

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name Ameris Bancorp		2 Issuer's employer identification number (EIN) 58-1456434	
3 Name of contact for additional information Nicole S. Stokes	4 Telephone No. of contact 229-616-6137	5 Email address of contact nicole.stokes@amerisbank.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 24 2nd Avenue SE		7 City, town, or post office, state, and Zip code of contact Moultrie, GA 31768	
8 Date of action March 11, 2016		9 Classification and description Common Stock	
10 CUSIP number 03076K108	11 Serial number(s) N/A	12 Ticker symbol ABCB	13 Account number(s) N/A

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 ▶ **Ameris Bancorp (ABCB) acquired Jacksonville Bancorp, Inc. (JAXB) by merger, in which JAXB was simultaneously merged with and into ABCB, effective March 11, 2016. Pursuant to the Agreement and Plan of Merger between ABCB and JAXB, each share of JAXB common stock and nonvoting common stock was exchanged for either 0.5861 shares of ABCB common stock or \$16.50 in cash. Former shareholders of JAXB may receive for their JAXB shares all ABCB common stock, all cash or a combination of stock and cash. The election to receive cash is subject to an aggregate cash limit to ensure that 25% of the outstanding shares of JAXB common stock and nonvoting common stock will be exchanged for cash. The election to receive stock is subject to an aggregate stock limit to ensure that 75% of the outstanding shares of JAXB common stock and nonvoting common stock will be exchanged for ABCB common stock.**

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 ▶ **See attached statement.**

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 ▶ **See attached statement.**

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ _____

IRC Section 368(a)(1)(A)

IRC Section 354

IRC Section 356

IRC Section 358

IRC Section 1221

18 Can any resulting loss be recognized? ▶ See attached statement.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year is December 31, 2016.

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 ▶

[Handwritten Signature]

Date ▶

March 21, 2016

Print your name ▶

Annis J. Zember Jr.

Title ▶

EVP & CFO

Paid Preparer Use Only

Print/Type preparer's name

Preparer's signature

Date

Check if self-employed

PTIN

Firm's name ▶

Firm's EIN ▶

Firm's address ▶

Phone no.

Attachment to Form 8937
Report of Organizational Actions Affecting Basis of Securities
Ameris Bancorp
FEIN: 58-1456434

Part II, Line 15

A shareholder's tax basis in one (1) share of ABCB common stock received in exchange for JAXB common stock should equal the shareholder's basis in one (1) share of JAXB common stock divided by 0.5861. Alternatively, a shareholder's tax basis in one (1) share of ABCB common stock received in exchange for JAXB common stock should equal 170.619348% of the shareholder's tax basis in one (1) share of JAXB common stock.

For those shareholders who received only cash consideration in the exchange, there were no ABCB shares received and, therefore, there is no basis calculation necessary.

For those JAXB shareholders who received a combination of cash and stock, the aggregate basis of ABCB shares received in the merger will be generally determined in accordance with IRC Section 358(a), as follows:

- the basis of JAXB shares exchanged;
- reduced by the cash received in the merger (if any); and
- increased by any gain recognized in the exchange, computed on a per share basis.

Part II, Line 16

The basis of ABCB shares received, once computed, must be allocated to the individual ABCB shares received in accordance with Treasury Regulation §1.358-2(a). See also Proposed Treasury Regulation §1.358-2(b). Since fewer shares of ABCB common stock were received than shares of JAXB common stock surrendered, the basis of the JAXB shares surrendered must be allocated to the shares of ABCB stock received in a manner that reflects, to the greatest extent possible, that a share of ABCB stock received is received in respect of JAXB shares of stock that were acquired on the same date and at the same price. To the extent it is not possible to allocate basis in this manner, the basis of the JAXB shares surrendered must be allocated to the shares of ABCB stock received in a manner that minimizes the disparity in the holding periods of the surrendered shares whose basis is allocated to any particular ABCB share received. This could result in a single share of ABCB stock having a split basis and a split holding period. See Example (14) of Treasury Regulation §1.358-2(c) for an illustration of this principle.

Part II, Line 18

JAXB shareholders who receive solely cash will recognize gain or loss equal to the difference between the taxable basis of the JAXB shares surrendered and the amount of cash received. The deductibility of capital losses is subject to limitation.

JAXB shareholders who receive a combination of ABCB stock and cash may generally recognize gain, but not loss, equal to the lesser of the total gain realized or the difference between the taxable basis allocable to the whole or fractional shares surrendered and the amount of cash received.

JAXB shareholders who receive only ABCB stock will generally not recognize gain or loss.