Form **8937** (December 2017) Department of the Treasury Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

OMB No. 1545-0123

Part I Reporting Issuer

1 Issuer's name STORE CAPITAL CORPORATION	2 Issuer's employer identification number (EIN) 45-2280254

3 Name of contact for additional information JULIE N. BENNETT	4 Telephone No. of contact 480-256-1100	5 Email address of contact JBENNETT@STORECAPITAL.COM

6 Number and street (or P.O. box if mail is not delivered to street address) of contact 8377 E. HARTFORD DR. STE. 100	7 City, town, or post office, state, and ZIP code of contact SCOTTSDALE, AZ 85255

8 Date of action VARIOUS - SEE #14 BELOW	9 Classification and description COMMON STOCK

10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
862 121 100		STOR	

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 ▶ CASH DISTRIBUTIONS TO COMMON STOCKHOLDERS IN EXCESS OF EARNINGS & PROFITS WERE MADE ON THE FOLLOWING DATES: 01/15/19; 04/15/19; 07/15/19; 10/15/19

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 ▶

01/15/19; $0.3143 DISTRIBUTION PER SHARE; $0.0008 RETURN OF CAPITAL PER SHARE*
04/15/19; $0.3300 DISTRIBUTION PER SHARE; $0.0008 RETURN OF CAPITAL PER SHARE
07/15/19; $0.3300 DISTRIBUTION PER SHARE; $0.0008 RETURN OF CAPITAL PER SHARE
10/15/19; $0.3500 DISTRIBUTION PER SHARE; $0.0009 RETURN OF CAPITAL PER SHARE

*THE 01/15/19 DISTRIBUTION PER SHARE OF $0.3300 HAS BEEN REDUCED BY $0.0157 FOR DISTRIBUTIONS THAT WERE TREATED AS PAID ON 12/31/18 IN ACCORDANCE WITH IRC SECTION 857(B)(9)

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 ▶ DISTRIBUTIONS IN EXCESS OF EARNINGS & PROFITS ARE APPLIED AGAINST AND REDUCE THE ADJUSTED BASIS OF 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

18 Can any resulting loss be recognized? ▶ N/A

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

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 ▶ Date ▶ 2/6/2020

Print your name ▶ JULIE N. BENNETT Title ▶ SVP - TAX

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
Firm's name ▶			Firm's EIN ▶	
Firm's address ▶			Phone no.	