CANTOR Fitzgerald

investing in the ZONE

Discover a tax-advantaged investment strategy through Opportunity Zones.

DISCLAIMER

The information contained herein is for informational purposes only and is not an offer or a solicitation related to the sale of any securities. Such an offer or solicitation can be made only through an Offering Memorandum, which is always the controlling document and supersedes the information contained herein. The analysis contained herein does not constitute an investment recommendation or take into account the particular investment objectives, investment strategies, financial situation and needs of any specific recipient. We recommend that you obtain financial and/or tax advice as to the implications of investing in the manner described or in any of the products mentioned herein. Certain services and products are subject to legal restrictions and cannot be offered worldwide on an unrestricted basis and/or may not be eligible for sale to all investors. All information and opinions expressed in this document were obtained from sources believed to be reliable and in good faith, but no representation or warranty, express or implied, is made as to its accuracy or completeness. All information and opinions as well as any prices indicated are current only as of the date of this report, and are subject to change without notice. Opinions expressed herein may differ or be contrary to those expressed by other business areas or divisions of Cantor Fitzgerald, L.P. ("Cantor Fitzgerald") or its affiliates as a result of using different assumptions and/or criteria. The contents of this document have not been and will not be approved by any securities or investment authority in the United States or elsewhere. Cantor Fitzgerald and its affiliates disclaim any and all liability for any loss that may arise from use of the information contained herein.

References herein to past returns of any fund, investment product or market sector are not an indication of future performance.

Cantor Fitzgerald and its affiliates specifically prohibit the redistribution or reproduction of this material in whole or in part without the prior written permission of Cantor Fitzgerald. Cantor Fitzgerald accepts no liability whatsoever for the actions of third parties in this respect.

Cantor Fitzgerald and its affiliates do not provide tax, legal, or accounting advice. This material and any accompanying communications have been prepared for informational purposes only, and do not constitute, are not intended to provide and should not be relied on as an investment recommendation or tax, legal, accounting, financial or other advice by Cantor Fitzgerald or its affiliates. You should consult your own tax, legal, and accounting, financial or other professionals before engaging in any transaction.

Current publication date: 2.4.20

RISK FACTORS

- The Qualified Opportunity Zone rules are new and the U.S. Department of Treasury and the Internal Revenue Service have issued regulations (together with the Qualified Opportunity Zone rules, the "QOZ Program"), but many questions remain unanswered and changes to the QOZ Program could potentially reverse the tax benefits provided thereunder (the "QOZ Tax Benefits").
- Investors in Qualified Opportunity Funds will need to hold their investments for certain time periods in order to receive the full QOZ Tax Benefits afforded by the QOZ Program. A failure to do so may result in the potential tax benefits to the investor being reduced or eliminated.
- If a fund fails to meet any of the qualification requirements to be considered a Qualified Opportunity Funds, the anticipated QOZ Tax Benefits may be reduced or eliminated. Furthermore, a fund may fail to qualify as a Qualified Opportunity Funds for non-tax reasons beyond its control, such as financing issues, zoning issues, disputes with co-investors, etc.
- Distributions to investors in a Qualified Opportunity Funds may result in a taxable gain to such investors.
- The tax treatment of distributions to holders of interests in a Qualified Opportunity Fund are uncertain, including whether distributions impact the aforementioned QOZ Program tax benefits.
- A Qualified Opportunity Fund must make investments in Qualified Opportunity Zones, which carries the inherent risk associated with investing in economically depressed areas.
- Any additional legislation or administrative guidance may reduce or eliminate the expected potential QOZ Tax Benefits or increase the burden of compliance with the QOZ Program.
- Investors in a Qualified Opportunity Fund may not be able to take advantage of the QOZ Program’s tax benefits if they do not properly make a deferral election on IRS Form 8949.
- Qualified Opportunity Funds may encounter significant opposition from local communities, political groups or unions, which may damage their goodwill and reputation and adversely affect operations.
- An investment in a Qualified Opportunity Fund is speculative, illiquid and involve a high degree of risk. This is no guarantee that investors will receive any return.

AGENDA

1. WORKING WITH CANTOR FITZGERALD
2. OVERVIEW OF THE QUALIFIED OPPORTUNITY ZONE PROGRAM
3. TAX CONSIDERATIONS AND TIMELINE
4. QUALIFIED OPPORTUNITY FUND REQUIREMENTS
5. 1031 EXCHANGES, DSTs AND QUALIFIED OPPORTUNITY ZONES

WORKING WITH

CANTOR FITZGERALD

INTRODUCTION TO CANTOR FITZGERALD

SINCE 1945, CANTOR FITZGERALD & CO. HAS BUILT A STRONG REPUTATION AS A SOURCE OF KNOWLEDGE IN THE GLOBAL INVESTMENT MARKETPLACE.

