

PACIFIC OAK STRATEGIC OPPORTUNITY REIT, INC.

SOURCE OF DISTRIBUTION STATEMENT

- A. ATTACHED IS A TRUE COPY OF REGULATION 16.9 ISSUED BY THE ATTORNEY GENERAL OF THE STATE OF NEW YORK GOVERNING THIS STATEMENT
- B. DISTRIBUTION PAID: See below.

QUARTER COVERED: See below.
- C. DESCRIPTION OF SOURCES OF DISTRIBUTION AND OTHER INFORMATION REQUIRED BY ATTACHED REGULATION:

Information with Respect to Distributions for the Quarter Ended September 30, 2019

Pacific Oak Strategic Opportunity REIT, Inc. (the “Company”) declared a distribution for stockholders of record as of the close of business on September 13, 2019, which was paid on September 18, 2019. During the quarter ended September 30, 2019, the Company paid aggregate distributions of \$0.6 million, including \$0.3 million of distributions paid in cash and \$0.3 million of distributions reinvested through the Company’s dividend reinvestment plan. The Company’s net income attributable to common stockholders for the quarter ended September 30, 2019 was \$0.8 million. The Company’s funds generated from operations, as defined by New York Regulation 16.9, during the quarter ended September 30, 2019 were \$11.3 million. Funds generated from operations are defined by New York Regulation 16.9 to be net income (loss) adjusted so that depreciation allowances are not treated as an expense and principal payments due on debt are deducted. The Company includes amortizing principal payments in the calculation of funds generated from operations but excludes principal payments required upon the sale of any underlying asset, refinancing or at loan maturity as these payments relate to and are funded by other investing and financing activities. The Company funded its aggregate distributions paid for the period with current period cash flow from operating activities.

For more information about shareholder distributions, please see the Company’s most recent quarterly report filed with the Securities and Exchange Commission on November 8, 2019.