€TRAINING

Taxation of Pass Through Business Entities

4 - 8 November 2024
Madrid (Spain)

Taxation of Pass Through Business Entities

REF: TR1918 DATE: 4 - 8 November 2024 Venue: Madrid (Spain) - Fee: 5300 Euro

Introduction:

The taxation of pass-through business entities, such as Subchapter S corporations, partnerships, and limited liability companies, under U.S. federal income taxation is covered in this training program.It focuses on the requirements of Subchapters S and K of the Internal Revenue Code that apply to the creation, management, and dissolution of pass-through organizations, as well as the associated Treasury Regulations and judicial decisions.

Program Objectives:

At the end of this program, the participants will be able to:

- Avoid double taxation.

- Simplify tax filing processes.

- Effectively manage and monitor business income.

- Gain expertise in partnership and corporate taxation, or advance LL.M. studies.

- Expand their professional practice into business entity taxation.

Targeted Audience

- Members of the financial accounting team.

- Finance managers and employees in cost and management accounting.

- Budget supervisors.

- Experienced lawyers.

- Financial commitment and participants in the project.

- Members of the acquisition team and investment analysts.

Program Outline:

Unit 1:

Partnership Formation:

- Partnerships.

- Legal Framework.

- Special Basis Concepts.

- Other Issues.

- Nonrecognition Provision.

- Basis Determination & Holding Period.

Unit 2:

Partnership Operations:

- Income Measurement & Reporting.

- Partner's Distributive Share.

- Outside Basis Adjustments.

- Partners' Deduction for Qualified Business Income.

- Partner Loss Limitations.

- Related Transactions.

Unit 3:

Partnership Distributions:

- Concepts.

- Applications.

- Disproportionate Distributions.

Unit 4:

Partnership Sales and Terminations:

- Seller.

- Buyer.

- Special Basis Adjustment.

- Other Dispositions.

- Partnership Termination.

Unit 5:

Taxation Considerations:

- Initial Costs.

- Accounting Methods.

- Tax Year.

- Applications.