FOUNDED IN 1945

A global financial services firm with significant real estate, capital markets, research and investment expertise

12,500+ EMPLOYEES

More than 12,500 employees worldwide

150 OFFICES WORLDWIDE

Cantor Fitzgerald maintains more than 150 offices in 22 countries

INVESTMENT GRADE

Maintains an investment-grade credit rating by Standard & Poor's and Fitch

1 OF 24 PRIMARY DEALERS

One of 24 primary dealers of U.S. government securities

CANTOR FITZGERALD – REAL ESTATE CAPABILITIES

MORE THAN $67 BILLION
IN REAL ESTATE-RELATED TRANSACTIONS IN 2018

- Investment sales
- Leasing
- Valuation
- Property management
- Capital raising
- Investment Management

- Debt placement
- Consulting
- Facilities management
- Tenant representation
- More than 200 corporate clients

INVESTMENT INNOVATION
FINANCING & BROKERAGE
CORPORATE ADVISORY
CAPITAL MARKETS

- Fixed and floating rate commercial real estate loans
- Stable and transitional properties
- Securitizations

- Multifamily agency lending
- Fannie Mae, Freddie Mac and FHA/Ginnie Mae
- $60 billion servicing portfolio; 3,400 loans; 49 states and D.C.

Cantor Fitzgerald refers to Cantor Fitzgerald, L.P., its subsidiaries, including Cantor Fitzgerald & Co., and its affiliates including BGC Partners (NASDAQ: BGCP) and Newmark Knight Frank (NASDAQ:NMRK).

UNCOVERING OPPORTUNITY WITH A GLOBAL REAL ESTATE PRESENCE

SIGNIFICANT GLOBAL REACH WITH MORE THAN 150* OFFICES SPANNING SIX CONTINENTS

- Global real estate platform
- Local market expertise and operational capabilities
- Direct tenant and owner relationships allow for greater investment selectivity
- Access to institutional-quality real estate transactions
- Real-time insight into global real estate and capital markets

*Includes London-based partner Newmark Knight Frank and independently-owned offices.

OVERVIEW OF THE

QUALIFIED OPPORTUNITY ZONE PROGRAM

WHAT

A unique initiative that preserves capital gains and delivers potential tax benefits to investors.

WHEN

Created by the Tax Cuts and Jobs Act of 2017.

WHERE

8762 Qualified Opportunity Zones located across the U.S.

WHY

Encourages long-term investments in designated communities known as Qualified Opportunity Zones.

HOW

Individuals or entities that invest their capital gains in these communities through investment vehicles called Qualified Opportunity Funds may receive multiple tax benefits.

A TAX ADVANTAGED PROGRAM FOCUSED ON COMMUNITY INVESTING

WHAT IS A QUALIFIED OPPORTUNITY ZONE (“QOZ”)?

A designated census tract in the United States that has been selected by a state governor and certified by the U.S. Department of Treasury for inclusion in the QOZ Program. **There are over 8,700 Qualified Opportunity Zones.**[1]

WHAT IS A QUALIFIED OPPORTUNITY ZONE FUND (“QOF”)?

An investment vehicle organized as either **a partnership or corporation that holds at least 90% of its assets in QOZ property (the “90% Asset Test”).** QOFs can make investments in a wide variety of real estate or new or existing businesses, including commercial real estate, housing, infrastructure and start-up businesses. QOFs can hold single or multiple assets. QOZ property includes interests held by the QOF in a QOZB (as defined below).

WHAT ARE QUALIFIED OPPORTUNITY ZONE BUSINESSES (“QOZB”)?

A business in which at least 70% of tangible assets qualify as QOZ business property owned or located in a QOZ. At least 50% of the gross income earned by the business must be from the active conduct of the business in the QOZ and it is not a “Sin Business.” No more than 5% of the assets of the QOZB can be “non-qualified financial property.”

[1] Economic Innovation Group, 2018

DEMAND FOR QOFS

Opportunity Zone investments are ***created to help drive real estate development, job creation and overall economic growth,*** *which can then have a compounding effect on the original investment, potentially benefiting investors and communities alike*.

