

S Corporations: Tax Practice and Analysis, 2nd Edition

Schlesinger, Michael

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S Corporations Tax Practice And Analysishc2000

Ira Fox



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S Corporations Michael Schlesinger, 2002 *The S Corporation* Irving Schreiber, Sydney S. Traum, 1983-01-01 Written by one of the nation's leading authorities on S corporation taxation this 1 000 page volume has been the standard bearer in its field for over 30 years Professionals at every major accounting firm in America depend on this unmatched resource for Comprehensive coverage on how the Small Business Tax Protection Act affects S corporation taxation Up to date coverage of all the Subchapter S rules and regulations and how they affect the election planning operation and termination of today's S corporations Hands on analysis practical guidance on how to make relevant rules and regulations work for your clients filled in tax returns 1120S sample forms and even step by step instructions on how to handle situations for which the IRS does not supply printed forms Quarterly supplements that keep you posted on all relevant IRS legislative and judicial activity Quarterly issues of S Corporation Alert shipped with every supplement to keep you absolutely current with late breaking news **S Corporations** M. Kevin Bryant, 1996-11-01 *S Corporation Tax Practice Manual* Ira Fox, 1990-11-01 *S Corporation Taxation* Robert W Jamison, CPA, PH.D., 2007-12 The S corporation is the most popular entity for closely held businesses but the rules that regulate S corporations and make it a popular choice are complex confusing and changing CCH's popular S Corporation Taxation offers an in depth and comprehensive analysis to S corporation taxation and uses extensive examples to illustrate both simple and complex situations In areas where authorities do not provide clear guidance the author constructs plausible courses of action with appropriate analysis Published annually S Corporation Taxation focuses on the rules of Subchapter S of the Internal Revenue Code and integrates these rules with other portions of the tax law that can have substantial impact on S corporations and their shareholders At the end of each chapter are pertinent checklists worksheets and sample election letters to help apply the concepts discussed to the reader's actual work **Federal Income Taxation of S Corporations** James S. Eustice, Joel D. Kuntz, 1991-01-01 This looseleaf treatise examines all the rules and regulations applicable to the S corporation in detail The work combines practical planning guidance with tax analysis on the election operation and termination of the S corporation status **Tax Information on S Corporations**, 1994 *S Corporation Tax Practice Manual* Ira Fox, 1991-11-01 *Practical Guide to Corporate Taxation* Dominic Daher, Joshua Rosenberg, Steve Johnson, 2012-02-14 Practical Guide to C Corporations offer practitioners current and practical explanation and analysis on corporations giving them the guidance needed to manage the C Corporation election compliance tax planning and life cycle needs In addition to thorough coverage of how the tax laws impact C corporations the Practical Guide details corporate formation distributions redemptions liquidations reorganizaitons and issues related to corporate tax practice and procedure Practical Guide to C Corporations provides business entity practitioners with complete coverage of C corporation taxation issues **Federal Income Taxation of S Corporations** John K. McNulty, 1992 Provides introductory explanation of the purposes and uses of the federal income tax law relating to S corporations Topics include acquiring and maintaining the S

status tax issues and consequences effects of the S election to shareholders and tax free reorganizations and divisions of S corporations as well as comparisons to C corporations and partnerships S Corporation Taxation Robert W Jamison, CPA, PH.D., Robert W. Jamison, 2006-12-01 S Corporation Taxation Guide offer comprehensive analysis of S corporation taxation using extensive examples and illustrations **Taxation of S Corporations in a Nutshell** Douglas A. Kahn, Jeffrey H. Kahn, Terrence G. Perris, 2008 This book covers the following topics the qualification requirements for a subchapter S election the allocation of tax items among the shareholders the effect of those allocations on a shareholder's basis in stock and debt the limitations on the deduction of pass through items the treatment of corporate distributions the voluntary and involuntary termination of subchapter S status the treatment of the year in which a subchapter S election is terminated the limited availability of certain subchapter S provisions after a subchapter S election is terminated and the taxation of an S corporation's passive investment income and built in gains S Corporation Taxation (2020) Robert W Jamison, 2019-12-17 S corporations at present are the largest tax filer in the United States of America This book provides in a single volume a complete guide and reference tool for the tax practitioner to solve the many problems arising in regard to S corporate taxation Code Sec 199A generally allows shareholders of an S corporation a 20% deduction on S corporate income plus special rules for tangible property acquisitions Because there were ambiguities in the statute on August 8 2018 the Treasury issued proposed regulations to interpret Code Sec 199A This 8th edition at 725 provides an extensive detailed discussion of the proposed regulations with many examples to explain the operation of Code Sec 199A While this book does not cover every single case ruling or procedure on a particular point the reader is provided with the main case or point in a particular area so that this situation can be understood quickly To assist the reader tax planning situations are presented throughout the book As an example *Majestic Star Casino* 2013 1 USTC 50 338 3rd Cir 2013 discussed at various points in the book held that the S election is a personal right in bankruptcy not a property right thus if the shareholders of an S corporation revoke the S election just before filing the corporation's bankruptcy petition it is not a transfer in fraud of creditors and the shareholders are not responsible for the S corporation's debts unless they personally guaranteed them In re *Health Diagnostic Laboratory Inc* 578 B R 552 126 AFTR 2d 2017 6736 Bankr ED Va 2017 sustained this same result in the 4th Circuit *Scott Singer Installations Inc* TC Memo 2016 161 discussed at 904 10 involved a case where a shareholder claimed his contributions of cash into his S corporation were loans but there was no documentation of the loans on the corporate books The contributions were made during a period of both corporate profitability and loss The Court felt that during profitable periods the contributions were loans but during losses were contributions to capital This book is organized into sixteen chapters Chapter 1 discusses the tax considerations in electing S corporate status as well as the advantages and disadvantages of S corporate taxation Chapters 2 10 detail operations of an S corporation discussing the statutory requirements to be an S corporation the types of taxpayer who can qualify as shareholders considerations that one must

