

Overview Course Schedule

Wednesday, October 25, 2023

Presented by Mary B. Foster and Martin E. Verdick

9:00 am	Registration & Continental Breakfast
9:30 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
10:30 am	Break
10:45 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
12:45 pm	Lunch (<i>provided</i>)
2:00 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