



Taxation of Corporations Business Entities



24 - 28 June 2024
Paris (France)



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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 Shakerly 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.