Form **8937** (December 2011) Department of the Treasury Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

OMB No. 1545-2224

Part I Reporting Issuer

1 Issuer's name: AMERICAN REALTY CAPITAL TRUST IV, INC.	2 Issuer's employer identification number (EIN): 32-0372241
3 Name of contact for additional information: CHARLES P. ANASTASIA	4 Telephone No. of contact: 646-381-0589
5 Email address of contact: CANASTASIA@ARLCAP.COM	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact: 106 YORK ROAD	7 City, town, or post office, state, and Zip code of contact: JENKINTOWN, PA, 19046
8 Date of action: JANUARY 3, 2014	9 Classification and description: COMMON STOCK
10 CUSIP number: 02917X105	11 Serial number(s): NOT APPLICABLE
12 Ticker symbol: NOT APPLICABLE	13 Account number(s): NOT APPLICABLE

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 ▶ SEE ATTACHMENT

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 ▶ SEE ATTACHMENT

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 ▶ SEE ATTACHMENT

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 SECTIONS 331, 336, 368(a), 1001 AND 1221.

18 Can any resulting loss be recognized? ▶ SEE ATTACHMENT

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ THE TRANSACTION WAS CONSUMMATED ON JANUARY 3, 2014. CONSEQUENTLY, THE REPORTABLE TAXABLE YEAR OF THE ARC IV SHAREHOLDERS FOR REPORTING THE TAXABLE MERGER IS THE TAXABLE YEAR THAT INCLUDES THE JANUARY 3, 2014 DATE.

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 ▶ Ch P C Date ▶ 3-26-14

Print your name ▶ Charles P. Anastasia Title ▶ SVP of Tax

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
JAMES A. OSWALD				P01275389
Firm's name ▶ PRICEWATERHOUSECOOPERS LLP			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

AMERICAN REALTY CAPITAL TRUST IV, INC.
EIN: 32-0372241
ATTACHMENT TO FORM 8937

Form 8937 Part II, Box 14:
The organizational action involves the merger pursuant to which, on January 3, 2014, American Realty Capital Trust IV, Inc. (EIN 32-0372241) ("ARCT IV"), merged into American Realty Capital Properties, Inc. (EIN 45-2482685) with American Realty Capital Properties, Inc. ("ARCP") surviving the merger. At the effective time of the merger, each issued and outstanding share of ARCT IV common stock will be converted into the right to receive per share (1) $9.00 in cash; (2) 0.5190 of a share, or the Common Exchange Ratio, of common stock of ARCP, par value $0.01 per share; and (3) 0.5937 of a share, or the Preferred Exchange Ratio, of ARCP's 6.70% Series F Cumulative Redeemable Preferred Stock, par value $0.01 per share, or the Series F Preferred Stock.

Instead of fractional shares, ARCT IV stockholders will receive cash, without interest, in an amount equal to (a) in the case of ARCP common stock; the product of (i) such fractional part of a share of ARCP common stock, multiplied by (ii) the per share closing price of ARCP's common stock on the NASDAQ on the date of the closing of the mergers, as reported in the Wall Street Journal, and (b) in the case of Series F Preferred Stock; the product of (i) such fractional part of Series F Preferred Stock; multiplied by (ii) $25.00.

ARCP stockholders continued to hold their existing shares of ARCP common stock.

Form 8937 Part II, Box 15:
The information contained herein does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of shareholders. Further discussion of the tax consequences of the merger can be found in Amendment No. 7 to Form S-4 for ARCP, as filed with the Securities and Exchange Commission on December 3, 2013 under the heading " Material U.S. Federal Income Tax Consequences" Additionally, shareholders should consult with their tax advisor for the application of these matters to their specific circumstances.

As stated in the S-4, the merger was intended to be treated as if ARCT IV had sold all of its assets to ARCP's operating partnership in exchange for the merger consideration and then made a liquidating distribution of the merger consideration to its stockholders in exchange for its common stock.

The receipt of the merger consideration by the US stockholders in exchange for their stock pursuant to the merger will be a taxable transaction for US federal income tax purposes. In general, a US stockholder of ARCT IV stock will recognize gain or loss for US federal income tax purposes equal to the difference between (a) the amount of cash plus the fair market value of the stock consideration received by the US stockholder in exchange for ARCT IV common stock; and (b) the US stockholder's adjusted tax basis in ARCT IV common stock.

Gain or loss will be calculated separately for each block of shares of ARCT IV common stock, with a block consisting of shares acquired at the same cost in a single transaction.

The information in this document does not constitute tax advice and is not intended or written to be used, and cannot be used, for the purposes of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing, or recommending any transaction or matter addressed herein.

Form 8937 Part II, Box 16:
The change in basis (if any) will be affected as described under box 15, above, and will depend on the individual circumstances of each shareholder of ARCP common stock. Each shareholder of ARCT IV common stock received (i) $9.00 in cash, (ii) 0.5190 of a share of the company's common stock, and (iii) 0.5937 of a share of a new series of preferred stock of ARCP. The market value of the consideration is as follows (I) $9.00 in Cash, (II) $6.65 in Common Stock, and (III) $ 12.65 in Preferred Stock. Also, instead of fractional shares, ARCT IV stockholders will receive cash, without interest, in an amount equal to (a) in the case of ARCP common stock; the product of (i) such fractional part of a share of ARCP common stock, multiplied by (ii) the per share closing price of ARCP's common stock on the Nasdaq on the date of the closing of the mergers, as reported in the Wall Street Journal was $12.91 at closing on 1/3/2014 and (b) in the case of series F preferred stock; the product of (i) such fractional part of series F preferred stock; multiplied by (ii) $25.00.

Form 8937 Part II, Box 18:
For US federal income tax purposes, the merger will be treated as if ARCT IV sold all of its assets to ARCP's operating partnership in exchange for the merger consideration. The receipt of the merger considerations by the stockholders of ARCT IV will be a taxable transaction for us federal income tax purposes. In general, a US stockholder of ARCT IV will recognize gain or loss for federal income tax purposes equal to the difference between: (a) the amount of cash plus the fair market value of the stock consideration received by the us stockholder in exchange for ARCT IV common stock, and (b) the US stockholder's adjusted tax basis in ARCT IV common stock.

Furthermore, Instead of fractional shares, ARCT IV stockholders will receive cash, without interest, in an amount equal to (a) in the case of ARCP common stock; the product of (i) such fractional part of a share of ARCP common stock, multiplied by (ii) the per share closing price of ARCP's common stock on the NASDAQ on the date of the closing of the mergers, as reported in the Wall Street Journal, and (b) in the case of Series F Preferred Stock; the product of (i) such fractional part of Series F Preferred Stock; multiplied by (ii) $25.00. The cash received for fractional shares will be treated as having received such fractional share in the merger and then as having received cash in redemption of such fractional share, and may recognize loss as a result of such redemption.