



Issue #278 - Thursday, November 28, 2019

Edited by: Alan Gassman

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**Gassman, Crotty & Denicolo, P.A. is
Clothes(ed) for Thanksgiving**

The weather in Florida has seen quite the shift over the last couple weeks while our northern neighbors may call it "old hat." Many charities provide meals around this time of year which provide temporary comfort to the less fortunate, though quality garments in great condition can provide comfort through many harsh nights. Consider making a clothing donation to a local or national charity. Websites like WWW.CharityNavigator.ORG provide a great resource to investigate a 501(c)(3) reputation based on their financial filings. Though financial documents may not tell the whole story. Criticisms of charity CEO salaries have always existed, but imagine attracting quality talent in a world of head hunters lead by Amazonians and Googlers; that may shine a new light.

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Quotes

By: Leslie Nielsen

Nielsen plays Dr Rumack, who is aboard an aeroplane, many of whose passengers have suddenly fallen ill.

- Rumack: “You’d better tell the captain we’ve got to land as soon as we can. This woman has to be gotten to a hospital.”
- Air stewardess: “A hospital? What is it?”
- Rumack: “It’s a big building with patients, but that’s not important right now.”

From Airplane!, 1980

- Rumack: “Can you fly this plane, and land it?”
- Ted Striker [a qualified pilot who hasn’t flown in years]: “Surely you can’t be serious.”
- Rumack: “I am serious. And don’t call me Shirley.”

From Airplane!, 1980

Nielsen plays Frank Drebin, a hapless (but invariably successful) cop.

- Mrs Twice [a grieving widow]: “Please go away. I don’t want to answer any more of your questions.”
- Drebin: “We’re sorry to bother you at a time like this, Mrs Twice. We would have come earlier, but your husband wasn’t dead then.”

From Police Squad!, 1982

Drebin has gone undercover as a locksmith to investigate a gang of blackmailers. He breaks into the lair of the gang’s boss.

- Boss: “Who are you, and how did you get in here?”

- Drebin: “I’m a locksmith. And I’m a locksmith.”

From Police Squad!, 1982

Section 199A Trade Or Business Guidelines For Rental Property

Many landlords can take the Section 199A 20% deduction if they are an active trade or business.

An active trade or business will be considered to exist if the leases are not triple net and are owned by one entity that has at least 250 hours a year spent on certain specified activities.

Our rewrite of these rules, to take into account an IRS pronouncement dated September 24, 2019 are as follows:

Along with the new Final Regulations, the IRS also released a special notice (Notice 2019-7) to provide “notice of a proposed revenue procedure detailing a proposed safe harbor under which a rental real estate enterprise may be treated as a trade or business solely for the purpose of Section 199A.” The Proposed Revenue Procedure was subsequently finalized as Revenue Procedure 2019-38 and retained most of the requirements contained in the original Notice.

Under the new safe harbor, rental real estate may be treated as a trade or business for the purposes of Section 199A alone as long as the following criteria are met:

1. Separate books and records are maintained for each rental activity (or the combined enterprise if grouped together);).
2. Two hundred and fifty (250) hours or more of “rental services” are performed per year for the activity (or combined enterprise); ~~and~~, or if the activity has been in existence at least four years then the 250 hour requirement has been satisfied in at least three of the last five years.
3. The taxpayer maintains contemporaneous records, including time reports or similar documents, regarding the hours of all services performed, a description of all services performed, the dates on which such services are performed, and who performed the services. This recordkeeping requirement can be met with respect to services performed by employees or independent contractors of the taxpayer by having a description of the applicable services provided by the employee or contractor, along with the amount of time generally spent performing such services, and the time, wage or payment records for the employee or contractor.
4. The taxpayer includes a statement on the return, **under penalties of perjury**, that the taxpayer satisfies the above requirements of the safe harbor.

To this end, taxpayers should consider the following:

1. Be certain to maintain separate books and records. If the taxpayer uses Quicken or a similar program to track records, he/she may want to set up a new account for this.
2. If the taxpayer has commingled rental income and expenses in his/her personal checking

account, then set up a new separate account for the business.

