



The Bar Association of San Francisco's Lunch and Learn series present

Unlocking Tax Benefits: 1031 Exchanges, DSTs & QOZ Strategy

SPEAKERS

Joseph Levy

Fortitude Investment Group

Anthony Calderone

Inland Securities Corporation

This program provides attorneys with a practical understanding of Internal Revenue Code Section 1031 and how it applies in real estate and estate planning practice. Attorneys regularly advise clients on property sales, trust administration, and partnership dissolutions where tax-deferral strategies under Section 1031 may be relevant.

The session clarifies how proper documentation, entity structure, and adherence to statutory timelines can help attorneys protect clients from disqualified exchanges and unintended tax exposure.

The presentation reviews the legal framework governing 1031 exchanges, including qualified use, identification, and replacement property rules, as well as the role of the Qualified Intermediary under Treasury Regulation §1.1031(k)-1. It also highlights areas of professional risk, such as constructive receipt, boot, and taxpayer identity issues, and explains how these considerations intersect with real property and estate planning practice.

Finally, the program introduces the Delaware Statutory Trust (DST) as a structure recognized under IRS Revenue Ruling 2004-86. The discussion covers how DSTs are used as replacement property within the 1031 framework and how attorneys can coordinate effectively with clients' advisors to ensure compliance. The material supports professional competence in the practice areas of real property, taxation, and estate planning.

TOPICS

- How does a 1031 Exchange work for full deferral?
- What taxes might a taxpayer owe?
- Who is a Qualified Intermediary and why are they necessary?
- What is a Delaware Statutory Trust (DST) and who qualifies?
- What qualifies as a Qualified Opportunity Zone Fund investment?
- What is a Qualified Opportunity Zone?
- What are the tax advantages of a QOF?



Thursday, March 5, 2026

Virtual Program
12:00 - 1:15 p.m.

No MCLE will be provided.



Location

Virtual
Zoom link will be provided before event.



Pre-registration is required

Cost
FREE BASF Members
\$50 Non-members

Register online: www.sfbar.org/calendar

Event Code: G261617

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