GASSMAN CROTTY & DENICOLO P.A.
ATTORNEYS AT LAW

THE THURSDAY REPORT

Issue # 266 Thursday, May 9, 2019

Re: The Mo-Thurs-day Report

In This Issue:

We welcome contributions for future Thursday Report topics. If you are interested in making a contribution as a guest writer, please email Alan at agassman@gassmanpa.com

Quote of the Week

Just got back from a pleasure trip: I took my mother-in-law to the airport.

-Henny Youngman

Understanding the Elements and Distinctions of the Bona Fide Sale Exceptions to Internal Revenue Code Sections 2035 and 2036

by Chris Denicolo

There are two bona fide sale exceptions that apply in the context of Internal Revenue Code Section 2036 and Section 2035.

First, the bona fide sale exception under Internal Revenue Code Section 2036 applies to remove any transfer of assets from the reach of estate tax inclusion under Internal Revenue Code Section 2036(a) if the taxpayer makes a transfer under a "bona fide sale for an adequate and full consideration in money or money's worth." This means that any transfers by a taxpayer for which the taxpayer has received adequate and full consideration under a bona fide sale arrangement will be excluded from his gross estate for federal estate tax purposes under Internal Revenue Code Section 2036.

This exception is important in the context of the widely used installment sale to a grantor trust transaction whereby the grantor sells assets to a trust in exchange for a promissory note with a face value equivalent to the fair market value of the assets transferred. This exception can also apply in a situation where a taxpayer funds a family limited partnership in exchange for partnership interests, although the IRS has argued for a very narrow application of the exception in this context.

Specifically, the line of cases concerning this exception typically involves the IRS arguing that the bona fide sales exclusion does not apply unless: (a) the taxpayer receives back an interest in the entity pro rata with capital account and distribution rights; and (b) there are one or more substantial business purposes for the entity that are not related to estate and gift tax savings.

The latter prong of this argument sets the bar very high, and entities that are formed for strong bona fide reasons (such as to avoid family disputes, to consolidate assets for management and wealth protection purposes where there is a purpose for doing so, and/or to address serious creditor protection concerns) have a greater chance of meeting this exception.

If the exception does not apply, then the IRS could argue that all assets of the entity should be included in the taxpayer's gross estate for federal estate tax purposes under Internal Revenue Code Section 2036.

Internal Revenue Code Section 2035(a) causes any transfer of an interest in or relinquishment of a power with respect to any property which would have been included in the taxpayer's gross estate under Internal Revenue Code Section 2036 to continue to be owned by the taxpayer for federal estate tax purposes for three years after the transfer or relinquishment. This is essentially causing a gift of assets or gratuitous transfer of an interest in a partnership to continue to be in the taxpayer's gross estate for federal estate tax purposes for three years after such transfer.

However, Internal Revenue Code Section 2035(b) provides that this three-year rule does not apply to any bona fide sale for an adequate and full consideration in money or money's worth.

The IRS and courts have not interpreted this exception as narrowly as the exception under Internal Revenue Code Section 2036, despite the similarity in language for both exceptions.

The courts have consistently held that the 2035(b) exception can only apply where there is a bona fide sale that is made in good faith. This does not preclude intra-family transfers from falling in the exception but might subject such transfers to a closer degree of security than transactions between unrelated parties.

The most important component associated with this exception is the adequacy of the consideration in the transaction. Specifically, the courts have found that "a bona fide sale for an adequate and full consideration in money or money's worth" means that there must be the kind of consideration that is typically found in an arms-length business transaction which provides the transferor with the full value thereof in money, property or services, or in a benefit of equivalent money value.

There does not seem to be a requirement that a substantial business purpose exist for the sale transaction, which the IRS has applied in the context of the Section 2036 bona fide sale exception.

Therefore, practitioners should take advantage of this wider exception under Internal Revenue Code Section 2035 if a client is going to transfer or relinquish any rights associated with an entity or other property which might otherwise cause inclusion if the entity interest or property is gifted or transferred for less than adequate consideration.

Proposed vs. Final Regulations Under Section 199A

By Brandon Ketron

CPAs and other tax advisors have a heavy burden deciding what to do under Section 199A planning

For 2018, each taxpayer can elect to rely upon either (a) the Proposed Regulations that came out in July of 2018, or (b) the Final Regulations that were released in January, and re-released in corrected form in February of this year.

