

[Webinar: “Structuring Preferred Partnership Freezes in Estate Planning: Navigating the Chapter 14 Valuation Rules”.](#)

Live Broadcast on October 20, 2017

This webinar will provide estate planners, advisers and tax counsel with a comprehensive exploration into the planning and structuring challenges and tax benefits of “freeze partnerships” as a tool for inter-generational wealth transfer. The speaker will discuss how to determine when freeze partnerships are the optimal vehicle for preserving basis, how to draft the partnership agreement and operating documents to ensure optimal tax treatment, and how to navigate the complex rules of Internal Revenue Code Chapter 14.

This course is co-sponsored with Wolters Kluwer.

Key Topics to be discussed:

- Structuring preferred partnerships
- Freeze techniques and structures
- Gift tax issues to avoid at formation
- How not to run afoul of the valuation requirements in IRC 2701
- Avoiding gain at formation resulting from contribution of assets into the preferred partnership
- Utilizing preferred partnerships with trusts (GRATs, CLATs, QTIPs)

Date / Time: October 20, 2017

[Article: “Non-Charitable Purpose Trusts: Past, Present, and Future,” 51 Real Prop. & Est. L.J. 321 \(2016\)](#)

This interesting article is a good read for all trusts and estates would-be scholars, from law students to practicing attorneys, as it hits the heart of what’s a valid purpose trust.

[Taxnotes®: Statutory Clarity for Early Termination of NICRUTs and](#)

[NIMCRUTs](#)

In this report, Jerome Hesch, Stephen M. Breitstone, and David C. Jacobson discuss how to value interests in charitable remainder unitrusts upon an early termination, and they address the self-dealing considerations when there is an early termination.

[Portland Business Journal: Tax reform could lead to a huge commercial real estate crash](#)

Steve Breitstone has partnered with local tax experts all over the nation to speak out about certain of the GOP Blueprint proposals which he believes could be particularly devastating to real estate investment throughout the country. Steve has authored a number of opinion pieces on the immediate expensing provision in the Blueprint and the loss of the tax deduction on interest paid on debt to acquire real estate. Steve warns that the implementation of immediate expensing would serve up a severe double blow to real estate investors once their expensing is used up - creating another dangerous real estate bubble.

[Crain's Cleveland Business: Learn from our past mistakes to avoid the next real estate bubble](#)

Stephen M. Breitstone and Richard Brown of Integrity Group co-authored this opinion piece which was published on June 6, 2017.

<http://www.crainscleveland.com/article/20170606/BLOGS05/170609890/learn-from-our-past-mistakes-to-avoid-the-next-real-estate-bubble>

[Digital Article: Too Busy To Die](#)

Partner Avi Z. Kestenbaum is featured in the article below:

<http://insuranceneutralmagazine.com/article/too-busy-to-die-3291>

[Trusts & Estates: Preventing Morbid Litigation](#)

Amy F. Altman discusses why you should ask clients about their funeral arrangements.

For some, this topic may be overwhelming, morbid and an issue they would rather avoid. Not surprisingly, some clients may reason that the individual nominated as executor will also be responsible for the disposition of their remains. In some jurisdictions, the nominated executor may not be the one to control the disposition of remains. To find out more, read the full article.

[Trusts & Estates: Don't Be Afraid of Questions](#)

An article by Avi Z. Kestenbaum.

January 2017

[WSJ Podcast \(Audio\): Should Children Inherit Assets Jointly or Separately?](#)

Wall Street Journal's Veronica Dagher interviews Avi Kestenbaum to discuss how to best go about managing your children's inheritance, and whether they should receive assets jointly or separately.

<http://www.wsj.com/podcasts/should-children-inherit-assets-jointly-or-separately/92C0338F-5BB7-489F-8C7B-A289637A6DB2.html>

[Bloomberg BNA Tax Management Real Estate Journal: Something New in the Toolbox: The Installment Sale-Reacquisition Approach to Real Estate Development Projects](#)

In a fairly common fact pattern in the recent upward-trending real estate market, a taxpayer owns land or air rights that it wishes to develop into an income-producing asset. The taxpayer and a developer agree that the developer will acquire a portion of the taxpayer's land or air rights provided that the taxpayer winds up owning an income-producing real estate asset on the property that it retains. In effect, the developer will construct improvements for the taxpayer in exchange for part of the taxpayer's property.
