

Larry's Tax Law

Holiday Greetings from Larry's Tax Law

By Larry Brant on 12.29.16 | Posted in Personal Message from Larry

It is hard to believe, but 2016 is close to an end. The year has proven to be a quite fascinating year in the world of tax law. Given the results of November's presidential election and the composition of the House and the Senate, 2017 should be even more intriguing in terms of tax law developments. I plan to report these tax developments as they occur in the new year. Stay tuned!

During the past twelve months, we have explored numerous tax topics, including:

- The [rise](#) and [fall](#) of Oregon's proposed Measure 97;
- The saga of former U.S. Tax Court Judge Diane L. Kroupa, including her [original indictment](#), the [allegations against Ms. Kroupa](#) made by her now estranged husband and her eventual [guilty plea](#);
- The estates of [Michael Jackson](#) and [Prince](#);
- The new partnership audit [regime](#);
- New IRS Appeals [rules and procedures](#);
- The [deductibility of the expenses](#) incurred in obtaining an advanced degree – *Emmanuel A. Santos v. Commissioner*, TC Memo 2016-100;
- Tax laws relating to [legalized sales of cannabis](#); and
- The [tax gap](#).

2016 was an especially rewarding year in terms of professional development. Apart from an active law practice and maintaining the blog, I was blessed with the opportunity of making additional contributions to the field, such as:

- Releasing a white paper on QSUBs (which I presented at the New York University 74th Institute on Federal Taxation in 2015) that was published by Matthew Bender & Company, Inc.;
- Authoring a new white paper – *Entity Classification – Another Look At the Check-The-Box Regulations* and presenting it at the New York University 75th Institute on Federal Taxation in New York City and San Diego. It will be published by Matthew Bender &

Company, Inc. in 2017;

- Presenting my QSUB white paper at the NYU Summer Institute in Taxation in New York City;
- Presenting a white paper on Worker Classification at the Florida Tax Institute in Tampa;
- Publishing the lead article in the September *Journal of Taxation* – The Qualified Subchapter S Subsidiary Election – A Primer and Beyond; and
- Presenting white papers on various tax topics at other tax conferences, including the IRS Tax Practitioners Forum; the Eugene Springfield Tax Conference; the OSCP Business and Industries Annual Seminar; the OSB Tax Section Speakers Series; and the OSCP Annual Real Estate Tax Conference.

I feel extremely fortunate to have the support of my family, friends, law colleagues at GSB, the local tax bar and the local accounting community. In addition, I am thankful for the friendship of special colleagues in the tax and legal professions who have served as role models, advisors and motivators during the development of my career. These folks include (but are not limited to) the late Clifford B. Alterman (Portland), the late Jack Freeland (Gainesville), the late Bill Schantz (Portland), Jerald August (New York City), Louis Nostro (Miami), Martin McMahon (Gainesville), Dennis Calfee (Gainesville), Terry Cuff (Los Angeles) and David Richardson (Gainesville).

President John F. Kennedy said: “As we express our gratitude, we must never forget that the highest appreciation is not to utter words, but to live by them.” I have and continue to strive to live my professional life by the very examples that these very special people have provided. Giving back and sharing written thoughts, developments and ideas with the tax and legal communities remain at the top of my career priority list.

Best wishes to you and your families for a wonderful holiday season and a terrific 2017. I am looking forward to exploring many more interesting tax law developments with you in the coming year.

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