



Blanche Lark Christerson  
Managing Director, Senior Wealth Planning Strategist

# Tax Topics

## Table of Contents

2013

### 2013

12/20/13	Budgets, tax reform and "extenders"; end of the year round-up	2013-12
11/15/13	The government shutdown, and selected inflation-adjusted numbers for 2014 and end-of-the-year planning points	2013-11
10/07/13	A review of basic planning points	2013-10
08/30/13	Revised discussion of <i>Windsor</i> , reflecting guidance from the IRS and the Treasury Department, issued on August 29, 2013	2013-09
08/28/13	<i>United States v. Windsor</i> : the Supreme Court rejects Section 3 of DOMA, which defines "marriage" as only between a man and a woman	2013-08
07/01/13	Selected planning points: the now "permanent" \$5 million exclusion, indexed for inflation, state estate taxes and "portable" spousal exclusions	2013-07
05/29/13	Updated discussion of selected options to save for a child's college education	2013-06
04/29/13	Selected tax provisions from President Obama's Fiscal Year 2014 Budget	2013-05
03/21/13	Updated estate planning glossary and selected income tax terms	2013-04
02/20/13	Conservation easement flunks as charitable contribution ( <i>Belk</i> ); "DD" and the cost of employer-provided health care; two important 100-year anniversaries; some lesser-known provisions of the American Taxpayer Relief Act	2013-03
01/25/13	Selected numbers from official IRS 2013 inflation-adjustments (Rev. Proc. 2013-15); façade easement has zero value as charitable deduction ( <i>Scheidelman</i> )	2013-02



01/10/13	Selected overview of the "American Taxpayer Relief Act of 2012" (H.R. 8): 2001 and 2003 tax cuts largely made permanent, but higher taxes for the top 1% to 2%	2013-01
<b>2012</b>		
12/31/12	Proposed regulations on the 3.8% tax on "net investment income"; <i>Wandry</i> again, and how many gift tax dollars the "defined value" clause saved	2012-09
11/30/12	The "fiscal cliff," alternative minimum tax and transfer taxes; IRS "non-acquiesces" in <i>Wandry</i> ; possible taxpayer relief for those affected by Hurricane Sandy	2012-08
10/31/12	Countdown to the election; selected 2013 inflation-adjusted numbers and various planning points; <i>Wandry</i> appeal withdrawn	2012-07
09/25/12	The looming "fiscal cliff" and the shape of possible future tax legislation; how NOT to substantiate a charitable deduction ( <i>Mohamed v. Commissioner</i> ); <i>Wandry</i> appealed	2012-06
07/31/12	The Supreme Court's health care decision: The Affordable Care Act upheld	2012-05
06/11/12	<i>Wandry v. Commissioner</i> : yes, another taxpayer victory using a "defined value" formula clause – but caution may be in order	2012-04
04/19/12	Supreme Court arguments on the health care law; Medicare taxes taking effect in 2013: 0.90% on the wages of "high earners" and 3.8% tax on "net investment income"; the Buffett Rule and the "Paying a Fair Share Act" (S. 2230)	2012-03
03/08/12	Tax proposals on "high-income" taxpayers from President Obama's Fiscal Year 2013 Budget and the Treasury Department's "Green Book"	2012-02
01/23/12	<i>Estate of Petter v. Commissioner</i> : another taxpayer victory using a "defined value" formula clause, and the legacy of <i>Procter v. Commissioner</i>	2012-01
<b>2011</b>		
12/02/11	"Super Committee" bows out; 2012 inflation-adjusted numbers and various planning points; the "Sensible Estate Tax Act of 2011" (H.R. 3467)	2011-09
10/21/11	The American Jobs Act of 2011: the 28% limitation, the millionaires' surtax, and the "Buffett Rule"	2011-08
09/16/11	The Budget Control Act of 2011 (Pub. L. 112-25) and the "Super Committee": reduce the deficit – or else!	2011-07
07/28/11	How certain discretionary language almost made a credit shelter trust taxable in the trustee/beneficiary's estate ( <i>Estate of Chancellor v. Commissioner</i> )	2011-06
06/13/11	A Tax Court valuation case that illustrates just how far apart the experts can be, and how a judge evaluates those experts ( <i>Estate of Mitchell</i> )	2011-05
05/03/11	Additional thoughts on last December's 2010 Tax Act: lifetime gifts (GRATs, Sales to Defective Grantor Trusts and QPRTs) and how "credit shelter trusts" are still relevant despite the "portability" of a deceased spouse's estate tax exclusion	2011-04

