

## Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

**Part I Reporting Issuer**

1 Issuer's name  CIM COMMERCIAL TRUST CORPORATION		2 Issuer's employer identification number (EIN)  75-6446078	
3 Name of contact for additional information  DAVID THOMPSON	4 Telephone No. of contact  323-860-4900	5 Email address of contact  investors@cimcommercial.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact  17950 PRESTON ROAD, SUITE 600		7 City, town, or post office, state, and Zip code of contact  DALLAS, TX 75252	
8 Date of action  SEE QUESTION 14		9 Classification and description  STOCK	
10 CUSIP number  125525105	11 Serial number(s)  N/A	12 Ticker symbol  CMCT	13 Account number(s)  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 ▶ DURING 2016, CIM COMMERCIAL TRUST DECLARED THE FOLLOWING DIVIDENDS:

ORGANIZATION ACTION #1: A) RECORD DATE: 3/21/2016 B) PAYMENT DATE: 3/29/2016

ORGANIZATION ACTION #2: A) RECORD DATE: 6/21/2016 B) PAYMENT DATE: 6/28/2016

ORGANIZATION ACTION #3: A) RECORD DATE: 9/22/2016 B) PAYMENT DATE: 9/28/2016

ORGANIZATION ACTION #4: A) RECORD DATE: 12/16/2016 B) PAYMENT DATE: 12/23/2016

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**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 ▶ A PORTION OF THE DIVIDEND NOTED ABOVE WILL BE TREATED AS A RETURN OF CAPITAL IN ACCORDANCE WITH IRC SECTION 301(c)(2). FOR THE DIVIDENDS DECLARED DURING ABOVE DATES, 90.37% OF THE TOTAL DISTRIBUTION WILL BE CHARACTERIZED AS RETURN OF CAPITAL.

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**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 TAXPAYER'S EARNINGS AND PROFITS WERE CALCULATED UNDER IRC SECTION 312, AS MODIFIED BY IRC SECTION 875(d) FOR REAL ESTATE INVESTMENT TRUST AND REGULATIONS THEREUNDER.

FOR EACH DISTRIBUTION MENTIONED IN LINE 14 ABOVE, THE ANALYSIS OF THE EARNINGS AND PROFITS DETERMINED THAT THE CASH DISTRIBUTIONS EXCEEDED EARNINGS AND PROFITS. THEREFORE, THE DIFFERENCE BETWEEN THE CASH DISTRIBUTIONS AND CURRENT EARNINGS AND PROFITS WILL BE CHARACTERIZED AS A RETURN OF CAPITAL, A REDUCTION OF TAX BASIS OF THE ISSUER'S STOCK.

**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); 312, 316(a); 317(a)

18 Can any resulting loss be recognized? ▶ NO.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ N/A

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 ▶  Date ▶ 3-21-17

Print your name ▶ DAVID THOMPSON Title ▶ CFO

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	WILLIAM T. ATKIELS		03/08/2017		P00360632
	Firm's name ▶ PRICEWATERHOUSECOOPERS LLC			Firm's EIN ▶ 13-4008324	
	Firm's address ▶ 2001 ROSS AVENUE, SUITE 1800, DALLAS TX 75201			Phone no. 214-999-1400	

**PMC Commerical Trust**  
**EIN: 75-6446078**  
**Form 8937 - Accompanying Statement**  
**For the Year Ended December 31, 2016**

The Taxpayer was not able to determine the quantitative effect on the shareholder's basis from distributions made on the date(s) identified above. The Taxpayer is filing the Form 8937 timely, in accordance with Reg. Section 1.6045B-1(a)(2)(ii), within 45 days of making that determination.