

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ See attachment.

Multiple horizontal lines for listing applicable Internal Revenue Code sections and subsections.

18 Can any resulting loss be recognized? ▶ See attachment.

Multiple horizontal lines for providing information regarding loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ See attachment.

Multiple horizontal lines for providing other necessary information for the adjustment.

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 ▶ Karen A. Allen Date ▶ 1/15/21

Print your name ▶ Karen A. Allen Title ▶ CFO/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 ▶		Phone no.	
Firm's address ▶				

HUMPHREYS FUND I REIT, LLC

RETURN OF CAPITAL DISTRIBUTIONS ATTACHMENT TO FORM 8937

Part I

Line 8.	Date of Action
	January 2, 2020
	February 1, 2020
	March 2, 2020
	April 1, 2020
	May 1, 2020
	June 1, 2020
	July 1, 2020
	August 3, 2020
	September 2, 2020
	October 1, 2020
	November 2, 2020
	December 1, 2020

PART II

LINE 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.

On the dates listed in Line 8 above, Humphreys Fund I REIT, LLC made cash distributions to its common shareholder in excess of its current and accumulated earnings and profits.

PART III

Line 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.

As the value of Humphreys Fund I REIT, LLC's total cash distributions for the REIT's 2020 taxable year exceeded its current and accumulated earnings and profits in the same taxable year, a portion of each distribution is treated as a return of capital that reduced each shareholder's adjusted tax basis in its common shares, to the extent that such distributions do not exceed the shareholder's adjusted basis in such common shares. The per-share reduction of each shareholder's basis in Humphreys Fund I REIT, LLC's common shares as a percentage of old basis is as follows

<u>Payment Date</u>	<u>Reduction in Basis</u>
January 2, 2020	
February 1, 2020	
March 2, 2020	
April 1, 2020	
May 1, 2020	
June 1, 2020	
July 1, 2020	
August 3, 2020	
September 2, 2020	
October 1, 2020	
November 2, 2020	
December 1, 2020	
	<u>4.00000%</u>

Part III, Line 15 information presented on an estimated basis. As soon as the actual amount of return of capital is known, Form 8937 will be amended.

Line 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.

Humphreys Fund I REIT LLC's earnings and profits for purposes of calculating the per-share percentage reduction in basis were computed in accordance with Section 312 of the Code as modified by Section 857(d) for a real estate investment trust and the regulations thereunder. Amounts in excess of earnings and profits reduce the shareholder's basis in its common shares to the extent of the shareholder's basis in those shares.

Line 17. List the applicable Internal Revenue Code section(s) and subsection(s) upon which treatment is based.

Section 301(c) is the applicable Code section upon which the tax treatment of the amounts distributed by the REIT is based.

Line 18. Can any resulting loss be recognized?

No resulting loss can be recognized as a result of distributions made by the REIT.

Line 19. Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The basis adjustment referred to in Lines 14-18 above should be taken into account for the 2020 calendar tax year.