Bond Case Briefs

Municipal Finance Law Since 1971

IRS PLR: Management Contract Will Not Result in Private Business Use.

The IRS ruled that a management contract between a bond issuer — which issued bonds for permanent financing of a hotel — and the manager of the hotel for payment of the manager of annual fees composed of both base fees and incentive fees based on gross revenue will not result in private business use of the hotel.

Read the Private Letter Ruling.

Copyright © 2026 Bond Case Briefs | bondcasebriefs.com