SURVIVAL 401k · STRATEGIC ADVISORY

The Autonomous Investor Solo 401(k) Blueprint

Non-Recourse Leverage, Real Estate Control, and the UDFI Edge

A deep-dive structural blueprint for real estate agents, brokers, flippers, landlords, and syndicators who want their retirement plan to hold the deed.

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01 · EXECUTIVE SUMMARY

Why the Solo 401(k) Wins for Real Estate

For a real estate professional, the retirement account is usually an afterthought: a brokerage IRA holding mutual funds, far removed from the deals that actually build the business. The Solo 401(k) changes the relationship. It is a qualified retirement plan for an owner-only business, and when it is properly adopted and maintained it can hold investment real estate, private notes, and syndication interests directly, fund them with the largest contribution limits in the retirement world, and, critically, **generally avoid the tax that traps a self-directed IRA on debt-financed property**.

$72K	$83.25K	§514(c)(9)
2026 Solo 401(k) combined annual additions limit[1,2]	Cap if you are age 60 to 63 in 2026 with the super catch-up[1,2]	Solo 401(k) carve-out that can shelter debt-financed real estate[5,6]

The one-sentence thesis.

A Solo 401(k) lets a self-employed real estate operator shelter up to **$72,000** of earned income in 2026 (more with catch-up contributions),[1,2] buy and finance qualifying investment real estate **inside** the plan, and generally keep the financed rents and gains free of the unrelated debt-financed income tax that applies to an IRA, **provided the plan, the property, and the loan are structured correctly**.[5,6] Get the structure right and the plan becomes a tax-advantaged real estate engine. Get it wrong and a single prohibited transaction can disqualify the plan and trigger immediate taxes and penalties.[8,9]

> READ THIS BLUEPRINT IN ORDER
>
> The Solo 401(k) reward is large, but the rules are sequential. You must understand **how the plan is funded**, **how UDFI works**, and **what counts as a prohibited transaction** *before* you sign for non-recourse financing or record a deed in the plan's name. This blueprint walks through that exact order, then drills into the leverage strategy, the danger lanes, and the traps that catch real estate professionals most often.

Nothing here is tax or legal advice. Every transaction should be reviewed with a CPA, ERISA counsel, and your plan document provider before execution. Dollar figures reflect 2026 IRS limits.

02 · THE MECHANICS

What a Solo 401(k) Actually Is

A Solo 401(k), also called an individual or one-participant 401(k), is a qualified retirement plan under Internal Revenue Code Section 401(a) that covers a business owner with no full-time common-law employees, other than the owner and the owner's spouse.[5] Because you are simultaneously the **employer** and the **employee**, you get two contribution channels: salary deferrals as the employee, and profit-sharing contributions as the employer.

Who qualifies.

You need self-employment activity generating earned income, and no employees who work 1,000 or more hours in the year (other than you and your spouse).[5] This fits independent real estate agents and brokers operating through their own LLC or S-corp, solo flippers with entity income, landlords with active management income, and syndicators with sponsor compensation. Passive rental income alone does not generate earned income, so a pure landlord with no other self-employment may not be able to contribute, although they can still **roll in** existing retirement funds and invest them.

The plan document is the rulebook.

A Solo 401(k) must be established under a written, IRS-approved plan document, typically provided by a plan document provider or TPA. The plan document, not this blueprint, governs what your specific plan permits, including whether it allows Roth accounts, participant loans, and self-direction of investments. Adopting and operating **per the document** is what keeps the plan qualified and is what allows the favorable UDFI treatment discussed later to apply.[5]

> EMPLOYER AND EMPLOYEE AT THE SAME TABLE
> The defining feature is the **dual contribution role**. As the employee you defer salary. As the employer you make profit-sharing contributions. For a one-person business, both roles are you, and the combined effect is the largest legal contribution window available to a solo earner.

03 · THE NUMBERS

2026 Contribution Limits

The 2026 dollar amounts below are set by IRS Notice 2025-67 and related cost-of-living guidance.[1,2,3,4] They are the ceiling; your actual contribution is limited by your earned income and, for the employer piece, the contribution-deduction rules.

