



IRS Green-Lights Pre-Revenue Spinoff

PRACTICE AREAS

Tax

Helna Klumpp

IPB Tax Insider

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A private letter ruling made public last week signaled the IRS's increasing willingness to approve spinoffs involving early-stage ventures. The ruling is especially significant to industries like pharmaceuticals and biotechnology, where products come to market through research, development, and regulatory-approval pipelines that can extend for many (unprofitable) years.