

Estate and Gift Tax Valuation Update

Presented by: David A. Maschino, ASA

Learning Objectives:

Participants will learn how various tax court precedent affects the valuation of closely held business ownership interest for estate and gift tax reporting, succession planning, ownership transfer, and dispute resolution purposes.

Level of Difficulty: Advanced.

Bullet Points / Outline

- Why these cases remain important if Estate and Gift Tax is repealed or becomes immaterial, Repeal of code sec 2704 proposed regulations - 10 minutes
- Fractional Interests in Real Property: Ludwick v. Commissioner - 10 minutes
- Built-in-Capital Gains Tax Exposure: Jones v. Commissioner, Dailey v. Commissioner, Jelke v. Commissioner, Litchfield v. Commissioner – 15 minutes
- Tax Affecting of Pass Through Entities: Cecil v. Commissioner, Gross v. Commissioner – 15 minutes
- Succession Planning, Ownership Transfer, and Dispute Resolution Implications – 10 minutes

Total time: 60 minutes