



**Part II Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► \_\_\_\_\_  
**PURSUANT TO IRC SECTION 301(C)(1), THE PORTION OF A DISTRIBUTION WHICH IS A DIVIDEND (AS DEFINED UNDER IRC 316) IS INCLUDABLE IN GROSS INCOME. PURSUANT TO IRC 301(C)(2), THE PORTION OF THE DISTRIBUTION WHICH IS NOT A DIVIDEND SHALL BE APPLIED AGAINST AND REDUCE THE ADJUSTED BASIS OF THE STOCK.**

18 Can any resulting loss be recognized? ► **NOT APPLICABLE TO THIS TRANSACTION AS NO LOSS WOULD BE RECOGNIZED ON THE RETURN OF CAPITAL DISTRIBUTION. THE SHAREHOLDER'S COST BASIS SHOULD BE ADJUSTED TO REFLECT THE RETURN OF CAPITAL DISTRIBUTION WHICH MAY AFFECT THE GAIN OR LOSS REALIZED UPON THE DISPOSITION OF THE SHARES.**

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► **PURSUANT TO IRC SECTION 6045, AS AMENDED BY THE EMERGENCY ECONOMIC STABILIZATION ACT OF 2008, BROKERS ARE REQUIRED TO REFLECT THESE ADJUSTMENTS IN THE COST BASIS REPORTING FOR COVERED SECURITIES. IF A BROKER IS NOT REQUIRED TO PROVIDE COST BASIS TO A PARTICULAR SHAREHOLDER, THE COST BASIS OF THE SHAREHOLDER'S SHARES SHOULD BE ADJUSTED AS OF THE DIVIDEND DATE TO REFLECT THE RETURN OF CAPITAL DESCRIBED ABOVE.**

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 ► \_\_\_\_\_  
Print your name ► \_\_\_\_\_ Title ► \_\_\_\_\_

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ►	Firm's EIN ►			
	Firm's address ►	Phone no.			

# AMENDED

RiverNorth Opportunities Fund, Inc.  
 SUPPLEMENTAL ATTACHMENT TO FORM 8937  
 46-4084978

**PART II, QUESTION 14:**

THE CORPORATION DECLARED THE FOLLOWING DISTRIBUTIONS TO SHAREHOLDERS IN 2023 WHERE RETURN OF CAPITAL WAS APPLICABLE:

CLASS	CUSIP NUMBER	TICKER SYMBOL	RECORD DATE	EX-DATE	PAYABLE DATE	TOTAL AMOUNT	DISTRIBUTIONS FROM NET INVESTMENT INCOME	RETURN OF CAPITAL AMOUNT
Common	76881Y109	RIV	01/13/2023	01/12/2023	01/31/2023	\$ 0.127800	\$ 0.025062	\$ 0.102738
Common	76881Y109	RIV	02/15/2023	02/14/2023	02/28/2023	\$ 0.127800	\$ 0.025062	\$ 0.102738
Common	76881Y109	RIV	03/15/2023	03/14/2023	03/31/2023	\$ 0.127800	\$ 0.025062	\$ 0.102738
Common	76881Y109	RIV	04/14/2023	04/13/2023	04/28/2023	\$ 0.127800	\$ 0.025062	\$ 0.102738
Common	76881Y109	RIV	05/15/2023	05/12/2023	05/31/2023	\$ 0.127800	\$ 0.025062	\$ 0.102738
Common	76881Y109	RIV	06/15/2023	06/14/2023	06/30/2023	\$ 0.127800	\$ 0.025062	\$ 0.102738
Common	76881Y109	RIV	07/14/2023	07/13/2023	07/31/2023	\$ 0.127800	\$ 0.025062	\$ 0.102738
Common	76881Y109	RIV	08/15/2023	08/14/2023	08/31/2023	\$ 0.127800	\$ 0.025062	\$ 0.102738
Common	76881Y109	RIV	09/15/2023	09/14/2023	09/29/2023	\$ 0.127800	\$ 0.025062	\$ 0.102738
Common	76881Y109	RIV	10/13/2023	10/12/2023	10/31/2023	\$ 0.127800	\$ 0.025062	\$ 0.102738
Common	76881Y109	RIV	11/15/2023	11/14/2023	11/30/2023	\$ 0.127800	\$ 0.025062	\$ 0.102738
Common	76881Y109	RIV	12/15/2023	12/14/2023	12/29/2023	\$ 0.127800	\$ 0.025062	\$ 0.102738
					TOTALS	\$ 1.533600	\$ 0.300744	\$ 1.232856