

insights

TYPES NOT MAPPED YET July 25, 2023 | TTR not mapped yet | Steve B. Gorin

Gift Tax Return Adequate Disclosure; Constructive Dividends; Transferee Liability

Webinar

Drawn from Steve Gorin's 2nd quarter 2023 newsletter, our presenter will cover important recent cases on how to satisfy the adequate disclosure requirements for gift tax returns, when transactions between shareholders and corporations constitute constructive dividends, and transferee liability for estate tax that may now be imposed on beneficiaries automatically when they receive a bequest.

Our presentation will provide clarification of standards for gift tax return adequate disclosure (case of first impression for Tax Court) and review how this informs return preparation and planning for defined value formula transactions.

Steve will provide analysis of cases on constructive dividends which include rental arrangements, reasonable compensation, and compensation for owner guarantees of corporation obligations.

Finally, Steve will review how transferee liability normally required a fraudulent (voidable) transfer under state law as well as a finding of federal liability, but a split decision of the Ninth Circuit ruled that no such finding is required regarding unpaid estate tax when distributions of bequeathed property are made to beneficiaries - no matter how far down the line they are. He will provide an overview of strategic implications if such a rule applies to your clients.

CLE

The live presentation of this webinar was approved for 1.5 hours of general CLE credit in California, Illinois, and Texas; 1.8 hours of general CLE credit in Missouri; and 1.5 hours of professional practice CLE credit in New York.

If you are interested in receiving CA, IL, MO, NY, or TX CLE credit for watching the recorded presentation, you must register for the program by clicking [here](#).

Participants will only be emailed a Certificate of Attendance if the webinar is viewed in its entirety. If you were unable to view the webinar in its entirety, please contact webinarinquiries@thompsoncoburn.com to see if you are eligible to receive partial credit.

If you do not receive your Certificate of Completion, please e-mail webinarinquiries@thompsoncoburn.com.

Presenter

[Steve Gorin](#)

[For technical materials supporting the slides, please see Steve's newsletter.](#)

Originally Presented:

July 25, 2023



authorsTest

steve

Steve B. Gorin