In particular, radiologists, pathologists, and other medical practitioners and businesses who do not have direct patient contact may not be considered to be a “specified trade or business” (“SSTB”), and may be able to take the deduction on K-1 income for 2018.

The following chart gives good reasons to rely upon the Proposed Regulations, and possible problems from not being able to rely upon the Final Regulations.

Reasons to Rely Upon Proposed Regulations for 2019	**Reasons to Rely Upon Final Regulations for 2019**
A flow-through entity renting property to a commonly controlled C corporation will be considered an active trade or business whereas the Final Regulations require that the property be rented to another flow-through entity or an individual.	Taxpayers may take into account Section 743 basis adjustments including 754 elections for partnerships.
The field of health was limited to those who provide medical services directly to patients which could be beneficial for those in the health field that do not have direct contact with patients.	Taxpayers may aggregate at the entity level.

If an entity provides services to a commonly controlled SSTB then such entity will be treated as part of the SSTB that it is providing services to. This could be beneficial to taxpayers within the phase-out range m which the entity providing services does not have sufficient wages or qualified property to qualify for the Section 199A deduction and would be impacted by the double phase-out. The Final Regulations require the entity providing services to be treated as a separate SSTB which would require separate testing under the wage and qualified property test.	UBIA will be carried over for contributions of property to a partnership or an S corporation.
ESBTs - Election Small Business Trust may be able to use 2 threshold limitations, one for the S portion of the trust and another for the non-S portion of the trust under the Proposed Regulations.	The incidental rule that would require an SSTB offering products or services as part of the SSTB to be more than 5% of gross receipts in order to be considered separate and apart from the SSTB.
Examples under the multiple trust rules were deleted from the Final Regulations which provide additional guidance on when a trust is considered to have substantially different beneficiaries.	Presumption that an employee 1s an independent contractor will only last for 3 years and additional guidance is provided through examples in the Final Regulations on how the presumption can be rebutted.
	Under the anti-abuse rules the Proposed Regulations provided that if the trust was funded for the "significant purpose of receiving a deduction under Section l 99A" it would not be respected whereas the Final Regulations changed this to "a principal purpose of using more than one threshold" which seems to be a lesser standard.
	The Final Regulations do not include a presumption that the trust was formed or funded for a principal purpose if a significant income tax benefit would result.
	Trusts have the ability to take into account distributable net income "DNI" deduction for distributions made from a trust.

Business Owner Insights: Planning Towards a Smooth Transition

by Anatoly Iofe

Born and raised in Leningrad, USSR, Anatoly Iofe has over 18 years of experience solving complex financial objectives for some of the most prominent global families, businesses, and governments. During his tenure in the financial services industry, Anatoly has successfully structured and executed over USD 15 billion worth of financial transactions, globally.

Anatoly re-joinined UBS from IceBridge Capital, where he was the CEO, responsible for global sales and coverage. Earlier in his career, he worked at UBS Investment Bank in London, UK, as Managing Director, responsible for Emerging Markets Financing business in London, Zurich and Moscow.

Before UBS, Anatoly held various senior roles at Merrill Lynch, Deutsche Bank, National Bank TRUST in Moscow and London, and Bank of America and Wells Fargo Bank in New York.

Anatoly graduated from Leningrad Restaurant Management & Culinary Arts College, and holds a Master of Business Administration from University of Florida. Anatoly speaks English and Russian.

Business Owner Insights

Planning towards a smooth transition

UBS

In representing business owners it is important to make sure the following three pillars of objectives are attended to:

1 Maximizing the value of the business

2 Planning wealth beyond the business

3 Living and enjoying life after the business

This report titled, *Planning towards a smooth transition*, the first in our new series *Business Owner Insights*, provides a framework for how you can drive the value of your business and take it to the next level. It's not only about how you grow your revenue or income. It's about solidifying the value of your business to help make it more appealing to buyers.

Want to learn more?

See our recently published whitepaper, *Preparing for a Strategic Exit: Your guide to unlocking a lifetime of work*, or connect with your UBS Financial Advisor.

