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partners on their individual income tax returns (and they pay the associated tax).

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The deduction under § 199A for 20% of qualified business income from a pass-through entity. The discussion incorporates the final regulations, and includes a new

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problem set. The impact on choice of entity of the 21% corporate income tax rate, lower individual income tax rates, the 20% deduction for qualified business income, and other tax and business planning considerations.

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Partnership taxation is often considered one of the most difficult areas

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of tax. However, given the growing number of limited liabilities companies (which generally are taxed as partnerships for tax purposes), it is extremely beneficial to have a working knowledge of this area. In addition, partnership tax provides a flexibility found nowhere else in

Problems and Solutions in

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in Partnership Tax does just that; it provides numerous examples of how the rules for partnerships are applied. It begins with the most basic, such as the rules governing the contribution of property to a partnership, selection of the taxable year, and computation of partnership taxable income.

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Coverage of all significant developments since the last edition, including the impact on choice of business entity of the now permanent higher marginal individual tax rates and the 3.8% tax on net investment income tax; final regulations on noncompensatory options and

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partnership allocations where interests change during the year; and new proposed regulations on partnership liabilities, § 751(b) disproportionate distributions, and disguised payments for services as applied to investment ...

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704(b) And 752
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the heart and soul of
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"aggregate" theory of partnerships and partners.

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(Tax Terminology) A.
Taxes have two
components: tax rate
and tax base. B. Tax
Rates – Tax rates can

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be structured to yield:

1. Proportional tax: The rate of tax remains constant over the tax base (sales tax);
- 2.

CHAPTER 1

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