04/06/11	What it means to be a "statutory resident" of New York for income tax purposes – and how expensive that can be ( <i>Matter of Baker</i> )	2011-03
02/24/11	Updated "estate planning glossary"	2011-02
01/31/11	A discussion of "tax expenditures" and possible tax reform, based on reports from the President's Deficit Commission and the National Taxpayer Advocate	2011-01
<b>2010</b>		
12/23/10	Overview of the Tax Relief, Unemployment Insurance Reauthorization, and Job Creation Act of 2010 (Pub. L. 111-312): income tax and capital gains rates, tax-free distributions from IRAs to charity; estate and gift tax and GST provisions	2010-11
11/30/10	Thoughts on the mid-term elections, and selected year-end planning points, along with some of the inflation-adjusted pension plan numbers for 2011; brief reminder of what low interest rates mean for certain planning techniques, including GRATs (grantor retained annuity trusts) and Sales to Defective Grantor Trusts	2010-10
10/26/10	<i>Estate of Tatum</i> : another disclaimer gone awry – but taxpayer loses this time; possible timeline for retroactive reinstatement of estate tax and GST, based on <i>Carlton</i> , a 1994 Supreme Court estate tax case	2010-09
09/14/10	Taxpayer successfully rescinds defective disclaimers and avoids significant gift tax liability ( <i>Breakiron</i> ); discussion of <i>Bosch</i> , the vintage case addressing when a state law holding is binding on the IRS	2010-08
07/27/10	A discussion of next year's likely return of "PEP" and "Pease" (indirect tax increases on higher earners) and the potential impact on charitable giving; two cases involving purported charitable gifts and a skeptical IRS: <i>Hendrix</i> and <i>Free Fertility Foundation</i>	2010-07
07/01/10	A round-up of the still uncertain tax landscape: Sen. Bernie Sanders' estate tax bill and its revenue raisers (consistent basis reporting, limits on valuation discounts and GRAT restrictions), "PAYGO" and Sen. Kyl's estate tax proposal; Rep. Ryan's "Roadmap"; NY drops "privity" requirement for executor's suit against estate planning attorney ( <i>Schneider v. Finnman</i> )	2010-06
05/28/10	" <i>Pierre II</i> ": the Tax Court addresses the "step transaction doctrine" and valuation issues in a continuation of the <i>Pierre v. Commissioner</i> saga; valuation of fractional interests used in QPRTs ( <i>Ludwick v. Commissioner</i> )	2010-05
05/06/10	An updated discussion of some of the options to save for a child's college education	2010-04
04/05/10	An overview of some of the provisions in the new health care legislation, particularly the new Medicare taxes; codification of "economic substance doctrine"; GRAT restrictions advance	2010-03
02/28/10	President Obama's FY 2011 Budget – increases on higher earners, and estate and gift tax proposals: return to the 2009 estate tax regime, consistent values, modifying rules on valuation discounts and mandating minimum 10-year term and remainder interest for GRATs; under the "check-the-box" regulations, is a single member LLC disregarded for gift tax purposes? ( <i>Pierre v. Commissioner</i> )	2010-02

