



## Ohio Revised Code

### Section 5747.86 Opportunity zone investment tax credit.

Effective: September 30, 2025

Legislation: House Bill 96

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Terms used in this section have the same meanings as in section 122.84 of the Revised Code.

There is hereby allowed a nonrefundable credit against a taxpayer's aggregate tax liability under section 5747.02 of the Revised Code for a taxpayer who is issued, or to whom is transferred, a tax credit certificate under section 122.84 of the Revised Code. The credit equals the amount stated on the certificate and may be claimed for the taxable year that includes the first day of the investment period that was the subject of the application for the certificate under that section or for the ensuing taxable year. For a credit issued during the July application round each year, the credit may also be claimed for the preceding taxable year. A taxpayer applying a credit for the preceding taxable year shall file an amended return or apply that amendment on the taxpayer's original return, for that year.

If the certificate is held by a pass-through entity, any taxpayer that is a direct or indirect investor in the pass-through entity on the last day of the entity's qualifying taxable year may claim the taxpayer's proportionate or distributive share of the credit against the taxpayer's aggregate amount of tax levied under section 5747.02 of the Revised Code.

The credit shall be claimed in the order required under section 5747.98 of the Revised Code. If the credit exceeds the taxpayer's aggregate tax due under section 5747.02 of the Revised Code for that taxable year after allowing for credits that precede the credit under this section in that order, such excess shall be allowed as a credit in each of the ensuing five taxable years, but the amount of any excess credit allowed in any such taxable year shall be deducted from the balance carried forward to the ensuing taxable year.

No credit shall be claimed under this section to the extent the credit was claimed under section 5725.38, 5726.61, or 5729.21 of the Revised Code.

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