Planning for the future

Business transition planning is perhaps one of the most complex tasks you will encounter. You probably have a substantial portion of your family wealth invested in the business—and this then entails broader financial planning strategies to address retirement and estate planning needs. Our framework will help with your eventual transition out of your business, on your own terms and timeframe.

Many business owners lack a comprehensive plan to pass on their business. Now is the time to give a formal business transition plan serious thought. A well-crafted transition plan identifies a long-term strategy that can inform short-term decisions. We suggest planning along three strategic dimensions: A Liquidity strategy to help provide cash flow for short-term expenses, a Longevity strategy for longer-term needs and a Legacy strategy for needs that go beyond your own.* Organizing your wealth this way can help you pursue what matters most—for today, tomorrow and for generations to come.

Who's the Boss?

41%

of business owners intend to exit their businesses within the next 5 years **but almost 50% don't have a transition plan**

"I believe I could sell in a year, but I haven't prepared."

75%

"I have no strategy in place to shield sales proceeds from taxes."

37%

"I have never appraised my business."

58%

Source: *UBS Investor Watch* Report "Who's The Boss," February 2018 as well as responses to questions not previously published as part of the *Investor Watch* survey and therefore not sourced to a previously published document.

* Timeframes may vary. Strategies are subject to individual client goals, objectives and suitability. This approach is not a promise or guarantee that wealth, or any financial results, can or will be achieved.

What drives the value of your business?

Do you know the value of your business today? Determining a reasonable range is a critical step in transition planning. To get the best price, be certain your business looks its best and that there are no unwelcome surprises during the sale process.

Improve the value of your business

When the time comes to sell a business, many deals collapse during a buyer's due diligence when problems come to light. So, start cleaning things up before it becomes an issue for a buyer.

Would you buy your company in its current condition? What would you pay if you were a potential buyer? Improving the value of your business might require a shift in mindset. Think about what factors a prospective buyer will care about.

– What will drive value for a buyer in the future?

– Will the business continue to operate effectively and grow if you're no longer at the helm?

– What roadblocks should be addressed now, instead of closer to the sale?

Reducing business risk or revitalizing it is a top priority in a proactive transition strategy. How can you make your business more professional and attractive for buyers? When your business is perceived as a solid opportunity, it may create a competitive buyer environment, increase value, improve negotiation and deal terms and minimize the time to close the sale.

What drives value?

Here are a few examples:

Objective or quantitative factors like

– Healthy diversified income streams

– Consistent and predictable earnings

– Intellectual property

Driven by, but not limited to

– Changes in revenues

– Gross and net margins

– Operating costs

And subjective or quantitative factors like

– Strategic business plan

– Management team strength

– Economic market outlook

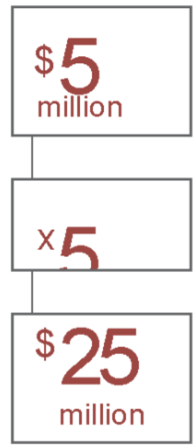
Understanding business value: Why EBITDA matters

Buyers often value businesses based on a cash flow measure called EBITDA (earnings before interest, taxes, depreciation and amortization). The EBITDA metric gives a standard short-term snapshot of the raw earnings potential of your business.

To get a ballpark value for your business, multiply EBITDA by a multiple

The multiple typically falls within a range. It's set by recent deal activity in your industry, and it moves with supply and demand. For example, a company with $5 million of EBITDA and a multiple of 5 could be worth $25 million.

Certain techniques can increase EBITDA while others can increase the multiple. With a focus on forward-thinking and strategic planning, you can take steps to improve your enterprise value. Figure out your company's enterprise value in consultation with an investment banker or a valuation specialist.



A company with $5 million of EBITDA and a multiple of 5 could be worth $25 million

Additional tips:

- Assess your business's market valuation periodically using EBITDA or another metric such as revenue that may be used in your industry

- Know how much of the value will support your family and your goals for tax-efficient philanthropic giving as part of the sale

- Start your early-stage planning conversations with your UBS Financial Advisor, who will bring the resources you need to support your business goals and your long-term wealth preservation and planning concerns

To view the complete article, please click [HERE.]()

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The Ten Biggest Mistakes Made on Gift Tax Returns and How To Avoid Them

By Ken Crotty

1) The gift tax return does not contain sufficient information to provide "adequate disclosure" to the IRS. This prevents the statute of limitations on the ability of the IRS to audit the gift from starting to run. As a result, the IRS will have an unlimited time to audit the gift.

