

Overview

The Tax Cuts and Jobs Act (TCJA) included tax incentives for investments in opportunity zones, which are census tracts comprising economically distressed communities. An opportunity zone investor may temporarily defer including eligible capital gains in their gross income for tax purposes, as long as those gains are timely reinvested in a qualified opportunity fund (QOF). Download a summary of the key terms and general requirements of the Opportunity Zone Program and a few observations on investing in QOFs.

Dentons' multidisciplinary Opportunity Zones group helps clients optimize the benefits of the federal Opportunity Zone Program. Dentons' Opportunity Zones group has extensive experience with investments and economic development incentives, as well as ongoing engagement with allied groups addressing technical and administrative issues that arise under the Opportunity Zone Program. Our lawyers team with you to explore and maximize opportunity zones-related transactions, providing measured analysis of the current program and multidisciplinary perspectives from our Corporate, Real Estate, Fund Formation, Securities, Tax and Tax-Advantaged Investing practices.

Representative Experience

- **Real estate private equity fund:** Advising on structuring opportunity zone investments in Texas, including establishing the qualified opportunity fund and preparing private placement and related fund documentation.
- **Hotel investor:** Advising on structuring opportunity zone investments for hotel developments in California and Arizona, including formation and structuring of the qualified opportunity fund and opportunity zone business venture.
- **Commercial bank lenders:** Advising various bank lenders on utilizing the Opportunity Zone Program in connection with tax credit transactions.
- **Several investors:** Providing general advice to investors on various aspects of the Opportunity Zone Program.

Your Key Contacts

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