"Opportunity Zones are **domestic emerging markets**"

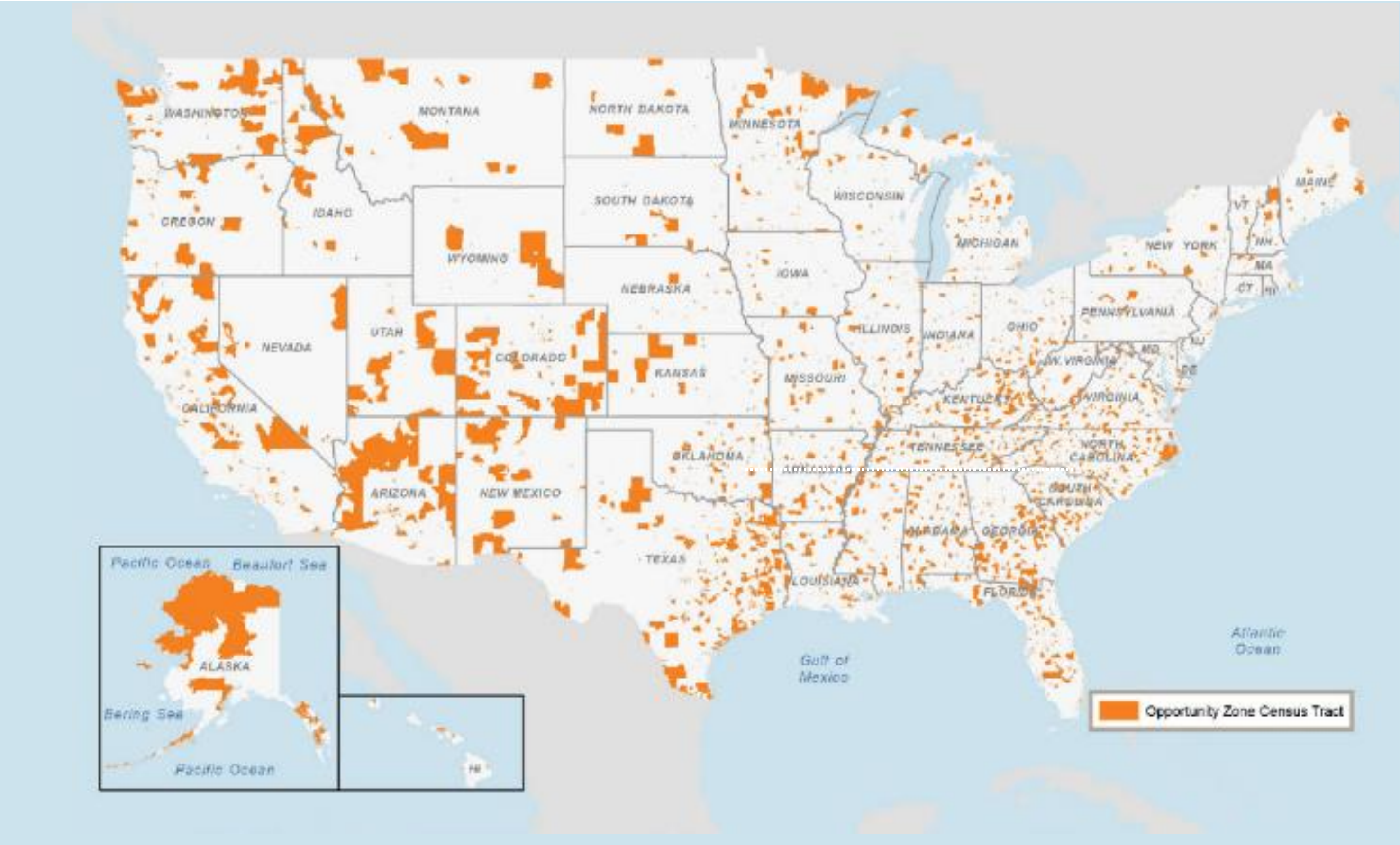
Sen. Cory Booker
(D) New Jersey (Forbes, 7/17/18).

With U.S. taxpayers holding more than ***$6 trillion in unrealized capital gains***[1]*, Qualified Opportunity Funds may offer a compelling option for deferring, reducing and potentially eliminating capital gains taxes.*

[1]Economic Innovation Group, 2018.

CANTOR Fitzgerald

UNITED STATES OPPORTUNITY ZONE MAP



$6 TRILLION[1]

Estimated unrealized capital gains from both American households and corporations

1 MILLION [2]

Properties across all property types nationwide are believed to be located within QOZs

$52,694[3]

Average household income in QOZs

18.2%

Total Land Area[3] in the U.S. that is represented by QOZs; comprises 5.4% of major metro land area

This map was produced using private and government sources.
This information is provided without representation or warranty. Source: ESRI.