LIMIT	2026 AMOUNT
Employee elective deferral (pre-tax and Roth)	**$24,500**
Age 50+ catch-up	**$8,000** on top of the deferral
Age 60 to 63 super catch-up (SECURE 2.0)	**$11,250** replaces the 50+ amount in those years
Total annual additions, §415(c) combined	**$72,000** deferrals + employer profit-sharing
Same limit with age 50+ catch-up	**$80,000** $72,000 + $8,000
Same limit with age 60 to 63 catch-up	**$83,250** $72,000 + $11,250
Employer profit-sharing contribution	**up to 25%** of W-2 comp for corps; roughly 20% of adjusted SE income for sole props
Maximum compensation counted, §401(a)(17)	**$360,000** comp above this is ignored for the calc

WHY THIS MATTERS FOR A HIGH-EARNING AGENT

A successful agent or broker earning strong commission income can shelter far more in a Solo 401(k) than in any IRA. The 2026 IRA limit is **$7,500** ($8,600 at age 50+),[2] while a Solo 401(k) can absorb up to **$72,000** or more. For a real estate operator in peak earning years, that gap is the difference between token saving and meaningful tax-deferred compounding.

04 · FUNDING

Funding the Plan

A Solo 401(k) can be funded three ways: new contributions from earned income, rollovers from prior employer plans and IRAs, and (if the plan permits) a participant loan. Together these can quickly give the plan meaningful buying power for real estate.

New contributions.
Employee deferrals come from your compensation (salary if you are on a W-2 through your own corp, or self-employment earnings otherwise). Employer profit-sharing is calculated separately, up to 25% of W-2 compensation for a corporation, or roughly 20% of adjusted net self-employment income for a sole proprietor or partner.[3,4] Timing matters: for a sole proprietor, the plan generally must be adopted by the tax-filing deadline (including extensions) to make contributions for that year, and employee deferrals must be elected and made within the applicable deadlines.[5]

Rollovers.
You can roll old 401(k), 403(b), and traditional IRA dollars into the Solo 401(k) without triggering tax, consolidating stranded retirement capital into one account that can deploy it into real estate. This is how many operators fund a first plan-owned property even in a modest earning year.

Roth vs. pre-tax buckets.
If your plan document allows it, you can split new contributions between pre-tax and designated Roth accounts, and eligible designated Roth balances from prior employer plans may roll in where the plan permits. Confirm Roth rollover eligibility before moving any Roth dollars. Pre-tax dollars grow tax-deferred and are taxed on withdrawal; Roth dollars grow tax-free and come out tax-free in retirement (subject to the rules). For real estate that appreciates and throws off income, the Roth bucket can be powerful, but you must track the buckets separately.

Participant loans (if permitted).
If the plan document permits loans, you may borrow up to 50% of your vested balance, capped at $50,000, repaid over generally five years with level, amortized payments, under the rules of IRC Section 72(p).[11] This is personal liquidity from your own plan, and it is distinct from non-recourse financing used to buy property inside the plan (covered in Section 07).

> **ADMINISTRATION: FORM 5500-EZ**
> A one-participant plan generally does not need to file Form 5500-EZ while total plan assets are at or below $250,000 at year-end, though a final Form 5500-EZ is generally required when the plan terminates, even below that threshold.[5] Track this threshold each year as the plan grows with real estate.

05 · THE UDFI EDGE

Two Tax Engines, Compared

When a retirement account borrows to buy real estate, the financed portion of the income can create **unrelated debt-financed income (UDFI)**, a subset of unrelated business taxable income that may be subject to unrelated business income tax (UBIT).[6] The treatment is very different for an IRA versus a Solo 401(k).

SELF-DIRECTED IRA

STEP 1
Buy a rental with financing
Account borrows to acquire investment real estate

↓ financed share

STEP 2
Debt-financed income = UDFI
Financed portion of rent or gain may be UDFI

↓ may trigger

STEP 3
UBIT may apply
File Form 990-T if gross UBTI is $1,000 or more

SOLO 401(k) · QUALIFIED PLAN

STEP 1
Buy a rental with financing
Plan borrows to acquire investment real estate

↓ financed share

STEP 2
§514(c)(9) carve-out
Qualifying real property held by a qualified plan

↓ generally none

STEP 3
Income stays in the plan
Rents and gains generally remain tax-deferred

Self-directed IRAs are generally subject to UDFI on debt-financed real estate. A properly maintained Solo 401(k) can generally avoid UDFI on qualifying property.

The IRA path.

When a self-directed IRA purchases real estate with debt, the debt-financed portion of the rents and gains is generally UDFI and may be taxed as unrelated business income.[6] If the plan's gross unrelated business income reaches $1,000, a Form 990-T must be filed and tax may be owed at trust tax rates.[6,7] The leverage that makes real estate powerful becomes, for an IRA, a recurring tax filing and a drag on returns.

