

Estate Planning and New IRS Centralized Partnership Audit Rules: Impact on Trusts Holding Partnership Interest

Event
Stafford; Webcast
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The new partnership audit rules will have a significant impact on trusts holding partnership assets. Mark G. Kmiecik will be presenting this discussion to guide estate planning counsel and trust advisers on the impact of the new partnership audit rules on estates and trusts holding partnership interests. Other topics that will be addressed include:

- The potential tax impact of the new centralized partnership audit rules on family partnerships and trusts
- Family partnership eligibility for an election out of the centralized audit regime
- Elections and changes to partnership operating documents, including selection of a partnership representative, limiting the scope of the representative's authority and deciding whether to require pushouts of audit assessments as part of a revised partnership agreement
- Alternative strategies to minimize potential tax exposure under the new audit rules

PROFESSIONALS

Mark G. Kmiecik
Partner

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