[1]*Economic Innovation Group, 2018*
[2]*CoStar, 2019*
[3]*ESRI, 2018*

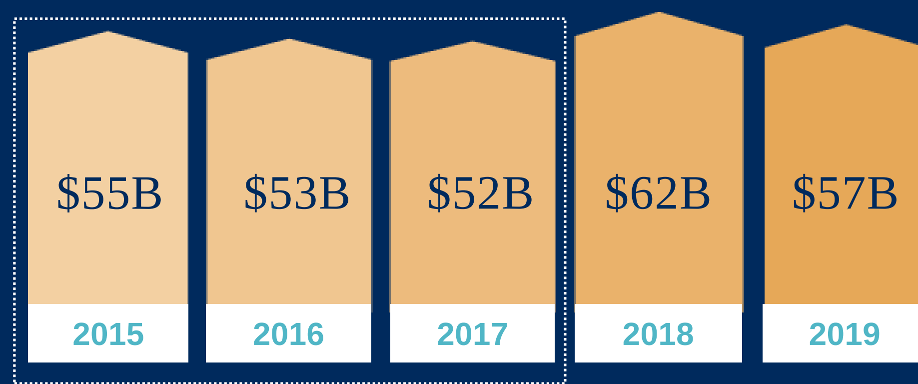
CANTOR Fitzgerald

INSTITUTIONAL CAPITAL INVESTED BEFORE LEGISLATION WAS ENACTED

$279 BILLION

Total investments in markets now deemed Qualified Opportunity Zones. Even before the current legislation was enacted, these areas attracted significant institutional capital.

U.S. TOTAL OPPORTUNITY ZONE REAL ESTATE SALES[1]



[1]Newmark Knight Frank Research, Real Capital Analytics (inclusive of activity in areas prior to designation).

INTENDED IMPACT OF THE QOZ PROGRAM

INCREASE IN JOB AVAILABILITY

INCREASE IN MEDIAN INCOME

REDUCTION IN POVERTY RATE

INCREASE IN NUMBER OF AFFORDABLE HOUSING UNITS

INCREASE IN HOME OWNERSHIP

REDUCTION IN UNEMPLOYMENT

“To create a **brighter tomorrow for communities** that have been left behind, we need to capitalize on the private sector resources that can help boost these areas in ways we haven’t seen before”

Sen. Tim Scott
(R) South Carolina
(USA Today, 2/14/18)

CANTOR Fitzgerald

TAX CONSIDERATIONS
AND TIMELINE

A TRIO OF POTENTIAL TAX BENEFITS

The most immediate QOZ Tax Benefit is the ability to defer the recognition of capital gains invested in a Qualified Opportunity Fund as taxable income until the Qualified Opportunity Fund investment is sold or December 31, 2026, whichever occurs first. There is no limit on the amount of gains that can be deferred in this manner.

Capital gains taxes may be reduced through a step-up in basis. Investors who hold their Qualified Opportunity Fund investment receive a 10% step-up[1] in basis for investments made before December 31, 2021 and held until 2026.

[1] An additional 5% step-up in basis is available for investments made prior to December 31, 2019.

Investors who hold their investment for at least ten years pay no tax on the appreciation of their Qualified Opportunity Fund investment upon disposition of such Qualified Opportunity Fund investment, regardless of the size of the potential profit.

[2] Assumes that the investor is a resident of a state that conforms with the QOZ Program.

UNDERSTANDING ELIGIBILITY

WHAT IS AN “ELIGIBLE” GAIN?

Gain is eligible for deferral if it is from the sale or exchange of property with an unrelated party (not more than 20 percent common ownership) and the gain is treated as a capital gain (short-term and long term) for federal income tax purposes, including gains from:

- Stocks, bonds, options, hedge funds
- Primary and secondary residences
- Businesses, machinery, commercial buildings
- Land, livestock, art, wine, automobiles

See Prop. Treas. Reg. §1.1400Z-2(a)-1(b)(2)(iii).

WHAT IS AN “ELIGIBLE” TAXPAYER?

The proposed regulations provide that taxpayers eligible to elect gain deferral include:

- Individuals
- C Corporations (Including regulated investment companies (RICs) and real estate investment trusts (REITs)
- Partnerships, and
- Certain other pass-through entities

The first day of the 180-day period to reinvest gains into a QOF generally is the date on which the gain would be recognized for federal income tax purposes

See Prop. Treas. Reg. §1.1400Z-2(a)-1(b)(1).