2) The return is filed and does not utilize the client's annual exclusion to reduce the value of the reportable gifts that are made. When the preparer does not reduce the value of the reported gifts by the donor's annual exclusions, if applicable, then the preparer is wasting the donor's gift and estate tax exemption which could cause the family to owe unnecessary additional gift or estate tax.

3) The gift tax return does not reduce the value of the reportable gifts that are made for gifts which qualify for the educational or medical exclusion. Similar to Number 2 above, this will waste the donor's gift and estate tax exemption which could cause the family to owe unnecessary additional gift or estate tax.

4) The return misreports gifts to 529 plans that exceed the annual exclusion. Gifts to 529 plans can be spread out ratably over a number of years. If they are not spread out, then a gift to a 529 plan in excess of the annual exclusion will use some of the donor's gift tax exemption which could cause the family to owe unnecessary additional gift or estate tax.

5) The return is prepared assuming that annual exclusion gifts also qualify for the GST tax annual exclusion. Most gifts that qualify for the gift tax annual exclusion that are made to trusts do not qualify for the GST tax annual exclusion, and utilize some of the client's GST tax exemption. If these are misreported, then the client may have less GST tax exemption remaining than what is stated on the return which could significantly impact future

planning.

6) When gifts are made to trusts, the gift tax returns are filed without attaching either a copy of the trust or a brief description of the trust's terms to the return. Pursuant to Treasury Regulations, if a gift tax return is filed without attaching either a copy of the trust or a brief description of the trust's terms to the return then adequate disclosure is not provided to the IRS and the statute of limitations on the ability of the IRS to audit the gift does not start to run.

7) Gifts made to trusts which are not direct skips are reported on Schedule A Part 2 and not on Schedule A Part 3. Returns prepared this way are incorrect and possibly could not provide adequate disclosure.

8) A joint tax return is filed. Spouses may not file a joint tax return. If a joint tax return is filed, this probably will not start the statute of limitations running for any of the gifts that are reported on the return.

9) Mistakes related to gift splitting. As discussed below, married spouses may split the gifts made by both spouses so that the gifts are treated as having been made half by each spouse. There are numerous traps and mistakes related to gift splitting, which may prevent the gift from being split

10) The possibility of opting out of the automatic allocation of GST Exemption is not considered.
If the value of the property that was an indirect skip has decreased when the gift tax return is filed, the return preparer should consider opting out of the automatic allocation of GST Exemption. If the preparer opts out of the automatic allocation, then a second return could be filed allocating GST exemption equal to the reduced value of the property. This technique saves the client's GST exemption. It is important to note that this should only be considered for indirect skips and not direct skips, otherwise GST tax would be payable.

After 20 Long Years, We Are Finally Beginning to Thaw from a Public Domain Ice Age!

By Wesley Dickson

The last time that a body of work, such as books and movies, had been released into public domain was 1998. During this time, Disney was becoming worried that the likeness of its characters was going to be diluted if the public were able to use it freely, however they would wish. Steamboat Willie, the first appearance of the now beloved Mickey Mouse, was debuted in 1928. At the time, the Copyright laws in place protected this rudimentary animation only until January 1st of 2004.

At the urge of Disney, as well as many others, Congress passed the Copyright Term Extension Act (also called the Sonny Bono Act) in 1998. This effectively added 20 years to all currently copyrighted material, protecting Mickey Mouse from the country for 20 more years. At the beginning of 2019, we saw our first entrance into the public domain since Congress passed the act. This year, we saw almost all major works from the year 1923 become available.

Copyright laws, prior to this act, varied depending on the date of first publication. If the work was created in 1978 or later, copyright lasted for the life of the author plus 70 years. If, however, the author was anonymous, the work was written under a pseudonym, or an author was hired to do the work, the copyright lasted for 95 years after first publication or 120 years from year of creation, whichever expires first. The Copyright term for a work pre-1978 varied incredibly, involving several complex factors to consider.

WHAT CAME OUT IN 1923 THAT I SHOULD CARE ABOUT?

