## Department of the Treasury

## Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

| Internal Revenue Service  |                                       |                    | See separate instructions.        |  |  |  |  |
|---|---------------------------------------|--------------------|-----------------------------------|--|--|--|--|
| Part I Reporti  | ng Issuer                             |                    |                                   | •  |  |  |  |
| 1 Issuer's name   |                                       |                    |                                   | 2 Issuer's employer identification number (EIN)              |  |  |  |
| CORPORATE PROP  | ERTY ASSOCIATES                       | 90-0885534         |                                   |  |  |  |  |
| 3 Name of contact for additional information 4 Telephone No. of contact |                                       |                    |                                   | 5 Email address of contact                                   |  |  |  |
| LIOU GUO  |                                       | 212-492-           | 1161                              |  |  |  |  |
|   | (or P.O. box if mail is not           |                    | street address) of contact        | 7 City, town, or post office, state, and ZIP code of contact |  |  |  |
|   | (                                     |                    |                                   | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,                       |  |  |  |
|   | PLAZA, 2ND FLO                        | NEW YORK, NY 10020 |                                   |  |  |  |  |
| 8 Date of action  |                                       | 9 Class            | sification and description        |  |  |  |  |
| SEE BELOW   |                                       | CLASS              | C COMMON STOCK                    |  |  |  |  |
| 10 CUSIP number 11 Serial number(s)                                     |                                       | (s)                | 12 Ticker symbol                  | 13 Account number(s)   |  |  |  |
| 00004-000   |                                       |                    |                                   |  |  |  |  |
| 22004E208 Part II Organiz   | rational Action Atta                  | ch additiona       | I statements if needed See        | back of form for additional questions.                       |  |  |  |
|   |                                       |                    |                                   | against which shareholders' ownership is measured for        |  |  |  |
|   |                                       |                    |                                   | C. ("TAXPAYER") MADE CASH                                    |  |  |  |
|   |                                       |                    |                                   | ENT AND ACCUMULATED EARNINGS AND                             |  |  |  |
|   |                                       |                    |                                   | DISTRIBUTIONS PER SHARE.                                     |  |  |  |
|   | ·                                     |                    |                                   |  |  |  |  |
|   |                                       |                    |                                   |  |  |  |  |
|   |                                       |                    |                                   |  |  |  |  |
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|   |                                       |                    |                                   |  |  |  |  |
|   |                                       |                    |                                   |  |  |  |  |
| 15 Describe the quar  | ntitative effect of the orga          | anizational act    | tion on the basis of the security | in the hands of a U.S. taxpayer as an adjustment per         |  |  |  |
| share or as a perc  | centage of old basis $ ightharpoonup$ | HE DISTR           | IBUTIONS REDUCED T                | HE BASIS OF THE SECURITY OF THE                              |  |  |  |
| U.S. TAXPAYER   | AS FOLLOWS:                           |                    |                                   |  |  |  |  |
|   |                                       |                    |                                   |  |  |  |  |
| DATE: PER SHARE REDUCTION OF BASIS:                                     |                                       | ASIS:              |                                   |  |  |  |  |
| CL.   | ASS C COMMON ST                       | rock               |                                   |  |  |  |  |
| 1/15/19 \$0   | .0805885                              |                    |                                   |  |  |  |  |
|   | .0804128                              |                    |                                   |  |  |  |  |
|   | .0805885                              |                    |                                   |  |  |  |  |
|   | ·                                     |                    |                                   |  |  |  |  |
|   |                                       |                    |                                   |  |  |  |  |
|   |                                       |                    |                                   |  |  |  |  |
| 16 Describe the calc  | ulation of the change in I            | pasis and the      | data that supports the calculat   | ion, such as the market values of securities and the         |  |  |  |
| valuation dates ►   | THE TAXPAYER'S                        | EARNING            | AND PROFITS WERE (                | CALCULATED UNDER IRC 312 (AS                                 |  |  |  |
| MODIFIED BY IR  | C 857(d) FOR A                        | REAL EST           | CATE INVESTMENT TRU               | ST), AND THE REGULATIONS                                     |  |  |  |
| THEREUNDER. AM  | OUNTS IN EXCESS                       | OF EARN            | NING AND PROFITS RE               | DUCE THE SHAREHOLDER'S TAX BASIS                             |  |  |  |
| IN IT SHARES T  | O THE EXTENT OF                       | BASIS.             |                                   |  |  |  |  |
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| Pai                  | t II   | Organizational Action (continued)  |                          |  |
|----------------------|--------|--|--------------------------|--|
| 17                   |        | applicable Internal Revenue Code section(s) and subsection(s) upon which the tax   | treatment is based ▶     | IRC 301(c)(2)  |
|                      |        |  |                          |  |
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| 18                   | Can ar | y resulting loss be recognized? ► NO   |                          |  |
|                      |        |  |                          |  |
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| 19                   | Provid | any other information necessary to implement the adjustment, such as the reportal  | ole tax year ▶ THESI     | E ACTIONS ARE  |
| EFF                  |        | E ON THE DATES OF THE DISTRIBUTION IDENTIFIED ABOV   |                          |  |
|                      |        |  |                          |  |
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|                      | _      |  |                          |  |
|                      | Und    | er penalties of perjury, I declare that I have examined this return, including accompanying sch-<br>f, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all info  | edules and statements, a | and to the best of my knowledge and er has any knowledge |
| Sigr                 |        | , the trady contest, and complete Estatation of property (enter that of the state o | manon or milen propart   | or nad any mid-modge.                                    |
| Her                  | _      | atura lailan   | Date ► 2/5/20            |  |
|                      | Sigr   | ature • Million  | Date ► <u>2/5/20</u>     |  |
|                      | Prin   | your name ► LIOU GUO   | Title ► SENIOR           | VP - DOMESTIC TAX  |
| Paid                 | •      | Print/Type preparer's name  Preparer's signature   | Date                     | Check if PTIN  |
|                      |        | KELLY S. NOBIS Kella S. Moles  | 01/27/2020               | self-employed P01432777                                  |
| Preparer<br>Use Only |        | 1007   |                          | Firm's EIN ▶13-4008324                                   |
|                      |        | Firm's address ▶ 300 MADISON AVENUE, NEW YORK, NY 10017  |                          | Phone no. 646-471-3000                                   |

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054