

Taxation of Corporations Business Entities





# **Taxation of Corporations Business Entities**

REF: TR1917 DATE: 9 - 13 December 2024 Venue: Kuala Lumpur (Malaysia) - Fee: 5300 Euro

#### Introduction:

The federal income taxation of corporations and their shareholders in the United States is introduced in this training program. It on the requirements of Subchapter C of the Internal Revenue Code that apply to the creation, operation, distribution, and dissolution of corporations, as well as the associated Treasury Regulations and judicial decisions.

## **Program Objectives:**

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

- Have a relatively brief summary of a business entity tax topic.
- Specialize in partnership and corporate taxation or are working on an LL.M.
- Expand their practices into business entity taxation.
- Practice in the area of 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:

#### Overview of Business Taxation:

- Origins of Taxation.
- · Sources of Tax Law.



- Judicial Doctrines.
- Hierarchy of Tax Law Sources.
- · Fundamental Features.
- Strategic Form Choice.

### Unit 2:

## Corporate Income Taxation:

- Income Tax Formulas.
- · Dividends Received Deduction.
- Organizational Expenditures Deduction: Concepts.
- Regular Corporate Income Tax Liability.
- Corporate Alternative Minimum Tax.
- Penalty Taxes on Corporate Accumulations.

#### Unit 3:

### Corporate Formation I:

- Acquisition and Disposition Recognition.
- Character Recapture.
- Recapping Recapture.
- Sunchaser Shakery Introduction to Non-Recognition Provisions.
- Non-Recognition Provisions: Concepts Applications.
- Basis Determination & Holding Period: Concepts Applications.
- Built-In Loss Property: Concepts Applications.
- Treatment of Boot Concepts Applications.

## Unit 4:

#### Corporate Formation II:

• Assumption of Liabilities: Concepts Applications.



- Property and Services: Concepts Applications.
- Capital Contributions: Concepts Applications.
- Debt versus Equity: Concepts Applications.
- Investor Losses: Concepts Applications.
- Small Business Stock: Concepts Applications.

### Unit 5:

### **Taxation Considerations:**

- Related Corporations Differences.
- Compliance Procedures.