

Corporate Redemptions & Liquidations

Objective: This course will provide an excellent overview of the tax rules governing: (1) corporate redemptions; and (2) partial and complete liquidations. It will address the tax consequences to both the shareholders and the corporation.

What you will learn:

- The three statutory ways a redemption can qualify for capital gain treatment
- The ownership attribution rules of Code Section 318
- The requirements of a “partial liquidation”
- The rules governing the liquidation of a controlled subsidiary
- The rules pertaining to a complete liquidation
- Special nuances applicable to S corporations
- Lessons to be learned from court cases and IRS rulings
- Estate and gift tax planning considerations
- Non-tax reasons to engage in these transactions

CPE: 4 hours

Level: Overview

Category: Tax

Prerequisites: None

Instructor: Dennis J. Gerschick