01/26/10	The 2010 planning landscape: NO estate tax, GST or basis adjustment rules; what Congress may do; possible constitutional "due process" challenge; what can go wrong when documents are wrong about how property is titled ( <i>Beudert-Richard v. Richard</i> )	2010-01
<b>2009</b>		
12/22/09	The imminent demise of the estate tax? Possible effect on formula provisions and the difficulties of modified carryover basis; extenders bill and carried interest; proposed stock transactions tax; importance of keeping beneficiary designations current ( <i>Kennedy v. DuPont SIP</i> )	2009-10
09/30/09	More on Roth IRA conversions: calculating what the taxable amount may be; how a "decoupled" state may tax a non-resident's property, even if it's passing to a surviving spouse; NY advisory opinion on non-resident's proposed condo purchase (TSB-A-08(1)M)	2009-08
08/31/09	What may happen with estate tax repeal and tax-free IRA distributions to charity; early 2009 AMT "patch"; Roth IRA conversions in 2010 – restrictions will be gone so that anyone may convert a "regular" IRA to a Roth	2009-07
07/28/09	Some pros and cons of several options to pay for health care reform; the case of the "tainted witness" and a will's tax apportionment clause ( <i>Estate of Wu</i> ); how some states are dealing with economic adversity	2009-06
06/15/09	OMB's "Analytical Perspectives" and Treasury Department's "Green Book" offer insights on Obama tax proposals and outline of estate and gift tax proposals: consistent values, modifying rules on valuation discounts and minimum 10-year terms for GRATs; taxing employer-provided health care?; new mortality tables and QPRTs; New York's increased taxes and estimated tax payments	2009-05
04/20/09	The "Taxpayer Certainty and Relief Act of 2009" (S. 722) – makes lower income tax rates permanent, increases higher rates, and freezes the estate tax at 2009 levels; focus on whether Congress might reinstate the state death tax credit; new task force on tax reform	2009-04
03/19/09	President Obama's FY 2010 budget proposal: higher rates, limits on itemized deductions and the personal exemption phase-out; the interaction of the regular tax with the AMT; historical income tax and capital gains tax rates; S. 394 would enhance the tax treatment of art and collectibles	2009-03
02/09/09	Rep. Pomeroy's estate tax bill (H.R. 436); basic planning points; basis adjustment rules, including modified carryover basis in 2010; "The Rangel Rule" (H.R. 735); intra-family loans	2009-02
01/12/09	Suspension of 2009 required minimum distributions under <i>The Worker Retiree and Employer Recovery Act of 2008</i> (Pub. L. 110-458); a brief mention of another "bad facts" limited partnership case ( <i>Hurford</i> )	2009-01

## 2008

12/02/08	Prospective tax increases and their possible revenue implications; inflation-adjusted numbers for 2009 and selected planning points	2008-11
11/04/08	<i>The Emergency Economic Stabilization Act of 2008 (Pub. L. 110-343)</i> : AMT extenders and ISO relief, tax-free IRA distributions to charity, deduction for state and local sales taxes, broker basis reporting, and harmonizing preparer penalties for undisclosed positions; making lemonade out of lemons – coping with the market decline	2008-10
09/30/08	A discussion of the upcoming \$3.5 million estate tax exclusion, and how it affects planning in “decoupled” states, especially for married couples	2008-09
08/29/08	A selected review of major tax legislation during the Bush administration, and a snapshot of the tax proposals of Senators McCain and Obama	2008-08
07/31/08	No discount for “restricted management accounts” (Rev. Rul. 2008-35); final regs on “grantor retained interest trusts” (T.D. 9414)	2008-07
06/30/08	Charitable remainder trusts and UBTI: final regs (T.D. 9403); charitable lead trusts and “tiering” provisions: proposed regs (REG-101258-08)	2008-06
05/30/08	Supreme Court holds that muni bonds still tax free ( <i>Kentucky v. Davis</i> ); IRS issues proposed regs on alternate valuation (REG-112196-07; <i>Kohler v. Commissioner</i> )	2008-05
04/28/08	The awful AMT and its disappearing exemption; Notice 2008-22 and a trust grantor’s “nonfiduciary” power to swap trust property for property of equivalent value; planning techniques that work well in a low-interest rate environment	2008-04
03/31/08	Disclaimers and self-adjusting valuation clauses ( <i>Christiansen</i> )	2008-03
02/26/08	More on the new preparer penalties: Notice 2008-13	2008-02
01/28/08	Supreme Court affirms that trust investment advisory fees subject to 2% floor ( <i>Knight</i> ); wash sale rules and IRAs; survivorship and the marital deduction ( <i>Lee</i> )	2008-01