1923 was a year filled with great works that, until now, have remained relatively forgotten about. Bambi by Felix Salten, the source of inspiration for Disney's animated film, was released. The Ego and the Id by Sigmund Freud was published this year, as was a number of short stories by famed authors such as Ernest Hemingway and H.P. Lovecraft.

Highlights of comedic written works now available in the public domain include works by P.G Wodehouse and "Bill" Nye. Movies that are available include many popular silent films, including The Pilgrim by Charlie Chaplin and Safety Last! starring Harold Lloyd. Also, Felix the Cat cartoons are now public domain.

Movies also are subject to the same Copyright restrictions as written works. Many classic films from this time have been in the public record for quite some time. Prior to 1968, Copyrights required manual renewal, which many owners failed to do. The Hunchback of Notre Dame is perhaps the most well-known example of this. 1923 cinema classics that are just being let into the public domain include Charlie Chaplin's The Pilgrim and Our Hospitality starring Buster Keaton.

Additionally, there are still dozens of classic books, that people regularly pay for, are available for free, their copyright expired. These books include The Complete Works of William Shakespeare, The Wizard of Oz, Frankenstein, Moby Dick, and many others. Perhaps the work that I am most excited to have available is the famed poem by Robert Frost "The Road Not Taken."

This is no longer a rare phenomenon. When the ball drops on midnight of every year, a new world of past works will be fully available. Works from 95 years in the past. Hopefully these annual releases will help further understand the customs and cultures of the 20th century.

List of Works that Entered the Public Domain on Jan. 1st, 2019

Books:

- Cane by Jean Toomer
- The Prophet by Kahlil Gibran
- Bambi by Felix Salten, illustrated by Barbara Cooney
- The Ego and the Id by Sigmund Freud
- The Inimitable Jeeves and Leave it to Psmith by P.G. Wodehouse
- The Murder of Roger Ackroyd and The Murder on the Links by Agatha Christie
- Saint Joan by George Bernard Shaw
- Other works from Ernest Hemingway, H.P. Lovecraft, Edith Wharton, Aldous Huxley, Winston Churchill, and more…

Movies:

- Cecil B. DeMille's The Ten Commandments
- Safety Last! starring Harold Lloyd
- Charlie Chaplin's The Pilgrim
- Buster Keaton's Our Hospitality
- Felix the Cat
- And many more…

Music:

- "Louisville Lou" by Jack Yellen & Milton Ager

- “Charleston” by Cecil Mack & James P. Johnson
- “It Ain’t Gonna Rain No Mo” by Wendell Hall
- “Down Hearted Blues” by Bessie Smith
- And many more…