3. If the taxpayer has used one account for all rental properties then, unfortunately, separate bank accounts should be created.

4. The taxpayer should maintain a calendar and also a supporting file of saved emails, internet research, photos saved with date/time stamp, etc. to show ongoing involvement and corroborate that actions were taken supporting the hours tracked.

It is noteworthy that the recordkeeping requirement only applies for taxable years beginning after January 1, 2019. As a result, taxpayers relying upon the safe harbor for the 2018 tax year do not have to provide records of time spent on the real estate activities.^[2]

~~HRS Notice~~Revenue Procedure 2019-738 provides that real estate rented or leased under a triple net lease is not eligible under the safe harbor, even though a taxpayer who has an active business of entering into and selling triple net leases may still be considered to be sufficiently active to qualify as a trade or business under the case law.

~~For the purposes of the Section 199A deduction~~Under Notice 2019-7, a triple net lease ~~is~~was defined very broadly to include leases that would not typically be called “triple net” by landlords and tenants. In a normal triple net lease, the tenant pays all of the taxes, maintenance and insurance, although there are many types of “triple net leases,” including an absolute triple net lease, an absolute net lease, a fully net lease, and others.^[3] The Notice would ~~require~~have required that any lease where a tenant pays any portion of the taxes, maintenance and insurance be a triple net lease, based upon the following language from the Proposed Revenue Procedure: “a triple net lease includes a lease agreement that requires the tenant or lessee to pay taxes, fees, and insurance, and to be responsible for maintenance activities for a property in addition to rent and utilities.”^[4]

The definition ~~seems~~seemed to leave open the ability to avoid triple net lease status by having a tenant be responsible for some portion of the maintenance, taxes, fees, insurances and other expenses that would normally be payable by a landlord~~;~~, but this was not entirely clear.

In the June 27, 2019 commentary letter to Notice 2019-7, sent by the Tax Section of the ABA, this is described as follows:

For purposes of the Proposed Revenue Procedure, a ‘triple net lease’ **includes** a lease agreement that requires the tenant or lessee to pay taxes, fees, and insurance, and to be responsible for maintenance activities for a property in addition to rent and utilities, or a lease agreement that requires the tenant or lessee to pay a portion of the taxes, fees, and insurance, and to be responsible for maintenance activities allocable to the portion of the property rented by the tenant.

The ABA appropriately points out that in order to have a triple net lease, the tenant should be required to pay *all* taxes, operating expenses, maintenance and insurance, as opposed to having some portion of what the total obligation would normally be under a true triple net lease.

The Tax Section letter indicates that a triple net lease may include a situation where the landlord only has to repair and replace foundations and exterior walls and roofs, if the tenant is responsible for all other normal triple net lease expenses, which appears to be a very reasonable concession.

Fortunately, Revenue Procedure 2019-38 defines a triple net lease as a lease that requires the tenant to

pay taxes, fees, and insurance, and to pay for maintenance activities for a property in addition to rent and utilities. Therefore, a lease will not be considered to be “triple net,” if the tenant makes a significant contribution towards taxes, fees, insurance or maintenance.

As the result of this situation, many landlords will be well advised to ~~offer significant rent reductions to tenants who are willing to pay for some part of one or more items,~~renegotiate lease agreements so that the landlord is providing significant services, and the tenant is paying a material portion of the taxes, insurances or maintenance, even if rent is reduced by more than the estimated out-of-pocket costs that the tenant will have as the result of the adjustment, so that the landlord can fit within the safe harbor, or have a better chance of succeeding in showing the IRS that the landlord is an “active trade or business” in order to reduce the effective tax rate on taxable income from 37% to 29.6%, in addition to whatever may be saved in state income taxes and state sales taxes as a result of such adjustments. The safe harbor cannot be used by taxpayers who rent their personal residences out for part of the year (e.g. Airbnb or VRBO rentals).

The safe harbor requires that any entity must own the real estate directly or through another disregarded entity (such as a single member LLC).

