

US Federal Tax Treatment of the \$14 Special Dividend Announced on August 8, 2019

CIM Commercial Trust Corporation (the "Company") estimates that, for federal income tax purposes, approximately 70% of the \$14.00 per share special dividend (the "Special Dividend") on shares of CMCT Common Stock announced on August 8, 2019 will be treated as capital gain dividend for 2019, with the other 30% of the Special Dividend to be treated as a return on capital to stockholders.

The tax treatment of the Special Dividend cannot be determined with certainty until the 2019 earnings and profits are determined. As such, the estimates provided herein are based on the Company's assessment of currently available information and is subject to and will likely change.

The precise tax impact of the Special Dividend to specific stockholders depends upon the stockholder's individual tax situation. This communication is not intended to constitute tax advice. Holders of Common Stock should consult with their tax and financial advisors. The estimates contained herein represent estimated information based on current beliefs, assumptions, and/or expectations involving significant elements of subjective judgment and analysis. The Company and its affiliates make no representations about these estimates and the underlying assumptions. The Company, its affiliates and their respective partners, members, equity holders, employees, officers, directors, agents, and representatives shall have no liability in connection with the provision of these estimates.