## 2007

12/21/07	AMT patch, cont’d.; 11 <sup>th</sup> Circuit reverses Tax Court: built-in capital gains tax liability reduces value of closely held corporation: <i>Estate of Jelke (General Utilities doctrine)</i> ; willing buyer-willing seller; IRA implications)	2007-12
11/20/07	AMT patch; inflation-adjusted numbers for 2008 and planning points; 0% rate for dividends and capital gains	2007-11
10/26/07	Preparer penalties: the new rules under the Small Business and Work Opportunity Act of 2007; transition rules under Notice 2007-54	2007-10
09/28/07	Charlie Rangel’s proposal; AMT and estimated tax; taxing “carried interest”	2007-09
08/31/07	Saving for college: the “kiddie tax” and the pros and cons of different savings vehicles	2007-08

07/31/07	<i>Davis v. Kentucky Revenue Department</i> – Supreme Court to examine muni bond taxability; proposed regs on trust investment fees and the 2% floor (REG-128224-06)	2007-07
06/28/07	Proposed regs on grantor retained income trusts (REG-119097-05); why timing of payments matters; why there's a 7520 rate; <i>Rudkin</i> update	2007-06
05/31/07	"Kiddie tax" changes; custodial accounts; "pay-go"; whether the estate tax; get a good valuation expert! ( <i>Kimberlin</i> )	2007-05
04/27/07	2 <sup>nd</sup> Circuit affirms that trust investment fees subject to 2% floor: <i>Rudkin</i>	2007-04
03/29/07	IRS Clarification: non-spousal rollovers and tax-free IRA distributions to charity (Notice 2007-7); tax patents; Chuck Grassley on the AMT and the "tax gap"	2007-03
02/28/07	Estate Planning Glossary	2007-02
01/30/07	The "First 100 Hours"; President Bush's health care proposals; 2006 Annual Report of the National Taxpayer Advocate	2007-01
<b>2006</b>		
12/29/06	<i>The Tax Relief and Health Care Act of 2006 (Pub. L. 109-432)</i> : "extenders"; health savings accounts; AMT refundable credit; charitable remainder trusts and UBTI; permanent capital gain treatment for self-created musical works	2006-11
11/22/06	The mid-term elections; 2007 inflation-adjusted numbers	2006-10
10/23/06	More on the <i>Pension Protection Act of 2006</i> : fractional interest gifts and \$100,000 tax-free IRA contributions to public charities; Charlie Rangel and AMT reform; Connecticut marital deduction for same-sex couples	2006-09
09/08/06	<i>The Pension Protection Act of 2006 (Pub. L. 109-280)</i> : selected retirement and charitable provisions	2006-08
07/31/06	<i>Estate Tax and Extension of Tax Relief Act of 2006 (H.R. 5970)</i> ; Illinois decoupling ( <i>McGinley v. Madigan</i> ); non-resident income taxation and out-of-state property	2006-07
06/27/06	<i>Permanent Estate Tax Relief Act of 2006 (PETRA, H.R. 5638)</i>	2006-06
05/31/06	<i>Tax Increase Prevention and Reconciliation Act of 2005 (Pub. L. 109-222)</i> : "kiddie tax"; conversions to Roth IRAs; expatriate income and housing exclusion; capital gains treatment for self-created musical works	2006-05
04/28/06	The AMT and stock options: capital loss carryback prohibitions apply to AMT as well ( <i>Merlo</i> ); attempted assignment of income fails ( <i>McManus</i> ); assignment of income: non-qualified stock options and charitable remainder trusts	2006-04
03/29/06	4 <sup>th</sup> Circuit upholds IRS win in <i>Chawla</i> , but "insurable interest" issue still dangles	2006-03
02/22/06	Charitable Remainder Trust Safe-Harbor (Notice 2006-15); more on prepaid tuition; debts, forgiveness and taxes	2006-02