Additionally, for the years 2018 through 2022, 250 or more hours of rental services must be performed to qualify a property for the safe harbor in a calendar year. This includes time spent by owners, employees, agents and independent contractors as owners, which can include management and maintenance companies who have personnel who keep and provide such contemporaneous records. However, time spent by computers that have artificial intelligence will not apply.

Negotiating and executing leases, advertisement to rental lease properties, and verifying information contained in tenant applications will be included in the definition of rental services, as will collecting rent and supervising employees and independent contractors. Rental services do not include time spent on items that would typically be handled by a consultant with an MBA or similar degree rather than by a real estate developer, such as financial or investment management activities, arranging financing, studying or reviewing financial statements or reports on operations, or planning, managing, or constructing long-term capital improvements to properties.

Rev. Proc. 2019-38 generally maintains the same lists of activities that will and will not count towards the 250 hours.

The only significant change was that the reference to time spent planning, managing or constructing long-term capital improvements now refers to time spent improving property under Treasury Regulations Section 1.263(a)-3(d), which does not count towards the 250-hour requirement. Treas. Regulations Section 1.263(a)-3(d) provides 68 examples as to what is and what is not considered “improving property” and provides much better guidance for taxpayers.

The specific items that are counted towards time spent, which may be performed by owners or employees, agents or independent contractors of the owners, are:

- (i) advertising to rent or lease the real estate;
- (ii) negotiating and executing leases;
- (iii) verifying information contained in prospective tenant applications;

(iv) collection of rent;

(v) daily operation, maintenance, and repair of the property, including the purchase of materials and supplies;

(vi) management of the real estate; and

(vii) supervision of employees and independent contractors.

The specific items that are not counted towards time spent are:

(i) financial or investment management activities, such as arranging financing;

(ii) procuring property;

(iii) studying and reviewing financial statements or reports on operations;

(iv) improving property under Treas. Regs. Section 1.263(a)-3(d); and

(v) traveling to and from the real estate.

Each individual taxpayer, estate or trust can elect to treat each separate property as a separate enterprise, or all similar properties as a single enterprise, for the purposes of applying safe harbor rules, except that commercial and residential real estate cannot be considered as part of the same enterprise and triple net real estate cannot be part of a combined enterprise for testing purposes because they “are not eligible for the safe harbor.”

Further, separate books and records must be maintained to reflect the income and expenses for each property, and contemporaneous records must be created which include time reports, logs or similar documents which will report the hours of all services performed, the description of all services performed, the dates on which such services are performed and who performed such services.

Although the safe harbor ~~Surprisingly, the Notice specifically excludes triple net leases as ineligible for the safe harbor!~~ This, this does not prevent the taxpayer from arguing that the real estate enterprise should qualify as a trade or business under the Section 162 definition if there are other considerations at

play.^[5] Although it is important to remember that both the Final Regulations and relevant case law say that qualifying under Section 199A involves a factual case-by-case analysis, triple net lease arrangements will most likely need to be altered in order to qualify.^[6] Practitioners should consider the structure of the ownership of the triple net leased properties and the aggregation rules. It may be possible to alter the structure, e.g. have all separate non-qualifying LLCs restructured into disregarded entities so that they can be aggregated for this test.

^[1] Toni Nitti, *supra*.

^[2] Internal Revenue Service Notice 2019-7.

^[3] *Brenner v. Amerisure Mut. Ins. Co.*, 893 N.W.2d 193 (Wis. 2017).

[4] Internal Revenue Service Notice 2019-7.

[5] Id.

[6] The specific requirements for this safe harbor are discussed further in the article: “One Particular Harbor: New Regulatory Guidance on If and When a Rental Real Estate Activity Can Qualify for the 20% Section 199A Deduction.” LISI Income Tax Planning Newsletter #170 (January 21, 2019) at <http://www.leimbergservices.com>.

Recent Additions To An Asset Protection Outline



Alan Gassman and Marty Shenkman have been working on an outline that may become a book on Practical Planing with Asset Protection Trusts.

