Report of Organizational Actions Affecting Basis of Securities

Part I Reporting Issuer

1. Issuer's name: The Options Clearing Corporation
2. Issuer's employer identification number (EIN): 36-2756407

3. Name of contact for additional information: Thomas Crider
4. Telephone No. of contact: 312.322.6200
5. Email address of contact: Form8937@theocc.com

6. Number and street (or P.O. box if mail is not delivered to street address) of contact: 125 S. Franklin Street Suite 1200
7. City, town, or post office, state, and ZIP code of contact: Chicago, IL 60606

8. Date of action: January 11, 2021
9. Classification and description: Options on shares of Direxion Daily Retail Bull 3X Shares

10. CUSIP number: 
11. Serial number(s): RETL
12. Ticker symbol: RETL
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: Each outstanding options contract on shares of Direxion Daily Retail Bull 3X Shares (RETL) is replaced by 5 contracts to effect a 5-for-1 share split. Effective date is January 11, 2021.

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: 20.00% of the basis in each existing contract is allocated to each of the 5 replacement contracts.

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: Tax basis in existing contracts is allocated proportionately across the replacement contracts.
Part II  Organizational Action (continued)

17  List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ►  
    Section 1012 (a)

18  Can any resulting loss be recognized? ► No.

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  ► Thomas Crider  

Date  ► 1/29/2021

Print your name  ► Thomas Crider  

Title  ► Vice President

Paid Preparer Use Only

Print/Type preparer’s name  ► Preparer’s signature  ► Date  ► Check  □ if self-employed  

Firm’s name  ►  

Firm’s address  ►  

Firm’s EIN  ►  

Phone no.  ►

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054