

Tax Considerations in Real Estate Transactions Agenda

I. IRC Section 1031 Exchanges

- A. Overview of Like-Kind Exchanges
- B. Fundamentals of Like-Kind Exchanges
- C. Deferred Gains Triggered by Exchanges between Related Persons
- D. “Boot” in Like-Kind Exchanges and the Effect of Mortgages
- E. Like-Kind Exchanges Using LLC’s
- F. Installment Sales and Exchanges
- G. IRS Audit Considerations
- H. Recent IRS Announcements
- I. New IRS Guidance for 1031 Exchanges of Fractional Interests

II Considerations Re: Specific Exchange Types

- A. Simultaneous Exchanges
- B. Deferred “*Starker*” Exchanges
- C. Reverse Exchanges
- D. Build-to-Suit Exchanges