COURSE: FINC-GB.2110.10 Fall 2015  
TIME: 6:00 P.M. – 9:00 P.M.

PLEASE NOTE: Since there are only 6 classes to this course and there are no textbooks used, it is imperative that you attend all classes.

SYLLABUS

SESSION I  BEDROCKS OF INVESTMENT TAXATION  
9/29/2015  
- Tax favored income: Long-term capital gains, dividend income, municipal bonds  
- Holding periods (IRC §1222 and §246)  
- Limitations on Capital losses (IRC §1211)  
- Step-up in basis at death (IRC §1014)  
- Passive vs. active for the taxable investor

SESSION II  DIVIDEND INCOME TAXATION AND CAPITAL LOSSES  
10/6/2015  
- Value of Loss Harvesting  
- Wash Sale Rules (IRC §1091)  
- “Substantially Identical” standard

SESSION III  ASSET LOCATION  
10/20/2015  
- Taxable Account vs. Retirement Account  
- The “Benefits” of deferral  
- Case Study – Where best to own a growth stock  
- Utilization of GRATs (Grantor Retained Annuity Trust)

SESSION IV  SIMILAR ECONOMICS BUT DIFFERENT TAXATION  
10/27/2015  
- Derivatives can change timing and/or character  
- IRC §1256 Contracts  
- Choosing the most efficient investment vehicles  
- Pre-paid Forward Contracts

SESSION V  HEDGE FUNDS INVESTING FOR THE TAXABLE INVESTOR  
11/3/2015  
- Interaction of flow-through vehicles and Miscellaneous Itemized Deductions  
- Options on Hedge Funds (IRC §1260)  
- Utilization of the Offshore Fund (IRC §1291-1295)

SESSION VI  HEDGING  
11/10/2015  
- History of IRC §1259 – The Constructive Sale Rule  
- Implications of the Straddle Rules (IRC §1092)  
- Recent Rulings on Pre-Paid Variable Forwards  
- The 70% Overlap Test (IRC §246)