The Solo 401(k) path.

A properly adopted and maintained Solo 401(k) that qualifies as a tax-exempt qualified plan can generally use non-recourse acquisition debt to acquire **qualifying real property** without generating UDFI, under the carve-out in IRC Section 514(c)(9), when the transaction satisfies the Code's conditions.[5,6,12] In plain terms: the financed rents and gains can generally stay inside the plan and compound tax-deferred (or tax-free in a Roth bucket), instead of being pulled out as UBIT each year.

> **“The IRA pays tax on its own leverage. The Solo 401(k), structured correctly, generally does not.”**

IMPORTANT SCOPE LIMITS

This is **not** a blanket exemption from all UBTI. The carve-out applies to **qualifying real property** held for investment, not to dealer property, active trade or business income, or property used in an unrelated business. It also requires the plan to actually be qualified and properly maintained. Use “generally” and “when structured properly,” never “always exempt.”[6,12]

06 · THE FENCE

The Prohibited-Transaction Fence

Before we touch non-recourse lending, you must understand prohibited transactions, because they explain *why* plan financing must be non-recourse in the first place. Under IRC Section 4975, certain transactions between a retirement plan and a "disqualified person" are prohibited, and engaging in one can trigger excise taxes and, in the worst case, plan disqualification.[8,9,10]

Who is disqualified.

Disqualified persons include the plan participant (you), your spouse, your ancestors and lineal descendants and their spouses, plan fiduciaries and service providers, and certain entities you or these persons control.[8,10] Siblings, cousins, and friends are not automatically disqualified, but dealing with family always warrants counsel. The list is broad enough that the safe default is: **assume a connection is disqualified until a professional confirms otherwise**.

What you cannot do.

A disqualified person generally cannot sell, exchange, or lease property to the plan; lend money or extend credit to (or from) the plan; furnish goods, services, or facilities to the plan; transfer to or use plan income or assets for their own benefit; or act as a fiduciary dealing with plan assets in their own interest.[8,10] Each of these is a real estate trap in disguise (see Section 10).

> WHY THIS FORCES NON-RECOURSE LENDING
>
> Because **you are a disqualified person**, you cannot personally guarantee a loan made to your plan. A personal guarantee is an extension of credit by a disqualified person, which is prohibited.[8,9] That single rule is why plan-purchased real estate must be financed with **non-recourse** debt, secured only by the property itself, with no personal pledge. Read the next section with that constraint in mind.

07 · NON-RECOURSE LEVERAGE

Non-Recourse Leverage, Deep Dive

Non-recourse financing is the mechanism that lets a Solo 401(k) buy real estate it could not afford in cash, while preserving the UDFI edge. Done correctly, the plan borrows, the property secures the loan, and the financed rents and gains generally stay free of UDFI under Section 514(c)(9).[6,12] Done incorrectly, a personal touch anywhere in the stack turns it into a prohibited transaction.

What "non-recourse" actually means here.

The loan is secured **only** by the plan-owned property (or an LLC the plan owns). The lender's remedy in default is the property itself. There is no personal guarantee from you or any disqualified person, no pledge of personal assets, no side letter, and no informal promise to backstop the loan. Any of these reintroduces disqualified-person credit and breaks the structure.[8,9]

THE CLEAN NON-RECOURSE TRANSACTION

- [ ] Loan is made to the plan (or a plan-owned LLC), not to you personally
- [ ] Collateral is the plan-owned property only, no pledge of personal assets
- [ ] No personal guarantee from you, your spouse, or any disqualified person
- [ ] No side letters, co-signers, or informal promises to cover shortfalls
- [ ] Down payment, closing costs, and reserves come from plan or plan-LLC funds
- [ ] Rents, sale proceeds, and gains flow back to the plan or plan-LLC, never to you
- [ ] Repairs, taxes, insurance, and debt service are paid from plan or plan-LLC funds
- [ ] Title and the loan documents name the plan or plan-LLC, not you

The trade-offs.

Non-recourse loans expand purchasing power, but they come with real costs. LTVs are usually lower than conventional financing (often 50% to 70%), interest rates are higher, terms are shorter, and lender requirements are stricter. The lender ecosystem for plan financing is specialized; not every lender offers true non-recourse plan loans, and the right structure depends on the property and the plan.

