

**THIRTY-FOURTH ANNUAL
PARTNERSHIP, LLC & S CORPORATION
TAX PLANNING FORUM**

PROGRAM

This program is presented in a transactional format, so the faculty members will utilize practical examples to illustrate the issues to be discussed. Questions will be taken from the audience during the live stream program, at breaks and after the program. An analysis of recent legislation and the latest cases, regulations and rulings will be integrated into each session. Program content and timing are based upon the current status of the law and may be modified if warranted by new developments. (Some of the program may not be covered orally.)

STRUCTURING TECHNIQUES FOR 2020 AND BEYOND – A DAY OF CLOSELY HELD BUSINESS PLANNING

- The new CARES Act §163(j) business interest deduction limitations and analysis of the final regulations, if issued
- Analysis of §199A developments and structuring techniques to maximize the §199A deduction
- The expected proposed carried interest regulations - what interests are covered?
- Planning opportunities and avoiding pitfalls under the final revised §752 regulations

FORUM XXXIV'S TOP TEN: 2020'S MOST SIGNIFICANT STRUCTURING TECHNIQUES AND AVOIDANCE OF FOOT FAULTS

HOT PARTNERSHIP AND LLC TOPICS FOR 2020 AND BEYOND

- Planning opportunities under the final Qualified Opportunity Zone regulations, including integration with §1202 stock
- The CARES Act changes to the NOL and excess business loss rules and preparing for 2021 reversion to the TCJA rules
- §704(b) and §704(c) structuring issues and techniques
- What qualifies as real property under the anticipated proposed §1031 regulations
- *Bordelon* and the renewed IRS challenge to partner guarantees under the at-risk rules
- The IRS changes to partnership K-1 reporting
- A potpourri of recent partnership and LLC developments

HOT S CORPORATION TOPICS FOR 2020 AND BEYOND

- The §1371 proposed regulations and post-TCJA PTP distributions
- To revoke or not to revoke a §168(g)(7) election to depreciate under ADS
- Developments in the valuation of gifts of flow-through entity interests
- A potpourri of recent S corporation developments

Program materials and presentations will provide information relating to the covered subject matter. None of the presenters, authors or publisher will be rendering legal, accounting or other professional advice. If such advice is required, it is strongly recommended that a professional adviser be engaged.