A TEN-YEAR TIMELINE

A 10-YEAR TIMELINE

DEMONSTRATES HOW THE QOZ PROGRAM WORKS

YEAR 1

2020
Invest capital gains from prior investment into a Qualified Opportunity Fund and begin deferring tax

YEAR 5

2025
Tax basis increased from $0 to 10% of the invested capital gains, reducing future tax liability

YEAR 7

2027
Pay taxes on original capital gain (reduced by the 10% step up in basis)

YEAR 10+

2030 – 2047
Pay no federal capital gains taxes on the appreciation of the Qualified Opportunity Fund investment once sold

POTENTIAL TAX ADVANTAGES OF INVESTING IN A QUALIFIED OPPORTUNITY FUND

SCENARIO: HYPOTHETICAL AFTER-TAX VALUE[1,4]

$1,000,000 INVESTMENT OVER 10-YEAR HOLD
(assuming hypothetical 7% compounded rate of return on both investments)

Investors may pay as little as $0 in capital gains on the next decade of investment returns.

	Non-Qualified Opportunity Fund	*Qualified Opportunity Fund*[2]
ORIGINAL CAPITAL GAIN *from sale of prior investment*	$1,000,000	$1,000,000
TAX RATE	30%	30%
− **TAX ON ORIGINAL CAPITAL GAIN**	($300,000)	Deferred
= **INVESTABLE AMOUNT** *after tax*	$700,000	$1,000,000
X **COMPOUNDED HYPOTHETICAL ANNUAL RETURN**	7%	7%
= **APPRECIATION** *over 10 years*	$677,006	$967,151
− **TAX ON APPRECIATION** *after 10 years*	($203,102)	$0
− **LONG TERM CAPITAL GAINS TAXES PAID[3] IN 2027** *on original capital gain*	$0	($270,000) *30% of $900k, basis stepped up 10%*
= **FINAL VALUE** *After 10 years, net of taxes paid*	**$1,173,904**	**$1,697,151**

[1] This illustration assumes the investor is subject to the top marginal U.S. federal income tax rate of 20% on long term capital gains for individuals, the net investment income tax of 3.8% and a state tax of 6.2% for a total tax liability of 30%. No brokerage or investment advisory fees are accounted for with respect to the Non-Qualified Opportunity Fund example above and no distributions made on the Class C common stock, no fees due to our Manager and its affiliates and no sales commissions, deal manager fees and non-accountable diligence and marketing allowances due to our Managing Broker-Dealer and its affiliates are accounted for with respect to the Qualified Opportunity Fund example.

[2] This illustration assumes that the Qualified Opportunity Zone investor is a resident of a state that conforms with the QOZ Program.

[3] Assumes that the investor has no capital losses to reduce such capital gain and refers to the inclusion of the original, invested capital gains in such investor's taxable income on December 31, 2026.

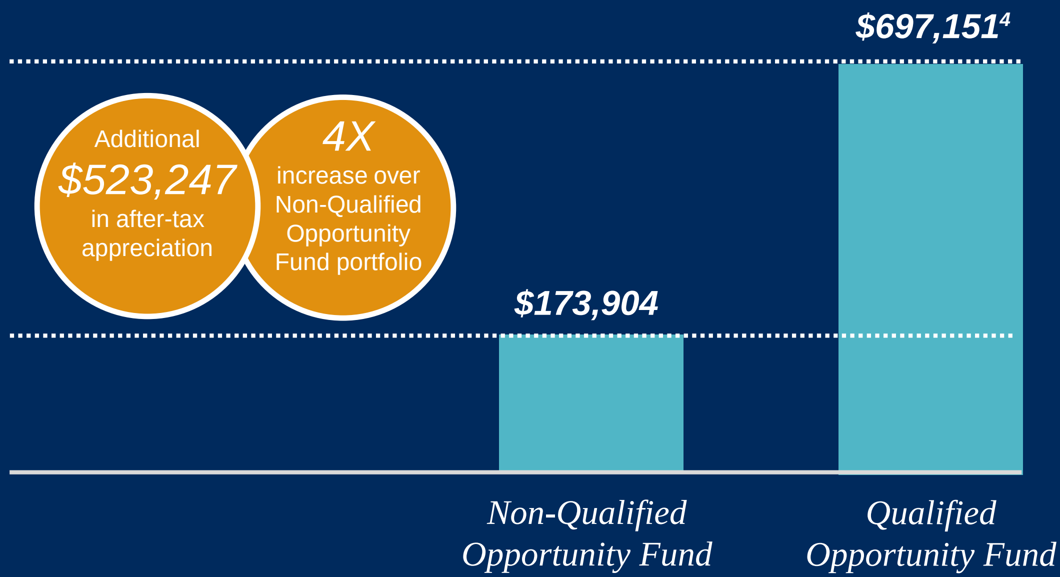
[4] This example assumes the investor does not pass away during the ten-year period. If the investor were to pass away, the heirs receive a step-up in basis in the Non-Qualified Opportunity Fund example and a carryover basis for the Qualified Opportunity Fund example.

