Form **8937**(December 2011)
Department of the Treasury

## Report of Organizational Actions Affecting Basis of Securities

See separate instructions.

OMB No. 1545-2224

Internal Revenue Service			See separate instructions.	
Part I Reporting	Issuer			
1 Issuer's name				2 Issuer's employer identification number (EIN)
RIVERNORTH EQUITY OP	PORTUNITY FUND			45-5315459
3 Name of contact for additional information 4 Telephone No. of contact				5 Email address of contact
ALPS FUND SERVICES			303-623-2577	
6 Number and street (or F	P.O. box if mail is not	delivered to s		7 City, town, or post office, state, and Zip code of contact
1290 BROADWAY, SUITE	1100			DENVER, CO 80203
8 Date of action		9 Class	sification and description	
SEPTEMBER 30, 2016		СОММО	N STOCK	
10 CUSIP number	11 Serial number	s)	12 Ticker symbol	13 Account number(s)
SEE ATTACHED			SEE ATTACHED	
				ee back of form for additional questions.
14 Describe the organiza the action ► SEE AT			e date of the action or the da	ate against which shareholders' ownership is measured for
SEE AT	TACHED STATEME	INT.		
	age of old basis ► T	HE AMOUNT	SHOWN AS A RETURN OF	rity in the hands of a U.S. taxpayer as an adjustment per F CAPITAL IN THE ATTACHED STATEMENT LLD.
16 Describe the calculativaluation dates ► <u>SEI</u>		pasis and the	data that supports the calcu	lation, such as the market values of securities and the

## Form 8937 (Rev. 12-2011) Part II **Organizational Action** (continued) 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 SECTION 316) IS INCLUDABLE IN GROSS INCOME. PURSUANT TO IRC SECTION 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 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. 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 A SIGNED COPY OF THIS FORM IS MAINTAINED AT THE OFFICES OF THE Here Signature ► TAXPAYER Print your name ▶ Print/Type preparer's name Preparer's signature PTIN Paid Check \_\_\_\_ if self-employed **Preparer** Firm's EIN ▶ Firm's name

Phone no.

Use Only

Firm's address ▶

RIVERNORTH EQUITY OPPORTUNITY FUND SUPPLEMENTAL ATTACHMENT TO FORM 8937 45-5315459

## PART I, QUESTION 10 AND 12:

	CUSIP	TICKER		
CLASS	NUMBER	SYMBOL		
Class R	76881N400	RNEOX		
Class I	76881N509	RNDIX		

## PART II, QUESTION 14:

THE CORPORATION DECLARED THE FOLLOWING DISTRIBUTION TO SHAREHOLDERS DURING THE YEAR ENDED SEPTEMBER 30, 2016 WHERE RETURN OF CAPITAL WAS APPLICABLE.

DETAIL OF THE DISTRIBUTION MADE IS DESCRIBED BELOW:

							TAXABLE	RETURN OF
	CUSIP	TICKER	RECORD		PAYABLE		DIVIDEND	CAPITAL
CLASS	NUMBER	SYMBOL	DATE	EX-DATE	DATE	AMOUNT	AMOUNT	AMOUNT
Class R	76881N400	RNEOX	3/29/2016	3/30/2016	3/31/2016	\$ 0.106600	\$ 0.081343	\$ 0.025257
Class R	76881N400	RNEOX	6/28/2016	6/29/2016	6/30/2016	\$ 0.117130	\$ 0.092452	\$ 0.024678
Class R	76881N400	RNEOX	9/28/2016	9/29/2016	9/30/2016	\$ 0.143470	\$ 0.112714	\$ 0.030756
Total Class R						\$ 0.367200	\$ 0.286509	\$ 0.080691

							TAXABLE	RETURN OF
	CUSIP	TICKER	RECORD		PAYABLE		DIVIDEND	CAPITAL
CLASS	NUMBER	SYMBOL	DATE	EX-DATE	DATE	AMOUNT	AMOUNT	AMOUNT
Class I	76881N509	RNDIX	3/29/2016	3/30/2016	3/31/2016	\$ 0.111780	\$ 0.085295	\$ 0.026485
Class I	76881N509	RNDIX	6/28/2016	6/29/2016	6/30/2016	\$ 0.122780	\$ 0.092452	\$ 0.030328
Class I	76881N509	RNDIX	9/28/2016	9/29/2016	9/30/2016	\$ 0.149260	\$ 0.112714	\$ 0.036546
Total Class I						\$ 0.383820	\$ 0.290461	\$ 0.093359