

Summary of Requirements

Investor Requirements

- Capital gain from sale to unrelated party
- Investor has 180 days to invest into a QOF
- File election with tax return

Qualified Opportunity Fund "QOF" Requirements

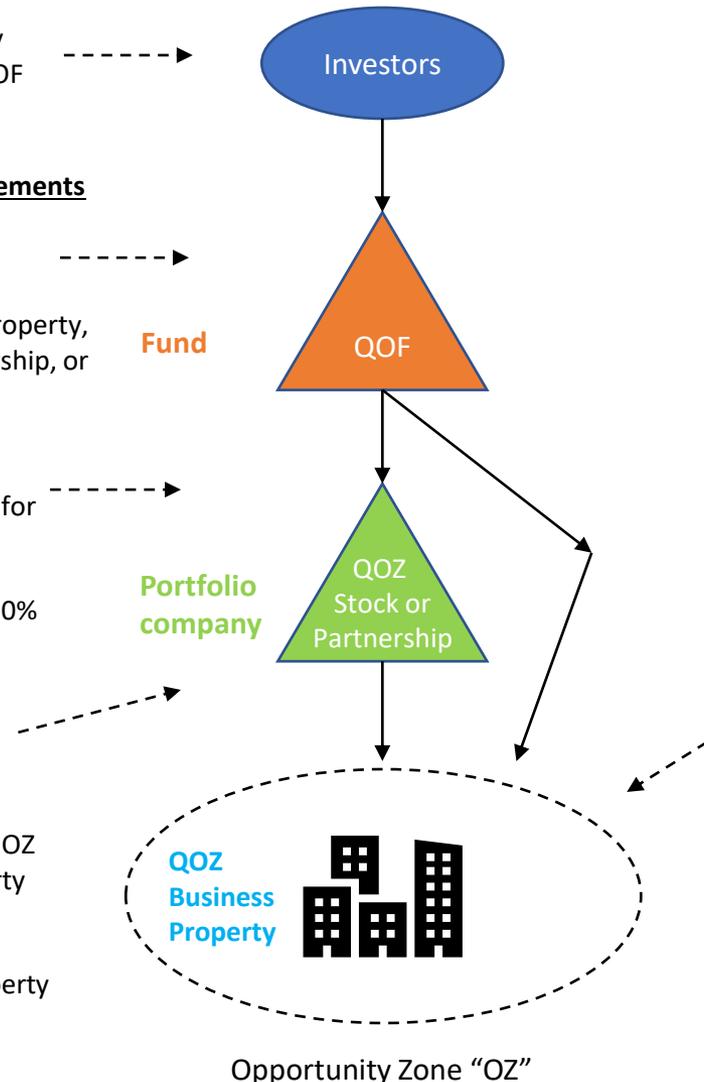
- A partnership or corporation formed for purpose of investing in QOZ Property
- Elects to be treated as a QOF
- QOF must invest 90% of assets in QOZ Property, which includes: QOZ Stock, QOZ Partnership, or QOZ Business Property

Entity Requirements

- Acquire interest in stock or partnership for cash at original issue after 12/31/17
- Must be **QOZ Business** at acquisition
- Must qualify as **QOZ Business** during >90% of QOF's holding period

QOZ Business Requirements

- A trade or business in which,
- >70% of tangible property, owned or leased, is QOZ Business Property
 - 50% of business from active conduct in OZ
 - Substantial portion of intangible property used in active business
 - Meet nonqualified financial property requirements (i.e., less than 5% of property is attributable to certain assets)
 - No sin business



QOZ Business Property Requirements

- Tangible property used in business
- Acquired after 12/31/17 by purchase from unrelated seller or by lease
- Original use or substantial improvement in OZ
- >70% use in OZ for > 90% of QOF / QOZ Business