Some excerpts from the outline are as follows:

- A number of items for discussion with a client who is particularly interested in or in need of asset protection services will include the following:
 - A survey of what assets are exempt from creditor claims and what assets are not, along with the practical implications associated therewith.
 - A discussion of how assets should be owned as between a married couple and their family members, where one spouse is at high risk because of professional, business, or loan situations, so that the other spouse would be the logical majority or sole owner of family assets. There could be important repercussions if the couple ever divorces, so the law in the lawyer or advisor’s state of residence and possible interaction with a family lawyer may be necessary.
 - Couples who reside in community property states should be apprised of the ability of a creditor of one spouse to reach all community property, and the advantages and disadvantages of transmuting from community property status to separate asset status.
 - It is often best to have each spouse retain separate independent legal counsel. That way a spouse’s communications with lawyers and other professionals may be privileged if the spouse and the spouse’s legal team did not take any actions relating to the transfer of assets to avoid creditors. See SLAT discussion at Section 1.h.v.3.
 - Consider a Marital Asset Preservation System (“MAPS”) arrangement where a married couple may not believe that a DAPT will be needed until after one of them dies, such as if they live in a tenancy by the entireties jurisdiction, like Florida, and only one spouse is at high risk. The surviving spouse can be required by agreement to fund an asset protection trust (“APT”) to protect the inheritance of the children of the marriage, so that the funding of the APT has a significant business and family purpose.
 - While clients are accustomed to emails and texts which have blatant statements such as “Will this definitely protect my assets if xyz ever decides to come after

me?,” _____ do not play well in situations where creditors or a trustee in bankruptcy or a judge reviewing documents in camera would see these, or in situations where the client may want to give up attorney/client privilege to show that nothing was being hidden or done clandestinely. It is much more difficult to adequately represent an individual without putting certain things in writing, but this will often be necessary.

- Where entities exist that have valuable assets or operations and no debt encumbering these, the client can be well advised to put friendly debt in place
- Costs associated with owning and maintaining life insurance, annuity, offshore investment accounts, and other investment products and services should be discussed when evaluating strategies and implementation. Most variable annuity owners do not realize the costs imposed by the insurance company, and the large commissions paid to sales agents which, indirectly, can distort the judgment of a commissioned advisor, and causes the cost to be significant. Clients have the choice of working with fee-for-service or less expensive advisors, and purchasing annuity and life products on a non-commissioned much lower cost basis. What is the ethical duty of a lawyer or other advisor who does not disclose this to a client who spends much more than what he or she expected or knew about for the purpose of protecting assets?
- Protection from theft is another topic that should be covered whenever a client will be entrusting assets to an individual or company. While U.S. banks and mutual fund companies are safe because of FDIC, SPIC and brokerage platform insurances, private investment funds and offshore banks can become insolvent and unable or unwilling to return monies to an investor. The same issues can occur with an offshore private placement life insurance or annuity policy. Offshore trust, life insurance and annuity based accounts can be established with reputable brokerage firms and banks with multiple signatures to be required before any significant withdrawal can occur.
- FDIC coverages and CEDARS. When the economy gets shaky, clients will ask why bank accounts are not protected from bank failure due to FDIC limitations.
- For example, if the client is a professional such as a doctor, lawyer, CPA or architect, then his or her wages may be protected from creditors if he or she is the “head of household,” and thus provides more than 50% of the support of the professional and one or more relatives, or a significant other. Wages that are exempt from creditor claims may be deposited into other creditor exempt assets, and the professional may wish to spend down unprotected assets in the normal course of living, while banking the paycheck and earnings from exempt assets that may be purchased with the paycheck.
- Many states offer very few creditor exempt assets, or limit the value that can be protected to very small amounts. Individuals who reside in these states need to understand the risk of doing so, and may consider use of limited partnerships and limited liability companies, which may limit a creditor to receiving a charging order, asset protection trusts that may stop a creditor completely, life insurance and annuity contracts in offshore jurisdictions which may offer income tax savings, death benefits and a reasonable degree of financial security.
- Domestic asset protection trusts that would benefit a settlor may follow one of the following arrangements:
 - The client and others are mentioned as discretionary beneficiaries of the trust, with the trustee having the ability to distribute all assets to the settlor.
 - The settlor is not a beneficiary of the trust unless or until Trust Protectors, who may or may not be acting in a fiduciary capacity, would add the grantor as a beneficiary.
 - The grantor cannot be added as a beneficiary until an event of independent significance occurs, such as if and when the grantor does not have assets or income sufficient to support himself or herself, after taking into account the ownership of assets that are immune from creditors. Please note that this type of trust may be

immune from creditor claims in a non-DAPT jurisdiction where the most that a creditor can reach is the highest amount that a trustee is able to distribute by the terms of the trust agreement.