01/27/06	Prepaid tuition (PLR 200602002); gift and estate tax reminder; "Personal Revival Trusts" for cryonauts	2006-01
<b>2005</b>		
12/27/05	Tax Reform Panel Recommendations; Ron Wyden's "Fair, Flat Tax Act of 2005"	2005-12
11/18/05	Hurricane Katrina Provisions; 2006 inflation-adjusted numbers; sale of remaining lottery payments is not a sale of a "capital asset" ( <i>Prebola</i> )	2005-11
10/18/05	Saving for College – round-up of options	2005-10
09/30/05	<i>Ittleson</i> – New York taxes sale of non-resident's artwork	2005-09
09/08/05	Estate tax thoughts; GST consequences of taxable trust renunciation (PLR 200532024); note about the "rule against perpetuities"	2005-08
07/29/05	<i>Strangi</i> – 5 <sup>th</sup> Circuit upholds IRS win in Texas FLP case	2005-07
06/30/05	Circular 230	2005-06
05/27/05	Estate planning glossary; Washington state's new estate tax	2005-05
04/20/05	New Jersey loses on decoupling case ( <i>Oberhand</i> ); retroactive tax changes ( <i>Nationsbank</i> ); charitable remainder trust "safe harbor" rules and the right of election (Rev. Proc. 2005-24)	2005-04
03/28/05	Insurable interests and trusts: <i>Chawla</i> ; "frivolous arguments to avoid when paying taxes" (Notice 2005-30)	2005-03
02/18/05	Washington State decoupling struck down: <i>Hemphill</i>	2005-02
01/28/05	Social security, the estate tax and tax reform; several cases: <i>Banks</i> (contingent attorney's fees); <i>Harkins</i> ("corporation sole"); <i>Davis</i> (marital deduction)	2005-01
<b>2004</b>		
12/28/04	The Barnes Foundation	2004-15
11/24/04	2005 inflation-adjusted numbers; how a low 7520 rate affects planning techniques	2004-14
11/05/04	Tax reform: flat tax and consumption tax; American Jobs Creation Act deductions for sales tax and attorneys' fees; New York tax law change: non-resident's sale of co-op now taxable	2004-13
10/08/04	<i>The Working Families Tax Relief Act of 2004 (H.R. 1308)</i> : extension through 2010 of 10% and 15% brackets; that "ridiculously complex" tax code; a word on PORC; reminder about low 7520 rates	2004-12
09/10/04	<i>Turner v. Commissioner</i> (formerly <i>Thompson</i> ): 3d Circuit affirms IRS Tax Court win against FLP (family limited partnership); <i>Turner</i> contrasted with <i>Kimbell</i>	2004-11