Humor-or something similar…


1245
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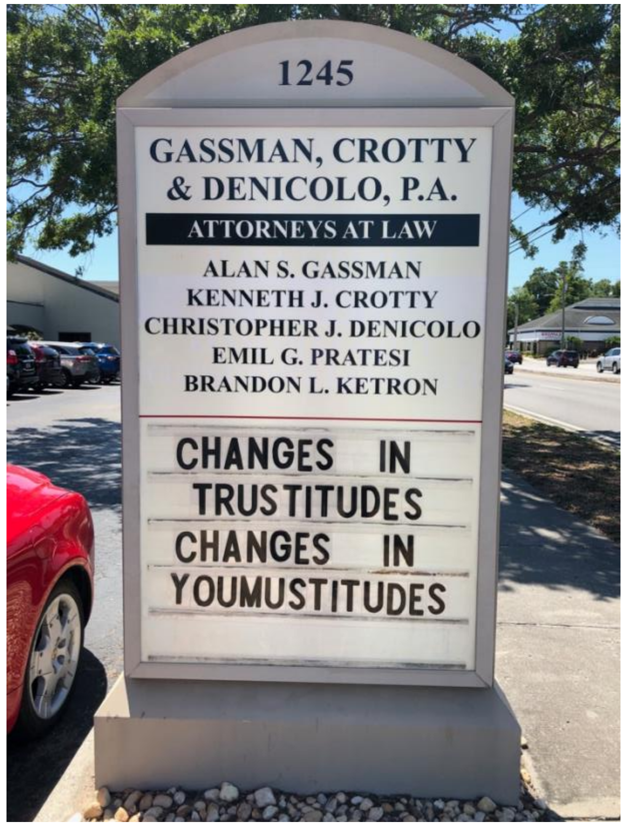
BRANDON L. KETRON
TO ERR IS
HUMAN
TO FORGIVE IS
DISIGN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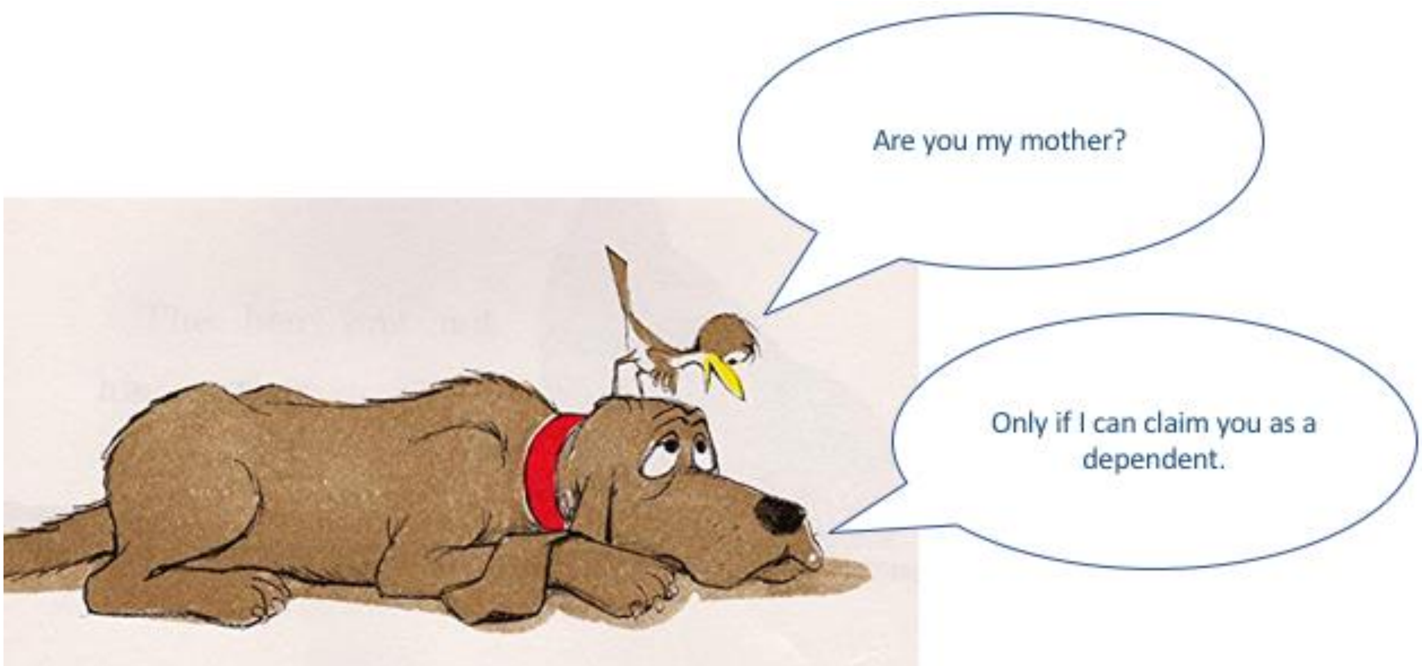
CHANGES IN
TRUSTITUDES
CHANGES IN
YOUMUSTITUDES


Are you my mother?
Only if I can claim you as a dependent.

Mother’s Day Jokes

- **Adam was the luckiest man in the world. He had no mother-in-law. (Mark Twain)**

• The mother-in-law came round last week. It was absolutely pouring down. So I opened the door and I saw her there and I said, 'Mother, don't just stand there in the rain. Go home.’ (Les Dawson)

• Behind every successful man is a proud wife and a surprised mother-in-law. (Hubert Humphrey)

• Give up all hope of peace so long as your mother-in-law is alive. (Juvenal)

• On Valentine's Day, I wired flowers for my mother-in-law, but she found the fuse. (Milton Berle)

• I can always tell when the mother in law's coming to stay; the mice throw themselves on the traps. (Les Dawson)

• My mother in law fell down a wishing well. I was amazed; I never knew they worked. (Les Lawson)

• Last week my wife and I went to buy a car and the salesman asked if I wanted an airbag. I said: “No thanks. I already have a mother-in-law.”