CANTOR Fitzgerald

QUANTIFYING THE TAX BENEFITS

SCENARIO: HYPOTHETICAL AFTER-TAX GROWTH[1,5]

$1,000,000 INVESTMENT OVER 10-YEAR HOLD
(assuming hypothetical 7%[2,3] compounded rate of return in both investments)



[1] This illustration assumes the investor is subject to the top marginal U.S. federal income tax rate of 20% on long term capital gains for individuals, the net investment income tax of 3.8% and a state tax of 6.2% for a total tax liability of 30%. No brokerage or investment advisory fees are accounted for with respect to the Non-Qualified Opportunity Fund example above and no distributions made on the Class C common stock, no fees due to our Manager and its affiliates and no sales commissions, deal manager fees and non-accountable diligence and marketing allowances due to our Managing Broker-Dealer and its affiliates are accounted for with respect to the Qualified Opportunity Fund example.

[2] Assuming an 8% compounded rate of return for both investments, the Non-Qualified Opportunity Fund investment would have $267,873 in after-tax gains above $1M and the Qualified Opportunity Fund investment would have $888,925, an additional $621,052.

[3] Assuming a 9% compounded rate of return for both investments, the Non-Qualified Opportunity Fund investment would have $370,008 in after-tax gains above $1M and the Qualified Opportunity Fund investment would have $1,097,364, an additional $727,355.

[4] This illustration assumes that the Qualified Opportunity Zone investor is a resident of a state that conforms with the federal QOZ Program.

[5] This example assumes the investor does not pass away during the ten-year period. If the investor were to pass away, the heirs receive a step-up in basis in the Non-Qualified Opportunity Fund example and a carryover basis for the Qualified Opportunity Fund example.

QUALIFIED OPPORTUNITY FUND

REQUIREMENTS

REAL ESTATE REQUIREMENTS

To qualify as QOZ business property, the real estate must have been acquired after **December 31, 2017**, and meet one of the following requirements:

The QOF (or QOZB) **substantially improves** the property.

During a 30-month period after the acquisition date, the improvements to an existing building in a QOZ must double the basis in order to meet the substantial improvement test. Land is excluded from the adjusted basis calculation.

Example: *Property is purchased for $1.5 million; $0.5 million of that purchase is attributable to land; more than $1.0 million in capital is required to substantially improve property.*

Original use of the property within the QOZ must begin with the QOF (or QOZB).

QUALIFIED OPPORTUNITY FUND REQUIREMENTS

INVESTMENT VEHICLE	QOFs are the required investment vehicle for investors to take advantage of the QOZ tax benefits and QOF can self-certify its qualification as a QOF without additional action by the Internal Revenue Service (the "IRS").
ORGANIZING	Must be organized as a corporation or partnership for the purpose of investing in QOZ property. LLCs can be organized as a QOF as long as they choose to be treated as a partnership or corporation for tax purposes.
180 DAYS	Investors have 180 days to invest their capital gains into a QOF.
TRACING REQUIREMENT	There is no tracing requirement on the capital gain before it is invested in a QOF. Reinvestment does not need to be made via the same proceeds received in the transaction triggering the capital gain.
HOLDING OF ASSETS	A QOF must hold at least 90% of its assets in QOZ property. A QOZB must hold at least 63% of its assets in QOZ business property (applying the 70-30 rule to the original 90-10 requirement).
LOANS	Loans are not eligible for QOZ tax benefits.
CARVEOUTS	There are carveouts for non-qualified or "sin businesses," i.e., casinos, golf courses, racetracks, etc., and for financial companies that invest and lend as their core business.
CASH	Investors may invest non-capital gain funds into a QOF, but will not be able to receive any of the QOZ tax benefits.

EVALUATING THE RISKS

Certain QOZ areas may not be able to appreciate as predictably as more established areas.

Some neighborhoods may be more accommodating to development than others, impacting the success of the investment.

Development and redevelopment of real estate traditionally have more risk than other types of real estate strategies.

The availability and cost of construction and development financing is uncertain and represents a risk inherent in the execution of a QOF strategy.

The rules and regulations of the QOZ Program are complex, compliance with the QOZ Program comes with significant challenges.

The QOZ Program is still being finalized by the IRS, with uncertainties regarding many of its provisions.

PROPOSED REGULATION SELF-CERTIFICATION AND GAIN DEFERRAL ELECTION FORMS

FORM 8996 FOR SELF-CERTIFICATION AND ANNUAL COMPLIANCE

QOFs will use Form 8996, Qualified Opportunity Fund, both for initial self-certification and for annual reporting of compliance with the 90% Asset Test and attach the form to the QOF's federal income tax return for the relevant tax years. See Prop. Treas. Reg. §1.1400Z-2(d)-1(a)(1)(i).