make before converting a C corporation to S status etc Chapter 11 sets forth income and estate planning situations for S corporations Chapter 12 covers changes which could occur in the life of an S corporation namely termination and revocation of the S corporate status sale of S corporate stock reorganization of the corporation etc Chapter 13 provides the reader with a comparison of S corporations to other business entities such as one person limited liability companies partnerships and C corporations Chapter 14 discusses S corporation subsidiaries Chapter 15 employee stock ownership plans ESOPs for S corporations and Chapter 16 a detailed discussion of the final and proposed regulations under Code Sec 1411 The author attempts to keep this book current and up to date Thus 724 in Chapter 7 discusses the final tangible property regulations which went into effect as of January 1 2014 and as aforesaid 725 discusses in detail Code Sec 199A and its proposed regulations Further the Appendices provide practical information for the tax practitioner to utilize in his or her practice This book is not intended to apply to all circumstances and the Forms contained herein may not be applicable in every situation Further the law is constantly changing in the field of S corporations Accordingly it is strongly urged that the current status of all statutes case law rulings regulations revenue procedures announcements notices Forms and or applications thereof be confirmed before relying on the information set forth in this book It should be noted that in writing this book the author has attempted to make the table of contents read like an index The reader has three easy means to solve a problem or locate a topic the Contents Contents in Detail on page xiii and the Index In addition the author has provided a table of cases statutes treasury regulations rulings and procedures so that the reader will have an easy to use method to solve a specific problem To assist the reader in practice the Appendices supply sample language for various situations regarding S corporations This book is intended to remove some of the mystery surrounding S corporations and their complexities Because of its thoroughness multitudinous examples and tax pointers this book should provide the reader with a unique resource tool to be utilized as a major addition to a tax library

S. Corporation Taxation (2009) ,2008-11 *Taxation of Business Entities* Samuel C. Thompson,2001 The organization operation and taxable sales and liquidations are studied on a comparative basis first looking at C corporations then partnerships and then S corporations The last area reorganization pertains only to corporations The final chapter in each part focuses on the tax policy aspects of the particular topic The overall structure of the book should facilitate a comparison of the doctrines governing the taxation of the three forms and thereby give the student an enhanced understanding of the policy rationales underlying our system of business taxation

S Corporations Horacio E. Sobol,Samuel P. Starr,Tax Management Inc,Bloomberg BNA., reviews the special tax status of S corporation shareholders While S corporations generally avoid federal income tax at the corporate level S corporation shareholders are taxed pro rata on the corporation s income which is passed through to them whether or not distributed The character of various items passed through to shareholders whether separately or non separately stated is discussed Adjustments to the shareholders stock basis and indebtedness basis are explained in detail and practical advice in creating basis is provided The

at risk and passive activity loss rules are reviewed and the net investment tax impact is introduced The impact of the alternative minimum tax at the shareholder level is summarized Taxation of fringe benefits qualified plans and compensating S corporation shareholders is discussed along with practical insights A practical discussion on S corporation shareholder buy sell agreements is provided 2001 S Corporation Tax Guide Robert W Jamison, CPA, PH.D., Robert W. Jamison, 2000-10-21 Our Guide will lead you through the critical and complicated issues facing S corporations in the midst of drastic tax changes The Guide dissects routine and unusual transactions affecting S corporations and delivers hundreds of real world examples Everything you need to know about establishing or maintaining an S corporation tax structure is here Details of the recent installment sale partial repeal Proven ways to reorganise the business tax free Suggestions for change to cash method of accounting New tax year change rules that can accelerate an S election Analysis of the conflict among various Circuit Courts of Appeal regarding corporate cancellation of debt income and shareholder Coverage of new litigation in the at risk area Practical estate planning considerations that keep the IRS at bay On target advice based on hundreds of real life situations Ready to go checklists worksheets and sample election letters at the end of each chapter FREE CD ROM containing the full text of recent landmark S Corporation cases and IRS letter rulings referenced in the book **The S Corporation Answer Book** Sydney S. Traum, Judith Rood Traum, 1994-01-27 This quick reference manual lets you help clients take full advantage of their S Corporation status minimize their taxes It leads you directly to authoritative information on every aspect of the S corporation enabling you to Take full advantage of the 1997 Taxpayer Relief Act Arm the S corporation against the potential tax traps hidden in the Small Business Tax Protection Act Maximize the tax benefits of S corporation status Identify dispositions that will trigger the built in gains tax Avoid added tax liability or loss of S corporation status from passive investment income Capitalize on the permissible differences in stock rights to facilitate estate planning ownership transfers Determine allocation of income losses deductions in the termination year of the S corporation Plus there are citations to the controlling rules regulations court decisions that will save you hours of research How to Do Tax Planning for S Corporations Richard B. Robinson, Arthur A. Weiss, *S Corporation Taxation (2022)* Robert W. Jamison, 2021-11-12 S corporations at present are the largest tax filer in the United States of America This book provides in a single volume a complete guide and reference tool for the tax practitioner to solve the many problems arising in regard to S corporate taxation Code Sec 199A generally allows shareholders of an S corporation a 20% deduction on S corporate income plus special rules for tangible property acquisitions Because there were ambiguities in the statute on August 8 2019 the Treasury issued proposed regulations to interpret Code Sec 199A This 8th edition at 725 provides an extensive detailed discussion of the proposed regulations with many examples to explain the operation of Code Sec 199A

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