

Overview Course Schedule

Wednesday, October 31, 2018

Presented by Mary B. Foster and Martin E. Verdick

8:30 am	Registration & Continental Breakfast
9:00 am	Overview and Statutory Requirements of Section 1031 I.R.C. <ul style="list-style-type: none">• The qualified purpose requirement: Dealer property, personal residences and vacation homes• The like-kind requirement: Real vs. personal• The exchange requirement• Same taxpayer requirement: Changing entities mid-exchange• Related party rules: Acquiring replacement property from or selling relinquished property to a related party
10:00 am	Break
10:15 am	Tax Consequences of Exchanges. <ul style="list-style-type: none">• Computing taxable gain: Boot and boot offset rules• Selling expenses: Deductible or not• Re-financing: Before and after exchanging The Forward Exchange <ul style="list-style-type: none">• Identification and receipt provisions: 45 day rule, disaster extensions• Safe harbors from constructive receipt: Qualified intermediaries, trusts and escrows• Protecting the exchange funds from loss
12:15 pm	Lunch (<i>provided</i>)
1:30 pm	Reverse and Improvement Exchanges <ul style="list-style-type: none">• Safe harbor reverse exchanges• Improvement exchanges, including non safe harbor improvement exchanges• Combination reverse and forward exchanges Seller Financing, Partnerships, Tenancies in Common and DSTs <ul style="list-style-type: none">• How to deal with installment notes in an exchange• Partnership dissolutions and formations• What is and is not a tenancy in common for Section 1031• Delaware Statutory Trusts as co-ownership structures
3:30 pm	Adjourn