08/03/04	Tax Court says stock transfers to FLP are indirect gifts ( <i>Senda</i> ); co-op's real estate taxes not deductible against AMT ( <i>Ostrow and Guterman</i> )	2004-10
07/14/04	IRS addresses grantor trust rules and implications of tax reimbursement clauses (Rev. Rul. 2004-64); LUST tax	2004-09
06/25/04	H.R. 4520, the export bill; proposals for state and local sales tax deduction and deferred compensation; House bills; temporary Connecticut decoupling; 7520 rate chart	2004-08
05/28/04	<i>Kimbell v. U.S.</i> – 5 <sup>th</sup> Circuit hands taxpayer a victory in FLP case; how the applicable federal rates are determined	2004-07
04/28/04	Export bill: economic substance doctrine, expanded "kiddie tax"; no dice on offsetting gambling losses (TAM 200417004); QSLOB election	2004-06
04/02/04	President Bush's 2005 budget takes aim at 529 plan "loopholes"; deductibility of attorneys' fees – Supreme Court grants cert on <i>Banaitis</i> and <i>Banks</i>	2004-05
03/18/04	Impact of 2001 and 2003 tax law changes and interplay with AMT; reminder about low 7520 rates	2004-04
02/27/04	More thoughts on "decoupling": New York, New Jersey and Connecticut – the power of lifetime gifts; pro-rating the tax on a New York trust that changes situs	2004-03
02/03/04	Tax clause nightmare: <i>Lurie v. Commissioner</i> , or the pain of charging taxes to a non-taxable share; interrelated computations	2004-02
01/14/04	New York fiduciary income tax and trust situs: <i>Estate of William Rockefeller</i> and <i>Matter of Harriet Bush</i> ; codification of <i>Mercantile</i>	2004-01
<b>2003</b>		
12/19/03	More changes on New York's 529 Plan; intra-family loans: term and demand loans, and forgiving them; note on William Roth and John Breaux	2003-21
11/26/03	Inflation-adjusted numbers for 2004; charitable remainder trusts, "ordering rules" and qualified dividends (REG-110896-98)	2003-20
11/10/03	Connecticut "decouples" for a bit; New York and New Jersey "decoupling" – disclaimers and contingent QTIPs; changes to New York's 529 Plan	2003-19
10/24/03	IRS acquiesces in <i>Walton</i> GRAT decision (Notice 2003-72); Social Security and "full retirement age"	2003-18
10/10/03	The Independent 529 Plan	2003-17
09/26/03	IRS guidance on reporting requirements for substitute dividends (Notice 2003-67); the "Wall Street Rule"; tax reward money taxable ( <i>Roco</i> )	2003-16
09/05/03	The fall legislative agenda; saving for a child's college education	2003-15

08/06/03	<i>Strangi III</i> – the Tax Court thumps taxpayer in Texas FLP case	2003-14
07/23/03	7 <sup>th</sup> Circuit upholds IRS win in <i>Hackl</i> : no annual exclusion for gifts of LLC interests	2003-13
07/01/03	New York's "tax traps" regarding the estate tax, GST and non-residents	2003-12
06/16/03	More on JGTRRA, qualified dividends and the new tax rates	2003-11
06/06/03	JGTRRA: lower rates, qualified dividends, increased child tax credit; marriage penalty relief; increased AMT exemption; chart with phase-outs of the AMT exemption amounts	2003-10
05/16/03	Jobs and growth bill; trust's investment fees subject to 2% floor ( <i>Scott</i> ); tax apportionment ( <i>PNC Bank v. Roy</i> ); Michigan and the TPT credit ( <i>Lacks v. Michigan Department of Treasury</i> )	2003-09
05/02/03	Jobs and growth bill; flat tax proposals; tax apportionment ( <i>Kuralt</i> )	2003-08
04/11/03	Budget update; estate tax pitfalls for non-resident aliens ( <i>Fung</i> ); "indirect skips" and the GST; QTIP election boo-boo (PLR 200314012); early CRUT termination and capital gain (PLR 200314021)	2003-07
03/28/03	Budget news; contingent attorneys' fees ( <i>Raymond</i> ) – and how AMT interacts with them	2003-06
03/13/03	Budget and legislative update; marital deduction mess-up ( <i>Davis</i> ); limited education no defense against estate tax deficiency ( <i>Koester</i> )	2003-05
02/28/03	Taxpayer's SCIN works ( <i>Estate of Dulio Costanza</i> ); SCIN contrasted with private annuity; IRS loses on "joint-spousal GRATs" ( <i>Cook</i> )	2003-04
02/14/03	Details on Fiscal Year 2004 Budget, including various proposed savings accounts (lifetime, retirement and employer-sponsored); impact on 529 plans; a closer look at arguments in favor of tax-free dividend proposal	2003-03
01/31/03	State of the Union address and tax-free dividend proposal; CBO's deficit numbers; Sen. Daschle on the Democratic plan; is all retirement plan income "effectively" tax-free? (KD 3761); "decoupling" in Nebraska and Kansas	2003-02
01/16/03	President Bush's job creation plan and tax proposals, including tax-free dividends; Sen. Feinstein on freezing the top rate; JCT lists expiring provisions; House rules to require macroeconomic analyses; dynamic scoring	2003-01
<b>2002</b>		
12/19/02	New faces: John Snow and Steven Friedman; adjustment clause too much like <i>Procter</i> – Mom can't take back gift (TAM 200245053); non-immigrant visa doesn't preclude domicile ( <i>Estate of Jack</i> ); payments to Holocaust survivors permanently exempted from income tax	2002-22
11/27/02	Our "abominable" tax code and how it got that way; Lindy Paull's departure; how 7520 rates affect planning techniques – why GRATs work better with lower rates and QPRTs don't	2002-21

