

Initial Opportunity Zones Takeaways from the IRS' Most Recent Release

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Today the IRS announced the issuance of additional guidance relating to investments in Opportunity Zones. Their 169-page release is still being digested, but some key initial takeaways include the following:



1. **Three safe-harbors** as well as **a facts and circumstances test** to provide increased clarity for compliance with the 50 percent gross income test for operating businesses.
2. **Rules** providing for a reasonable period of time for a Qualified Opportunity Fund to reinvest the return of capital into qualifying stock, partnership interest or property.
3. **Clarity** regarding how taxpayers can structure investments to comply with the requirements of the Opportunity Zone incentive.

For more information on Opportunity Zones, or to see how the new guidance impacts you or your business, please contact Bill Lorimer or Mark Underhill.

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