THE GOLDEN RULE OF PLAN-OWNED REAL ESTATE

Every dollar in and every dollar out moves through the plan or its LLC. The moment personal funds touch a plan asset, or plan income touches a personal account, the firewall cracks. Operate the property as if the plan is a separate investor that happens to be you, because for legal purposes it is.

08 · WHAT FITS INSIDE

Real Estate Inside the Plan: Two Lanes

Not all real estate belongs in a Solo 401(k). The plan is built for **investment** real estate, not active business or dealer activity. Sort any potential holding into one of two lanes before you acquire it.

CLEAN LANE

Investment real estate that fits

- Long-term rental property held for income and appreciation
- Raw land held for investment
- Private notes, deeds of trust, and trust deed investments
- Passive participation in syndications and funds
- Leasing to unrelated third parties at fair market terms

DANGER LANE

Active or dealer activity that does not

- Buy-rehab-resell flips held primarily for resale (dealer property under §1221)
- Active development or construction as a business
- Property management for a fee
- Personally performing repairs, rehab, or brokerage
- Taking a commission from the plan's purchase or sale

Why the lanes exist.

The UDFI carve-out and the plan's qualified status depend on the property being held as a **qualifying investment**. Flipping, dealer inventory, and active management look like a trade or business, which can generate UBTI directly and can threaten the plan's qualified status. Personal labor or commissions paid to you are prohibited transactions. The clean lane keeps the plan a passive investor, which is exactly the posture the favorable tax treatment is designed for.[6,8,12]

A PRACTICAL TEST

Ask: *Is the plan a passive landlord or lender, collecting fair-market income from unrelated parties?* If yes, clean lane. If the plan is the operator, the dealer, or is paying you for your labor, it is in the danger lane and needs professional review before you proceed.

INVESTMENT RESALE VS. DEALER FLIP

Holding a property **more than 12 months** makes a gain long-term for tax-rate purposes, but only if the property is a capital asset to begin with. Property held primarily for resale is dealer property under §1221 and is taxed as ordinary income **regardless of how long you hold it**. A property bought to rehab and resell is dealer property even after 13 or 24 months. A property bought as an investment, rehabbed, rented out, and sold later can qualify for long-term capital-gain treatment after the 12-month mark. The deciding factor is your purpose at acquisition, not the calendar.[13,14]

09 · IN PRACTICE

The UDFI Edge, By Example

A simple, conceptual illustration shows why the structure matters more than the rate. The numbers below are illustrative only, not a projection, and the exact tax depends on the debt-financing percentage and the trust tax rates that apply.[6,7]

SELF-DIRECTED IRA	SOLO 401(k)
Plan buys a $300K rental with 50% non-recourse debt	Plan buys the same $300K rental, same 50% debt
Annual net rent after expenses: $12,000	Same $12,000 annual net rent
Debt-financed portion is UDFI, roughly 50%	Qualifying real property under §514(c)(9)
~$6,000 may be unrelated business taxable income	Generally no UDFI on the financed portion
Above the $1,000 threshold: file Form 990-T	Generally no Form 990-T for this income
Tax may be owed at trust rates, each year	Rents compound inside the plan, tax-deferred

The $1,000 threshold.
A Form 990-T is required when an exempt entity, including a retirement plan, has gross unrelated business income of $1,000 or more for the year, and there is a $1,000 specific deduction against that income.[6,7] For an IRA with debt-financed real estate, that threshold is easy to cross. For a Solo 401(k) holding qualifying property within the carve-out, there is generally no UDFI to report on that property at all.

> **CONCEPTUAL, NOT A CALCULATION**
> We are illustrating **exposure**, not computing exact tax. The real UDFI figure depends on the debt-to-basis ratio under Section 514, deductions, and the applicable trust tax brackets. Have your CPA run the actual numbers for any plan-owned leveraged property.

10 · THE TRAPS

Real Estate Pro Traps

These are the specific mistakes that catch agents, brokers, flippers, and property managers. Each one looks like normal business and each one can be a prohibited transaction that taxes the plan or disqualifies it.[8,9,10]

AVOID THESE WITH PLAN-OWNED REAL ESTATE

- [ ] Taking your real estate commission from the plan's purchase or sale
- [ ] Managing a plan-owned property for a fee you collect personally
- [ ] Personally performing repairs, rehab, or staging on plan property
- [ ] Personally guaranteeing the plan's non-recourse loan
- [ ] Selling property you own to the plan, or vice versa
- [ ] Buying from or selling to a family member or entity you control
- [ ] Paying plan expenses (repairs, taxes, insurance) from personal funds
- [ ] Depositing plan rents or sale proceeds into a personal account
- [ ] Living in, vacationing in, or storing personal items in plan property
- [ ] Using plan property as your office or for any personal benefit
- [ ] Co-owning plan property with a disqualified person without counsel
- [ ] Letting the plan hold dealer property or flips as inventory

THE PATTERN TO WATCH FOR

Almost every trap is the same error wearing a different costume: **personal benefit or personal service touching a plan asset**. If you are about to do something convenient for the plan, stop and confirm with counsel that it is permitted. Convenience is the enemy of compliance.

