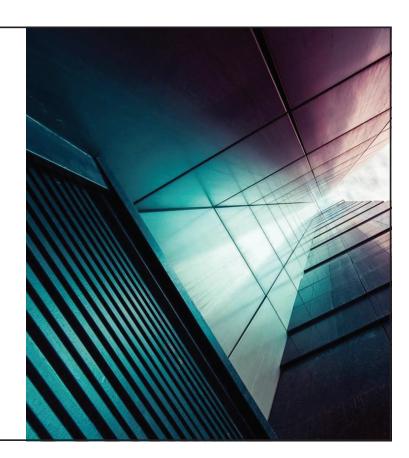
#### NORTON ROSE FULBRIGHT

### **Federal Tax Update**

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Norton Rose Fulbright US LLP July 18, 2019



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## **Topics Covered:**

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

**NRF** 

## **Topics Covered (cont.):**

- Negative Capital Account Reporting
- Partnership Examinations

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# §199A Final Regulations

**NRF** 

## §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.

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## §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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<u>Answer Bar: LLCs and Partnerships Formation</u>

First appeared as part of the conference materials for the  $28^{\text{th}}$  Annual LLCs, LPs and Partnerships session "Federal Tax Update"