• A man, his wife and his mother-in-law went on vacation to the Holy Land. While they were there, the mother-in-law passed away. The undertaker told them, ‘You can have her shipped home for $5,000, or you can bury her here in the Holy Land for $150. ‘The man thought about it and told him he would just have her shipped home. The undertaker asked, ‘Why would you spend $5,000 to ship your mother-in-law home, when it would be wonderful to have her buried here and spend only $150?’ The man replied, ‘a man died here 2,000 years ago, was buried here, and three days later he rose from the dead. I just can’t take that chance.’

Calendar of Events

Newly announced events in RED

EVENT	DATE/TIME	DESC.	REGISTRATION
FSU FICPA Accounting Conference	May 6 – 8, 2019, Tallahassee, FL	Alan will be speaking on the new 199A finalized regulations	Contact: Agassman@gassmanpa.com
Tampa General Hospital Lecture Series	May 10, 2019	Contract Negotiations	Contact: Agassman@gassmanpa.com
FICPA Mega CPE Conference for the TCJA	June 10 – 13, 2019	Alan will be speaking on the new 199A finalized regulations	Contact: Agassman@gassmanpa.com
MER Conference Internal Medicine for Primary Care	June 13 – 16, 2019, Chicago, IL	1. Lawsuits 101 2. Ten Biggest Mistakes That Physicians Make in Their Investment and Business Planning 3. Essential Creditor Protection & Retirement Planning Considerations. 4. 50 Ways to Leave Your Overhead & Increase Personal Productivity.	Contact: Agassman@gassmanpa.com
Maui Mastermind Wealth Summit Bonus Webinar	June 20, 2019. 3:00 PM	Legal Protection Package: Nuts and Bolts of Estate Planning, Personal Creditor and Estate Tax	Please Click HERE
Maui Mastermind Financial Pillar Super Course	June 22-23, 2019	Hilton-Atlanta Airport Crucial Legal and Tax Principals for Accumulating Wealth	Please Click HERE

45th Annual Notre Dame Tax Institute	September 26-27, 2019	South Bend, Indiana	Alan's topic will be, "Application of Section 199A and its interaction with other Prominent Tax Laws to Real Estate Investors, Developers and Others"	Contact: Agassman@gassmanpa.com
FICPA Accounting and Tax Conference	October 24, 2019	Estero, FL	TBD	Contact: Agassman@gassmanpa.com
Special Asset Protection Presentation	Friday, October 25, 2019	University of Miami Law School	Advanced Asset Protection Workshop with Les Share	Contact: Agassman@gassmanpa.com
2019 Maui Mastermind Wealth Summit	November 10 – 15, 2019	The Fairmont Orchid, Big Island of Hawaii	Alan's topics will include: (1) The Magical and Mystical Aspects of Tax Planning for the Successful Entrepreneur, and (2) Estate Planning Meets Creditor Protection Planning - Making Sure That You Have Covered the Bases.	Please Click HERE
Mote Vascular Foundation Symposium	December 7, 2019	TBD	Estate, Medical Practice, Retirement, Tax, Insurance, and Buy/Sell Planning – The Earlier You Start the Sooner You Will Be Secure	Contact: Agassman@gassmanpa.com
Certified Contractors Network Presentation	January 4, 2020 - Orlando	Orlando, FL	Creditor Protection for the Intelligent Construction Family – It	Contact: Agassman@gassmanpa.com

			Wasn't Raining When Noah Built the Ark	
Venice Estate Planning Council Presentation Hosted by Community Foundation of Sarasota County	Tuesday, January 21, 2020, Venice then Sarasota, FL	For the Venice Estate Planning Council and Sponsored by the Community Foundation of Sarasota County, Alan will be conducting a morning presentation, "Innovative Charitable Techniques, Asset Protection Strategies You Didn't Know and Creative Planning Under Section 199A" He will be answering questions (and telling many bad jokes) for VIPS at the hosted luncheon and will be the dinner speaker to finish the event off. Starting in Venice, these events will conclude in Sarasota.		Contact: Barbie Gonzalez: BGonzalez@CFSarasota.org