Breast Cancer: Financial And Estate Planning Check-Up

By: Martin Shenkman



A diagnosis of breast cancer will affect every aspect of your life, not just health issues. It will affect finances, life expectancy, insurance coverage, and estate planning steps. While comprehensive proactive planning to address some of these issues before a specific diagnosis is received would be ideal, the reality is that too few consumers address these matters until the reality of cancer occurs.

Start by asking questions

After diagnosis, your focus appropriately will be on determining a course of medical treatment with your oncologist. However, you really need to consider a myriad of other issues. The emotional impact may be dramatic and may make it difficult for you to consider, let alone actually address, other types of planning. But you should. This is particularly problematic because the most important time for you to address financial, estate and other planning may be soon after you are diagnosed. Later, there may not be energy or time for those planning steps. Will your health insurance cover most or only some of the treatment costs? Who will assist you with all of the paperwork, forms, and insurance documentation? Can you afford a care manager to assist you? Will your spouse, partner or other family caregiver be willing to permit a care manager to assist, or will she view it as his responsibility or domain to handle these matters? [Continue reading on Forbes.](#)

Thank You Larry



We thank IRS tax controversy lawyer Larry Heinkel for his recent additions to our book entitled *What Estate Planners (And Others) Need To Know About Bankruptcy* [available on Amazon](#). "hint hint - a great holiday gift for any and all estate planners who you love." The first three people who send us an email about this will receive the redlined version to show what Larry has added to the book regarding

"when the IRS is a creditor."

Larry also wrote the following article:

[*Avoid the Temptation of Tax Evasion*](#)

[We thought this may be of interest, click here to read it on his blog](#)

For Finkel's Followers

These 3 Things Will Help Take Your Business To The Next Level

By: David Finkel



What do you do when you don't know all the answers?

As a business owner, it's easy to get stuck in a rut. You have employees and customers that are relying on you to know the answers and do the right thing, and sometimes those answers don't come easy. You don't know everything and at times you may be [stressed](#) and [anxious](#) thinking about what the future may hold for your business. And you are not alone in your thinking. Hundreds of thousands of small to medium business owners feel the same way. But a growing percentage of business owners see the value in reaching out to a peer group and mentor.

Here are my three tips to help grow your business and change the way you think about things.

1. **Build your own business owner mastermind group.** A mastermind group is a group of two or more individuals who work together to help each of the members reach their respective top goals in a spirit of harmony and cooperation. I've been in a mastermind group for a decade now where I meet with my mastermind partners bi-weekly via phone and once or twice a year in person. They have been an incredible sounding board of experienced business owners who know me, my company, and my goals, and yet have the emotional distance to challenge my thinking.
2. **Participate in a structured business coaching program.** You'll both be able to use your coaches outside perspective to help you sharpen your thinking, and to leverage the structured strategic process of a business coaching program itself. For example, we meet with each of our [business coaching](#) clients quarterly to guide them through a proven strategic planning retreat. To be successful in a coaching program you will need both the one-to-one interchange and dialogue with your coach and a pre-set structured strategic process to make sure you intentionally and intelligently make your decisions about where to focus your company time, talent, attention, and money.

3. **Build a management team that sees the world differently from you.** While it is a tough thing to find people who are willing to challenge the person who signs their paycheck, it is an essential ingredient if you truly want to scale your company. You need leaders who give fresh perspective and are willing to push you to rethink your underlying models and assumptions. As you build your management team, make this one of your key criteria of senior level hires--people who will speak their mind, ask the tough questions, and face the hard facts, but who are willing to fully get behind the decisions your company later makes on these tough calls.

