

Federal Tax Update

William P. Bowers
2200 Ross Avenue, Suite 2800
Dallas, Texas 75201
(214) 855-3903
bill.bowers@nortonrosefulbright.com

Patrick L. O'Daniel
98 San Jacinto Boulevard, Suite 1100
Austin, Texas 78701
(512) 536-5264
patrick.odaniel@nortonrosefulbright.com

Norton Rose Fulbright US LLP
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1

Topics Covered:

- Section 199A Deduction
- Choice of Entity
- Loss Limitation
- Interest Expense Limitation
- Carried Interest Holding Period

2

Topics Covered (cont.):

- Negative Capital Account Reporting
- Partnership Examinations

§199A Final Regulations

§199A Final Regulations:

Highlight Certain Changes from Proposed Regulations

- Safe-harbor for real estate leasing as trade or business.
- Unadjusted basis of QP transferred in tax-free transactions.

§199A Final Regulations (cont.)

- Unadjusted basis and Section 743 adjustment.
- Crack-and-Pack transaction for SSTB.
- De-minimis rule for trade or business with SSTB component.

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