FORM 8949 FOR GAIN DEFERRAL ELECTION

Taxpayers will make gain deferral elections on Form 8949, which will be attached to their federal income tax returns for the taxable year in which the gain would have been recognized if it had not been deferred.

EFFECTIVE DATES

The proposed regulations generally are proposed to be effective on or after the date of publication in the Federal Register. However, eligible taxpayers may generally rely on the proposed rules prior to the final regulations if the taxpayer applies the rules in their entirety and in a consistent manner.

PROPOSED REGULATION SELF-CERTIFICATION AND GAIN DEFERRAL ELECTION FORMS

Form **8949**

Department of the Treasury
Internal Revenue Service

Sales and Other Dispositions of Capital Assets

▶ Go to *www.irs.gov/Form8949* for instructions and the latest information.

▶ File with your Schedule D to list your transactions for lines 1b, 2, 3, 8b, 9, and 10 of Schedule D.

OMB No. 1545-0074

2018

Attachment Sequence No. **12A**

Name(s) shown on return | **Social security number or taxpayer identification number**

Before you check Box A, B, or C below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B. Either will show whether your basis (usually your cost) was reported to the IRS by your broker and may even tell you which box to check.

Part I **Short-Term.** Transactions involving capital assets you held 1 year or less are generally short-term (see instructions). For long-term transactions, see page 2.

Note: You may aggregate all short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the totals directly on Schedule D, line 1a; you aren't required to report these transactions on Form 8949 (see instructions).

You *must* check Box A, B, *or* C below. Check only one box. If more than one box applies for your short-term transactions, complete a separate Form 8949, page 1, for each applicable box. If you have more short-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need.

☐ **(A)** Short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see **Note** above)
☐ **(B)** Short-term transactions reported on Form(s) 1099-B showing basis **wasn't** reported to the IRS
☐ **(C)** Short-term transactions not reported to you on Form 1099-B

1 (a) Description of property (Example: 100 sh. XYZ Co.)	(b) Date acquired (Mo., day, yr.)	(c) Date sold or disposed of (Mo., day, yr.)	(d) Proceeds (sales price) (see instructions)	(e) Cost or other basis. See the **Note** below and see *Column (e)* in the separate instructions	**Adjustment, if any, to gain or loss.** If you enter an amount in column (g), enter a code in column (f). **See the separate instructions.**		(h) **Gain or (loss).** Subtract column (e) from column (d) and combine the result with column (g)
					(f) Code(s) from instructions	(g) Amount of adjustment	

1031 EXCHANGES, DSTs AND

QUALIFIED OPPORTUNITY ZONES

IRC SECTION 1031

IRC SECTION 1031 STATES

*“**No gain or loss shall be recognized** on the exchange of real property held for productive use in a trade or business or for investment **if such real property is exchanged solely for real property of*** **LIKE-KIND*** *which is to be held either for productive use in a trade or business or for investment.”*

*Like-kind is a property similar in nature or character, regardless of differences in grade, property type, or quality.

1031 EXCHANGE RULES

PURCHASE VALUE	$\geq$	SOLD VALUE
INVESTED EQUITY	$\geq$	EQUITY AMOUNT FROM SALE
DEBT ON REPLACEMENT PROPERTY	$\geq$	DEBT ON RELINQUISHED PROPERTY

1031 EXCHANGE TIMELINE

Day 1

Sale of relinquished property

Identification period starts

Day 45

Identification period ends

Day 180

Last day to purchase replacement property

WHAT IS A DST?

DELAWARE STATUTORY TRUST (“DST”)

A business trust that can be used for real estate ownership of higher-quality, professionally managed commercial properties; provides a passive, turn-key solution for transacting a 1031 exchange.

- Investors in a DST are not direct owners of the real estate, but instead own an undivided interest in the assets held by the trust.
- The Trust holds title to the property for the benefit of many investors.
- DSTs are recognized by the IRS (Rule 2004-86) as qualified replacement property for real property.

There is no guarantee of success. Investors could incur a loss of all or a portion of their investment.

HOLDINGS OF IRS REVENUE RULING 2004-86

“**(1)** The Delaware Statutory Trust is an investment trust, under § 301.7701-4(c), that will be classified as a trust for federal tax purposes.

(2) A taxpayer may exchange real property for an interest in the Delaware Statutory Trust without recognition of gain or loss under Section 1031, if the other requirements of Section 1031 are satisfied.”