Imagine what this would mean for your own business. To have not one, not two...but an entire network of people to turn to when you have questions about a particular business decision or problem. Suddenly problems that seemed unsurmountable are now manageable and easy to navigate. And your barriers to growth? Non-existent. So, the next time you find yourself in a rut, reach out to a mastermind group, a coach or your own executive team for a fresh perspective on the situation.

On This Day In History

Birthdays

- Berry Gordy, Jr., founder of the record label Motown Records, was born on this day in 1929.
- Actor Ed Harris was born on November 28, 1950. Harris is best known for his rolls in *Apollo 13* and *The Truman Show*.
- Jon Stewart, the once host of *The Daily Show* on Comedy Central, was born on this day in 1962.
- NASCAR driver Chase Elliot also shares this birthday. He was born in 1995.
- Helen Magill White was born on November 28, 1853. She holds the distinction of being the first woman awarded a Ph.D. in the United States.
- Anna Nicole Smith was born on this day in 1967.

On This Day

- 1582 - William Shakespeare and Anne Hathaway get their marriage license for £40.
- November 28th is a big day for independence:
 - 1912 - Albania declares independence from the Ottoman Empire
 - 1975 - East Timor declares its independence from Portugal
 - 1960 - Mauritania becomes independent from France
 - 1958 - Chad, the Republic of the Congo, and Gabon all become autonomous republics
 - 1991 - South Ossetia declares its independence from the country of Georgia
- November 28th is National French Toast Day
- There is a town in Argentina named *28 de Noviembre (Veintiocho de Noviembre)* that was founded on November 28, 1959. The town has roughly 5,300 inhabitants and mainly exists as a coal mining town.
- On this day in 1990, Margaret Thatcher resigned as British Prime Minister, passing the reigns to John Major.
- The first automobile race held in the United States was hosted on November 28, 1895. The race was traveling from Chicago, Illinois to Evanston, Illinois in the quickest time possible. The race was completed in just over 10 hours in Frank Duryea's wagon. Frank Duryea, along with his brother Charles, founded Duryea Motor Wagon Company and created the first gasoline-powered automobile.
- November 28, 1893 marked the first time women could vote in New Zealand following years of

effort from women's suffrage campaigns.

What I Learned This Week In Law School

By: Wesley Dickson, Stetson University College of Law 3L

Decanting

Today in law school I learned about decanting. Decanting a trust is a lot like decanting a bottle of fine wine, except instead of wine being poured into another container, assets from a trust are moved into a different trust. There are many reasons for doing this, but most of these reasons boil down to this: the new trust can have different terms and rules from the old. Currently, decanting trusts can be done in over 25 states, with more joining the list every year.

One interesting thing I learned about decanting is that the trustee, not the trust's grantor, must be the one to begin the transfer of assets. This, I'd imagine, is because the trustee, unlike the grantor, holds a fiduciary duty to the beneficiaries.

In order to ensure the decanting will be successful, it is important to look at the laws from each state. New York's decanting law, for example, explicitly does not allow the language of the new trust to eliminate the withdrawal rights of beneficiaries that were allowed in the old trust while Florida's law is silent on this issue.

Interestingly, Florida is often cited as the birthplace of trust decanting. In the 1940 case *Phipps v. Palm Beach Trust Company*, the Florida Supreme Court ruled that a trustee had the ability to make an outright distribution to a beneficiary. This has been interpreted to implicitly give trustees the power to make a similar distribution into a separate trust.

Decanting, based on what I learned in law school, seems like an incredibly powerful tool. The ability to change irrevocable trust language changes the landscape of estate planning greatly. It will be interesting to see whether the other states will soon adopt similar statutes, or if the federal government might pass binding national legislation.

