

June 28, 2019

Office of Associate Chief Counsel (Income Tax and Accounting)
Attention: Erika C. Reigle
Internal Revenue Service
1111 Constitution Avenue, NW
Washington, DC 20224

CC:PA:LPD:PR
(REG-115420-18)
Room 5203
Internal Revenue Service
P.O. Box 7604
Ben Franklin Station
Washington, DC 20044

RE: Speaking at the Public Hearing regarding the Proposed Regulations under Section 1400Z-2--
Qualified Opportunity Zone Legislation

Dear Ms. Reigle,

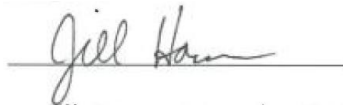
We would like to express our interest in speaking at the hearing on Opportunity Zones on July 9, 2019 regarding REG-120186-18. The following represents the points we intend to discuss for a combined total of 6 minutes. We appreciate the consideration to speak at the hearing.

- I. Treatment of Section 1231 Gains
- II. Qualification of Already-Owned Property
- III. Aggregating the Substantial Improvement Requirement
- IV. LIHTC Acquisition/Rehabilitation Qualification
- V. 10-Year Step-Up and Debt Treatment
- VI. Alternative Methods of Gain Exclusion
- VII. Triple Net Lease and Active Conduct Trade or Business
- VIII. QOF Investor Relief if Proposed Financing or Other Conditions Fail

Yours very truly,

Javelin 19 Investments, LLC

By:



Jill Homan, President

Baker Tilly Virchow Krause LLP

By:



Mallory Gorman, JD, LLM