11 · INTEGRATION

Pairing It With the Autonomous Investor Structure

The Solo 401(k) is the engine. The Autonomous Investor structure is the chassis around it. Used together, the plan holds the real estate inside a tax-advantaged wrapper, while the layered entity structure holds non-retirement assets and helps isolate property-level risk from your personal residence and from the plan itself.

How they connect.
The Solo 401(k) plan, or an LLC wholly owned by the plan, takes title to the investment property. A checkbook-control arrangement, where permitted by the plan document and custodian, lets the plan sponsor write checks and sign documents for plan investments without custodian approval on each transaction. The non-retirement side, the anonymous holding LLC, local operating LLC, and privacy land trust from the Autonomous Investor Blueprint, holds active and non-retirement assets separately.

> **KEEP THE FIREWALLS SEPARATE**
> Do not commingle retirement and non-retirement assets. The plan owns plan property; the LLC structure owns non-retirement property. Crossing them, for example having your operating LLC manage plan property for a fee, is exactly the prohibited transaction the rules guard against. Two structures, two sets of books, no personal benefit flowing between them.

> **“The Solo 401(k) compounds the upside tax-free. The entity structure helps protect the downside. Build both, and keep them apart.”**

12 · IMPLEMENTATION

The Build Sequence

A disciplined order keeps the plan qualified and the first transaction clean. Work top to bottom; do not skip ahead to acquiring property before the plan and accounts exist.

1 **Adopt the plan**
Establish a written, IRS-approved Solo 401(k) plan document before year-end deadlines so contributions count for the target tax year.[5]

2 **Fund it**
Make new contributions and roll in prior 401(k) or IRA dollars. Set up Roth and pre-tax buckets if the document allows.

3 **Form a plan LLC**
If using checkbook control, form an LLC wholly owned by the plan, with the plan (through its trustee) as the sole member.

4 **Open plan accounts**
Open a plan trust bank account or plan-LLC account so every dollar flows through the plan, not you personally.

5 **Line up non-recourse financing**
Engage a specialized non-recourse plan lender. Confirm no personal guarantee and that collateral is the property only.

6 **Acquire qualifying property**
Take title in the plan or plan-LLC name. Stay in the clean lane: investment property, leased to unrelated parties at fair-market terms.

7 **Operate cleanly**
All rents in and expenses out through plan accounts. No personal labor, commissions, or guarantees.

8 **Administer and report**
Track the Form 5500-EZ $250,000 asset threshold, file when required, and review with your CPA annually.[5]

13 · COMMON QUESTIONS

Frequently Asked

Can I really buy real estate inside a Solo 401(k)?

Yes, if the plan document permits self-direction. The plan can hold investment real estate, private notes, and syndication interests, subject to the prohibited-transaction rules.[5,9]

Do I need employees to have one?

No. The Solo 401(k) is for an owner-only business with no full-time common-law employees other than the owner and spouse.[5]

Can my spouse participate?

Yes, a spouse who earns income from the business can have their own account under the plan, which can double the household contribution capacity.[5]

Why must the loan be non-recourse?

Because you are a disqualified person, a personal guarantee would be a prohibited extension of credit to the plan. The loan must be secured only by the plan-owned property.[8,9]

Can I flip houses in the plan?

Generally not. Property held primarily for resale is dealer property under §1221, not qualifying investment real estate, and there is no numeric safe harbor (no “few flips is fine” rule). Flipping inside a plan can generate UBIT and risk its qualified status, regardless of count. Keep flips outside the plan.[6,12,13]

Do I owe tax every year on the rental?

For qualifying debt-financed real property held by a properly maintained qualified plan, generally no UDFI applies under Section 514(c)(9). An IRA, by contrast, may owe UBIT on the financed portion.[6,12]

When is a Form 990-T required?

