

Hello. It looks like you're using an ad blocker that may prevent our website from working properly. To receive the best experience possible, please make sure any blockers are switched off and refresh the page.

If you have any questions or need help you can email us

Trust

Thomson Reuters has released a special report, *Sales to Intentionally Defective Irrevocable Trusts*, which discusses the sale to an intentionally defective irrevocable trust (IDIT) in exchange for its promissory note. The report establishes that the ...

Jan. 12, 2017



Thomson Reuters has released a special report, *Sales to Intentionally Defective Irrevocable Trusts*, which discusses the sale to an intentionally defective irrevocable trust (IDIT) in exchange for its promissory note. The report establishes that the sale to an IDIT is recognizable as a sale and not a transfer of wealth for estate planning purposes.

The report examines the structure of standard sale transactions to an IDIT as well as

Hello. It looks like you're using an ad blocker that may prevent our website from working properly. To receive the best experience possible, please make sure any blockers are switched off and refresh the page.

If you have any questions or need help you can email us

treatment of certain estate planning tools, helping clients better conserve their assets for future generations, while minimizing tax liability.”

The report explains the tax treatment of any capital gains or income arising from an IDIT transaction, including interest accrued from a promissory note, complete with the citation of accompanying tax codes. It also discusses variations of the standard sale to an IDIT. Additionally, the report analyzes the rulings in four recent estate planning cases and their impact on strategy surrounding the sale to an IDIT, including a final decision by the Tax Court and three companion cases centered on individual estates.

The free report is available for download at tax.thomsonreuters.com/products/brands/checkpoint/IDIT.

This special report is published courtesy of Thomson Reuters Checkpoint's WG&L *Estate Planning*, a monthly journal that alerts readers to timely tax issues, focusing on practical strategies to reduce client taxes and satisfy statutory and regulatory compliance mandates.

Thomson Reuters **Checkpoint** tackles market disruption through integrated research, editorial insight, productivity tools, online learning and news updates along with intelligent links to related content and software. It is relied on by hundreds of thousands of tax and accounting professionals, and counts among its customers 97 of the Top 100 U.S. law firms, 99 of the Fortune 100 companies, and all of the top 100 U.S. CPA firms.

Hello. It looks like you're using an ad blocker that may prevent our website from working properly. To receive the best experience possible, please make sure any blockers are switched off and refresh the page.

If you have any questions or need help you can email us