Overview Course Schedule

Wednesday, October 23, 2024 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. 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. Computing taxable gain: Boot and boot offset rules Selling expenses: Deductible or not Re-financing: Before and after exchanging The Forward Exchange 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 (provided)
2:00 pm	 Reverse and Improvement Exchanges 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 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