

Final Allocation & Accounting Regulations under Section 141

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This issue of the Hawkins Advisory describes the Treasury Regulations promulgated under section 141 of the Internal Revenue Code of 1986, allocating the proceeds of tax-advantaged bonds to assets or portions of assets and accounting for the use of such assets or portions thereof.

On October 27, 2015, the final allocation and accounting regulations were published in the Federal Register. These final regulations address situations in which facilities financed with the proceeds of tax-advantaged bonds* are used in both “qualified” and “unqualified” uses, as such terms are described below.

Practice

- Tax