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	ssuer		·
1 Issuer's name			2 Issuer's employer identification number (EIN)
O'Shaughnessy All Cap Co			27-3050044
3 Name of contact for add	ditional information	4 Telephone No. of contact	5 Email address of contact
Kevin Hayden		414-287-3007	kevin.hayden@usbank.com
	O. box if mail is not	delivered to street address) of contact	7 City, town, or post office, state, and ZIP code of contact
615 E Michigan Street			Milwaukee, WI 53202
8 Date of action		9 Classification and description	
07/26/2019 10 CUSIP number	44 Cavial number	Nontaxable Corporate Reorganizat	
10 COSIP number	11 Serial number	s) 12 Ticker symbol	13 Account number(s)
See Attached		See Attached	
	nal Action Atta		See back of form for additional questions.
			ate against which shareholders' ownership is measured for
			O'Shaughnessy Market Leaders Value Fund (81-0785208)
		368(a) of the Internal Revenue Code.	o o madgrinessy market Educies various and (01 0700200)
in a normanable reorganiza	ition under Geotion	ood(a) of the internal Neverlae code.	
15 Describe the quantitat	ive effect of the orga	enizational action on the basis of the secu	urity in the hands of a U.S. taxpayer as an adjustment per
			ap Core Fund (merging fund) is being replaced with shares
			in the attachment for each share class. The basis of the
		_	in the attachment for each share class. The basis of the
shares received is the sair	ie as trie aggregate	basis of the shares exchanged.	
16 Describe the calculation	on of the change in I	pasis and the data that supports the calcu	ulation, such as the market values of securities and the
	_	ou held in the merging fund:	
			ent to calculate the number of shares that you now hold
in the surviving fund.	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	stay the menger rate in the attachm.	one to caround the name of one of that you now note
	ost basis by the "B	asis Ratio" in the attachment to calcula	ate the per share basis of the shares that you now hold in
the surviving fund.	,		
·		·	

Part I	Ц	Organizational Action	ı (continued)				
17 Lis	st the	applicable Internal Revenue	Code section	(s) and subsection(s) upor	n which the tax t	treatment is based	>
		nue Code Sections 354(a),					
		(-),	(),	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			
18 Ca	an any	resulting loss be recognize	d? ► No los	s can be recognized by t	he shareholder	rs of record on Ju	ly 26, 2019 for this
nontaxa	ble re	eorganization.					
Code se	ection		rger is to be o	considered a non-taxable	event. The O'S	Shaughnessy Fur	illowed under Internal Revenue ads cannot offer tax advice. We
		r penalties of perjury, I declare , it is true, correct, and complete					s, and to the best of my knowledge and
0:	Delici	, it is true, correct, and complete	c. Declaration of	proparer (other than officer) i	s based on an imo	ination of which pre	barer rias arry knowledge.
Sign		A signed copy	is maintaiı	ned by the Issuer			
Here	Signa	ture • Transfired copy		ica by the issuer		Date ►	
	Print	your name ►				Title ►	
Paid		Print/Type preparer's name		Preparer's signature		Date	Check if PTIN
Prepa	rer						self-employed
Use C		Firm's name ▶					Firm's EIN ▶
	- · · · y	Firm's address ▶					Phone no.
Send Fo	rm 89	37 (including accompanying	statements)	to: Department of the Trea	sury, Internal R	evenue Service, O	gden, UT 84201-0054

O'Shaughnessy All Cap Core Fund

Organizational Action: Merger Date of Action: 07/26/19

Attachment for Form 8937, Report of Organizational Actions Affecting Basis of Securities

Issuer's Name and EIN	Class	CUSIP	<u>Ticker</u> Symbol	NAV	Acquiring Fund	Class	CUSIP	<u>Ticker</u> Symbol	NAV	Merger Ratio	Basis Ratio
O'Shaughnessy All Cap Core Fund (27-3050044)	Α	007989130	OFAAX	10.02	O'Shaughnessy Market Leaders Value Fund	1	00770X444	OFVIX	13.78	0.727221	1.375099
O'Shaughnessy All Cap Core Fund (27-3050044)	С	007989122	OFACX	9.37	O'Shaughnessy Market Leaders Value Fund	1	00770X444	OFVIX	13.78	0.680196	1.470165
O'Shaughnessy All Cap Core Fund (27-3050044)	I	007989114	OFAIX	9.84	O'Shaughnessy Market Leaders Value Fund	1	00770X444	OFVIX	13.78	0.714006	1.400549

Statement 1