### Thursday, November 4, 2021 8:00 AM – 9:15 AM

# Workshop 6

## Opportunity Zones: Deferring, Reducing and Eliminating Capital Gains in Real Estate Transactions

#### Steven R. Kamen, Esq.

Partner, Chair Corporate Practice Group Sills Cummis & Gross P.C. One Riverfront Plaza Newark, New Jersey 07102 skamen@sillscummis.com

## Brad A. Molotsky, Esq.

Partner, Co-Lead Opportunity Zone Practice Group
Duane Morris LLP
1949 Route 70, Suite 200
Cherry Hill, New Jersey 08003
bamolosky@duanemorris.com

- I. Introduction & Background on Opportunity Zone program creation/enactment
- II. Opportunity Zone Tax Primer
  - A. What are Qualified Opportunity Zones (QOZ)?
  - B. What is a Qualified Opportunity Fund (QOF)?
  - C. What are the Federal Tax Benefits of Opportunity Zones?
  - D. Rules for investing in a QOF and how to maximize benefits.
  - E. Rules for QOF deploying capital and relevant time periods.
  - F. Required compliance
- III. IRS Provided Relief Needed due to COVID-19-Related Delays for Taxpayers
  - A. Generally.
  - B. Postponement of 180-Day Investment Period.
  - C. 90% Investment Standard for QOFs.
  - D. Extension of 30-Month Substantial Improvement Requirement.
  - E. Extension of 31-Month Safe Harbor for Working Capital.
  - F. Extension of 12-Month Reinvestment Period.
- IV. State Tax Code Conformity Corporate Income
- V. Select Case Studies
- VI. What is Possibly Ahead Legislatively for Opportunity Zones
- VII. Conclusion