

**Report of Organizational Actions
 Affecting Basis of Securities**

▶ See separate instructions.

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 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 8501 E. PRINCESS DR., SUITE 190		7 City, town, or post office, state, and Zip code of contact SCOTTSDALE, AZ 85255	
8 Date of action NOVEMBER 4, 2014	9 Classification and description COMMON STOCK		
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)

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 ▶ **On November 3, 2014, the organization authorized a stock dividend of 0.67 of a share of common stock of the corporation for each outstanding share of common stock, payable on November 4, 2014 to stockholders of record on November 3, 2014.**

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 ▶ **Basis of each share of stock and respective stock dividends will be 0.5988024% of the basis of the stock immediately before the transaction.**

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 ▶ **Basis of the stock immediately before the transaction is allocated among the existing stock and stock dividends according to relative number of shares. Outstanding common stock immediately before the transaction was 49,950,676 and increased as a result of the transaction to 83,417,633.**

Part I Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ I.R.C. Sections 305 and 307

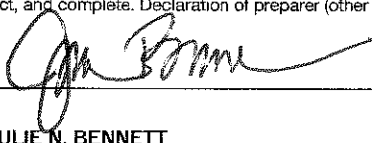
18 Can any resulting loss be recognized? ▶ Not Applicable

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

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 ▶

12/18/14

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.