Humor



Humor

By: Wesley Dickson

- Meghan Trainor recently stated in an interview that the best part of her year is preparing the Thanksgiving Turkey. When asked why this was her favorite activity she replied, “You know I’m all about that baste, about that baste...”
- I used to leave my turkey in the fridge before serving it, but my family would always get mad at me. Then suddenly, one year I served it warm and from that point on, I haven’t gone back. I quit cold turkey cold turkey.
- If April Showers bring May Flowers, what do May Flowers bring? Pilgrims
- My daughter was asked to draw a turkey for school. She was allowed to trace, but had no idea where to start so I gave her a hand.
- Thanksgiving is a holiday designed for eating. It’s no coincidence that Turkey’s flag looks like Pac-Man getting ready to take a big ol’ bite out of a star.
- When people used to say they “hated Turkey” I used to wonder whether they meant the bird or the country. Now I think of the bird, but back then I Erdoğan the side of caution.

Upcoming Events

Recent Updates

[Register for the full complimentary Learning at Lunch webinar series](#)

Date	Event	Details	Information
11/20/2019	Leimberg Webinar Services (LISI)	Alan Gassman and Christopher Denicolo present: <i>Estate and Trust Planning with S Corporations After TRA 2017 - And Recent Developments</i> from 3 PM to 4:30 PM ET	<u>REGISTER HERE</u>
11/21/2019	Learning at Lunch Webinar Series	Alan Gassman presents: <i>Planning for Florida Dental Practices and Their Owners</i> from 12:30 PM to 1 PM ET	<u>REGISTER HERE</u>
11/21/2019	Leimberg Webinar Services (LISI)	Alan Gassman and John Beck present: <i>Economic Opportunity Zones: Strategies For Your Clients</i> from 1 PM to 2:30 PM ET	<u>REGISTER HERE</u>
11/21/2019	Leimberg Webinar Services (LISI)	Alan Gassman, Ken Crotty and Christopher Denicolo present: <i>Dynamic Planning with Irrevocable Trusts After TRA 2017</i> from 3 PM to 4:30 PM ET	<u>REGISTER HERE</u>
11/22/2019	Leimberg Webinar Services (LISI)	Alan Gassman presents: <i>Planning With APT's After Rensin and Cleopatra, and Other Planning Opportunities and Developments--Let My Assets Go!</i> from 3 PM to 4:30 PM ET	<u>REGISTER HERE</u>
12/5/2019	Learning at Lunch Webinar Series	Barry Flagg presents: <i>What To Ask For To be Able to Actually "Read" A Life Insurance Illustration?</i> from 12:30 PM to 1 PM ET	<u>REGISTER HERE</u>

		(Moderated by Alan Gassman)	
12/7/2019	Mote Vascular Foundation Symposium	Alan Gassman presents: <i>Estate, Medical Practice, Retirement, Tax, Insurance, and Buy/Sell Planning – The Earlier You Start the Sooner You Will Be Secure</i> from 10:20 AM to 11:50 AM ET	Please consider attending to support this great event
12/12/2019	Learning at Lunch Webinar Series	Barry Flagg presents: <i>Indexed Universal Life – Who Says Hedge Funds Are Only For the Rich?</i> from 12:30 PM to 1 PM ET (Moderated by Alan Gassman)	REGISTER HERE
12/19/2019	Learning at Lunch Webinar Series	Alan Gassman presents: <i>Success Tips for First Year Lawyers (and all other professionals) - Part 1</i> from 12:30 PM to 1 PM ET	REGISTER HERE
12/26/2019	Learning at Lunch Webinar Series	Alan Gassman presents: <i>Success Tips for First Year Lawyers (and all other professionals) - Part 2</i> from 12:30 PM to 1 PM ET	REGISTER HERE
1/9/2020	Learning at Lunch Webinar Series	David Finkel presents: <i>The Ten Must-Follow Rules to Leverage Your Personal Assistant to Make Your Life More Fun, Profitable, and Enjoyable</i> from 12:30 PM to 1 PM ET (Moderated by Alan Gassman)	REGISTER HERE
1/15/2020	Heckerling Institute on Estate Planning in Orlando, FL	Alan Gassman will be at the <i>Interactive Legal</i> booth #436 beginning at 3:40 PM ET	REGISTER HERE
1/16/2020	Learning at Lunch Webinar Series	David Howell, Larry Rybka and Tom Love present: <i>How to Retire in the Magical Retirement Income Castle in the Clouds</i> from 12:30 PM to 1 PM ET (Moderated by	REGISTER HERE