A COMPARISON OF QOFS AND 1031 EXCHANGES

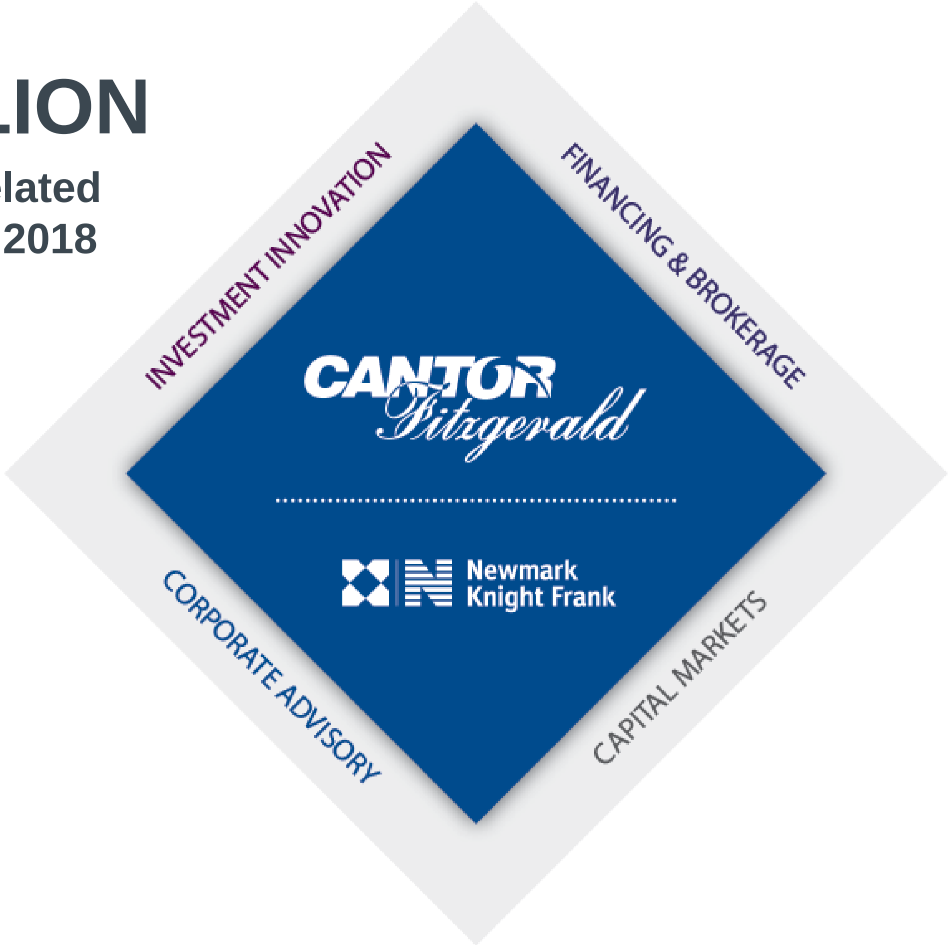
1031 Exchange	*Category*	Qualified Opportunity Fund
Real estate held for investment purposes.	**ELIGIBLE ASSETS***	Any investment including stocks, bonds, real estate, collectables, partnership interests, etc.
Principal and capital gains of the real estate sale.	**ROLLOVER PARAMETERS**	Capital gains only (principal not required).
Real property without location restrictions.	**ELIGIBLE INVESTMENTS**	Generally includes commercial real estate, housing, infrastructure and businesses within an OZ.
Must identify a replacement property within 45 days and close within 180 days.	**REPLACEMENT PROPERTY**	No identification requirement. The gain must be invested in a QOF within 180 days.
May be deferred indefinitely with a step-up in basis upon death.	**CAPITAL GAINS TAX**	The original gain may be deferred and reduced, but the remainder of such original gain must be included in income on December 31, 2026. Any new gain may be eliminated.
Maximize after-tax return through income and appreciation.	**INVESTMENT GOALS**	Maximize after-tax return through income and appreciation.

*Gains recognized from the disposition of the following assets are eligible to receive the respective tax benefits of the 1031 exchanges and investments in QOFs.

CANTOR FITZGERALD - $67 BILLION IN REAL-ESTATE RELATED TRANSACTIONS IN 2018

$67 BILLION

in real estate-related transactions in 2018



CANTOR Fitzgerald®

RIA AND BROKER DEALER INQUIRIES:

Cantor Fitzgerald & Co.
110 E. 59th St.
New York, NY 10022
1-855-9-CANTOR (22-6867)
cfsupport@cantor.com
cantor.com

ALL OTHER INQUIRIES

Opportunity Zones
110 E. 59th St.
New York, NY 10022
1-855-9-CANTOR (22-6867)
cfsupport@cantor.com