



**GLOBAL ASSET  
MANAGEMENT**

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Please find enclosed a Passive Foreign Investment Company (“PFIC”) Annual Information Statement (“AIS”) for the requested mutual fund. The AIS contains information that will enable you, if you choose, to treat the mutual fund as a Qualified Electing Fund (“QEF”) for U.S. federal income tax purposes.

Canadian mutual funds are generally considered PFICs under U.S. tax rules. We recommend that all U.S. taxpayer clients consult with their U.S. tax advisors concerning the overall tax consequences of their ownership of mutual funds and their U.S. tax reporting requirements. You can also find information on U.S. tax rules applicable to investments in PFICs and on completing Form 8621 *“Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund”* at <http://www.irs.gov/pub/irs-pdf/i8621.pdf>.

If you hold a Class Fund (or Fund of Funds) that holds one or more underlying mutual funds, you will receive a Combined AIS containing information that will enable you to elect to treat the Class Fund (or Fund of Funds) and any or all of the underlying mutual funds as a QEF as you choose, as well as the tax information relating to the underlying mutual funds.

Please be aware that cash and property distributions reported on the AIS are converted into U.S. dollars based on the U.S. Federal Reserve spot rate in effect on the date the distribution is paid. We recommend that clients who do not file U.S. federal income tax returns on a cash basis consult their U.S. tax advisors regarding the appropriate U.S. dollar conversion rate.

Note that the information attached with this letter is intended to help you make one or more QEF elections, if you decide to do so, and neither such information nor this letter constitutes tax advice. Taxpayers should seek advice based on their particular circumstances from an independent U.S. tax advisor.

If you have any questions regarding this matter, please contact your Financial Advisor, a U.S. tax advisor, or CI Client Services at 1-800-792-9355.

Thank you for investing with us.

Sincerely,

A handwritten signature in black ink, appearing to read 'DU'.

Darie Urbanky  
President and Chief Operating Officer  
CI Investments Inc.  
March 31, 2021

**Passive Foreign Investment Company Annual Information Statement For  
the Year ended March 31, 2021**

1) This PFIC Information Statement applies to the taxable year of the below listed Fund(s) for the period below:

April 1, 2020 - March 31, 2021

2) Your prorated shares of the ordinary earnings and net capital gains for the below listed Fund(s) for the period specified in paragraph (1) are as follows:

Fund Name	Ordinary Earnings	Net Long-Term Capital Gains	Cash/Property Distributions
CI Global Infrastructure Private Pool (ETF SHARES)	0.42149	0.00000	0.00000

3) The above Fund(s) will, upon receipt of a request, permit you to inspect and copy its permanent books of account, records, and other such documents as may be maintained by the Fund(s) to establish that its (their) ordinary earnings and net capital gains are computed in accordance with U.S. income tax principles under Internal Revenue Code Section 1293 and to verify these amounts and the U.S. shareholder's pro rata share thereof.

Please note that for reporting purposes you will need to include the ordinary earnings and net capital gain for each separate entity on separate copies of Form 8621. Please consult your tax advisor.



Darie Urbanky  
President and Chief Operating Officer  
CI Investments Inc.  
March 31, 2021

THIS INFORMATION CONTAINED HEREIN IS TAKEN FROM THE AUDITED FINANCIAL STATEMENTS OF THE VARIOUS FUNDS AND IS PROVIDED IN ORDER TO ASSIST UNITHOLDERS IN MAKING CALCULATIONS AND DOES NOT CONSTITUTE TAX ADVICE. COPIES OF THE FINANCIAL STATEMENTS ARE AVAILABLE ON CI INVESTMENT'S INTERNET SITE AT WWW.CI.COM. UNITHOLDERS ARE ADVISED TO CONSULT THEIR OWN TAX ADVISORS CONCERNING THE OVERALL TAX CONSEQUENCES OF THE OWNERSHIP OF UNITS ARISING IN THEIR OWN PARTICULAR SITUATIONS UNDER UNITED STATES FEDERAL, STATE, LOCAL OR FOREIGN LAW.