		Alan Gassman)	
1/21/2020	Community Foundation of Sarasota County - Distinguished Speaker Series	Alan Gassman presents: <i>Creditor and Trust Planning Strategies You May Not Know About</i>	REGISTER HERE
1/23/2020	Learning at Lunch Webinar Series	Christopher Denicolo presents: <i>Explaining the Installment Sale to a Defective Trust</i> from 12:30 PM to 1 PM ET (Moderated by Alan Gassman)	REGISTER HERE
1/30/2020	Learning at Lunch Webinar Series	Alan Gassman presents: <i>The Biggest Mistakes Physicians Make As Owners and Non-Owners in Medical Practices</i> from 12:30 PM to 1 PM ET	REGISTER HERE
1/31/2020	ABA Tax Section Meeting in Boca Raton, FL	Alan Gassman participates in a panel discussion: <i>TCJA - Hot Topics for Closely Held Businesses</i> from 2:30 to 3:30 PM ET	More information available soon
2/6/2020	John Hopkins All Children's 22nd Annual Estate, Tax, Legal & Financial Planning Seminar at multiple viewing locations across Florida	Please consider attending to support this great event	REGISTER HERE
2/6/2020	Learning at Lunch Webinar Series	John Beck presents: <i>Don't Be Passive: Passive Rental Losses</i> from 12:30 PM to 1 PM ET (Moderated by Alan Gassman)	REGISTER HERE
2/12/2020 through 2/14/2020	The Florida Tax Institute at Marriott Waterside Tampa in Tampa, FL	Please visit our display table in the Exhibit Hall for a free book	REGISTER HERE
2/13/2020	Learning at Lunch Webinar Series	Alan Gassman presents: <i>Planning for Florida Dental Practices and Their Owners - Part 2</i> from 12:30 PM to 1 PM ET	REGISTER HERE

2/14/2020	LawEasy Webinar	Alan Gassman and Martin Shenkman present: Asset Protection for Physicians - Part 1	More information available soon
2/21/2020	LawEasy Webinar	Alan Gassman and Martin Shenkman present: Asset Protection for Physicians - Part 2	More information available soon
5/1/2020	USF Resident Intern meeting at Tampa General Hospital in Tampa, FL	Alan Gassman presents: <i>Contract Negotiations</i> from 4 PM to 5 PM ET	MORE INFORMATION
5/2/2020	Reno Estate Planning Council in Reno, NV	A morning or afternoon with Alan Gassman: <i>4 Hours To Spur Wild West Planners Into Action!</i>	More information available soon
5/15/2020	USF Resident Intern meeting at Tampa General Hospital in Tampa, FL	Alan Gassman presents: <i>Contract Negotiations</i> from 4 PM to 5 PM ET	MORE INFORMATION
5/29/2020	USF Resident Intern meeting at Tampa General Hospital in Tampa, FL	Alan Gassman presents: <i>Contract Negotiations</i> from 4 PM to 5 PM ET	MORE INFORMATION
6/5/2020	USF Resident Intern meeting at Tampa General Hospital in Tampa, FL	Alan Gassman presents: <i>Contract Negotiations</i> from 4 PM to 5 PM ET	MORE INFORMATION
7/3/2020	Florida Bar Tax Section Workshop at Amelia Island, FL	Alan Gassman presents: <i>Tax Lawyer Professional Acceleration Workshop</i> from 8:30 AM to 12:30 PM ET	More information available soon
8/28/2020 through 8/30/2020	46th Annual Notre Dame Tax & Estate Planning Institute	Please consider attending to support this great event	Registration available soon
9/25/2020	Florida Bar Tax Section Fall Meeting	Fall CLE	Registration available soon

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

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Gassman, Crotty & Denicolo, P.A.

1245 Court Street

Clearwater, FL

[\(727\) 442-1200](tel:(727)442-1200)

Clearwater, FL 33756