by IRC Section 857(d) applicable to Real Estate Investment Trusts. Distributions are treated as taxable dividends to the extent of earnings and profits. Distributions in excess of earnings and profits allocable to the shareholders reduce the shareholder's tax basis in its shares but not below zero.

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 Section 301(c)(2), IRC Section 316, IRC Section 857

18 Can any resulting loss be recognized? ▶ No

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year ending December 31, 2016.

Sign Here

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.

Signature ▶  Kyn Sung Lee 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
	Lorraine White	White, Lorraine	2/10/17		P00185124
	Firm's name ▶ Grant Thornton LLP	Firm's address ▶ 1000 Wilson Blvd, Suite 1400 Arlington VA 22209		Firm's EIN ▶ 36-6055558	Phone no. 703-847-7500