When gross unrelated business income reaches $1,000 for the year, with a $1,000 specific deduction.[6,7]

Is this tax or legal advice?

No. Every transaction should be reviewed with a CPA, ERISA counsel, and your plan document provider before execution.

Disclaimer. This blueprint is educational and general in nature, prepared by Survival 401k for prospective clients. It is not tax, legal, or investment advice, and no attorney-client or advisor relationship is created by reading it. Tax rules and dollar limits change; the 2026 figures shown reflect IRS Notice 2025-67 and related guidance current as of publication. UDFI and UBIT outcomes depend on the specific facts, the debt-financing ratio, the plan’s qualified status, and proper maintenance. Prohibited transactions can trigger excise taxes and plan disqualification. Review every transaction with a qualified CPA, ERISA counsel, and your plan document provider before acting. Past performance and illustrative examples are not indicative of future results.

14 · NEXT STEP

Build Your Solo 401(k) Blueprint

THE FIRST MOVE IS A CONVERSATION

Put the UDFI edge to work.

Book a complimentary Solo 401(k) Strategy Session. In one session we'll map your earned income, estimate your 2026 contribution capacity, and show you how a properly structured plan could acquire qualifying real estate with non-recourse leverage while generally avoiding the UDFI that traps an IRA, before another deal closes outside the plan.

About Survival 401k

Survival 401k designs Solo 401(k) and asset-protection architectures for real estate professionals, investors, and small-business owners. We pair an IRS-compliant Solo 401(k) engine with the layered Autonomous Investor entity structure (an anonymous holding LLC, a local operating LLC, and a privacy land trust) so retirement capital and non-retirement assets each sit in the right wrapper. The result is a coordinated system built for tax-advantaged growth, isolation of risk, and reduced public visibility.

CONNECT WITH SURVIVAL 401k

Scan to watch the free video and book your Solo 401(k) Strategy Session.

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Sources

1. IRS, *401(k) limit increases to $24,500 for 2026; IRA limit increases to $7,500* (IR-2025-111), irs.gov

2. IRS, *Notice 2025-67*, Cost-of-Living Adjusted Limitations for 2026 (elective deferrals $24,500; catch-up $8,000; ages 60 to 63 super catch-up $11,250; §415(c) combined $72,000), irs.gov

3. IRS, *Retirement Topics: 401(k) and Profit-Sharing Plan Contribution Limits* (combined limit $72,000 / $80,000 with catch-up / $83,250 ages 60 to 63; comp cap $360,000), irs.gov

4. IRS, *Publication 560, Retirement Plans for Small Business* (employer profit-sharing deduction up to 25%; 2026 elective deferral $24,500; comp cap $360,000), irs.gov

5. IRS, *One-Participant 401(k) Plans* (eligibility, plan adoption, Form 5500-EZ $250,000 filing threshold, spouse participation), irs.gov

6. IRS, *Publication 598: Tax on Unrelated Business Income*, Unrelated Debt-Financed Income (UDFI) under IRC §514, and the qualified-plan carve-out for qualifying real property under §514(c)(9); $1,000 Form 990-T filing threshold and specific deduction, irs.gov

7. IRS, *Instructions for Form 990-T* (filing threshold, trust tax treatment of unrelated business income), irs.gov

8. Legal Information Institute, Cornell Law School, *26 U.S.C. §4975*, Tax on Prohibited Transactions and disqualified persons, law.cornell.edu

9. IRS, *Retirement Plan Investments FAQs*, prohibited transactions, disqualified persons, and non-recourse financing for plan-purchased real estate, irs.gov

10. IRS, *Retirement Topics: Tax on Prohibited Transactions* (excise taxes and plan disqualification), irs.gov

11. IRS, *401(k) Plan Fix-It Guide*, Participant loans under IRC §72(p) (50% / $50,000 cap, five-year repayment), irs.gov

12. Legal Information Institute, Cornell Law School, *26 U.S.C. §514*, Unrelated Debt-Financed Income, including the §514(c)(9) exception for qualifying real property acquired by a qualified plan, law.cornell.edu

13. Legal Information Institute, Cornell Law School, *26 U.S.C. §1221*, capital-asset definition and the exclusion for property held primarily for sale to customers in the ordinary course of a trade or business (dealer property), law.cornell.edu

14. IRS, *Publication 544: Sales and Other Dispositions of Assets*, capital-asset holding periods under IRC §1222 (long-term = more than 1 year; short-term = 1 year or less), irs.gov