



Tax-Free Exchange Treatment for Exchanges of Intangible Property

PRACTICE AREAS

Tax

November 30, 2009

In recent guidance, the Internal Revenue service appears to have changed its position on the eligibility of exchanges of certain types of intangible property for non-recognition treatment under Code section 1031. We believe this creates potential opportunities not only for structuring future exchange transactions, but also for obtaining tax-free treatment for past exchanges through an accounting method change.

For more information on this planning opportunity, [click here](#).