TAXES AND INVESTING

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COURSE: FINC-GB.2110.10 Fall 2016

DATE: Tuesdays September 20, 2016 – November 1, 2016

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 <u>BEDROCKS OF INVESTMENT TAXATION</u>

9/20/2016 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 <u>DIVIDEND INCOME TAXATION AND CAPITAL LOSSES</u>

9/27/2016 Value of Loss Harvesting

Wash Sale Rules (IRC §1091) "Substantially Identical" standard

SESSION III ASSET LOCATION

10/4/2016 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

10/18/2016 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

10/25/2016 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

11/1/2016 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)