11/19/02	Aftermath of the mid-term elections and the AMT; estate tax issues; inflation-adjusted numbers for 2003	2002-20
10/25/02	Run-down on proposed legislation: the CARE and NESTEG bills; next year's FICA; low 7520 rates and planning: QPRTs, CLATs, CRATs, GRATs and charitable gift annuities	2002-19
09/20/02	Possible permanency of 2001 Tax Act and its education provisions;"decoupling": D.C., Massachusetts, New Jersey and New York	2002-18
09/04/02	Treasury ends "abusive" split-dollar scheme (Notice 2002-59)	2002-17
08/29/02	CBO's budget numbers and stimulus proposals; IRA discussion correction – comment from Cathy Vohs of the IRS	2002-16
08/01/02	CARE Act progresses – proposed gifts to charity from IRAs	2002-15
07/23/02	Corrections on IRA discussion; single life distribution table	2002-14
07/18/02	Corrected discussion on the final minimum distribution regs	2002-13
07/02/02	The debt limit increase; IRS retreats from imposing FICA or FUTA taxes on ISOs (Notice 2002-47)	2002-12
06/21/02	Attempts to make 2001 Tax Act permanent; efforts at estate tax reform; law-school expenses not deductible ( <i>Galligan</i> ); ignorance of the law is no excuse – "innocent spouse" relief denied ( <i>Mitchell</i> )	2002-11
05/24/02	The "sunset" provision of the 2001 Tax Act; new IRA distribution tables	2002-10
04/18/02	Thoughts on 529 Plans; IRS issues final rules on IRA distributions; "decoupling": Maryland, Nebraska and New York	2002-09
04/09/02	Tax Court denies annual exclusion for gifts of LLC interests ( <i>Hackl</i> ); Florida says goodbye to estate tax revenues	2002-08
03/20/02	Senate Finance Committee hearing on tax shelters; Joint Committee on Taxation report on shelters and judicial doctrines used against them	2002-07
03/15/02	Stimulus bill passes; bill to freeze some of 2001 Tax Act; CBO and OMB revenue projections; Concord Coalition suggestions about fiscal year 2003 budget; GRAT includibility under IRC Sec. 2039 (TAM 200210009); Vermont "decoupling"; the GST and "indirect" skips – the opt-out	2002-06
02/28/02	Tax shelter amnesty (Announcement 2002-2); whether the corporate income tax?; IRS permits early CRUT termination (PLR 200208039) and tax treatment of early termination (PLR 200127023); IRS information on Victims' Relief Bill (Publication 3920); New York City's cigarette tax	2002-05
02/22/02	President Bush's fiscal year 2003 budget; Senate vote on estate tax repeal; the shrinking surplus; increase in debt ceiling; taxability of frequent flyer miles (Announcement 2002-18); cigarette taxes	2002-04

01/31/02	Victims' Relief bill signed – planning points; bill to reinstate marital deduction for non-citizen spouses (H.R. 3575); the state death tax credit and “decoupling”: Minnesota, Rhode Island and Wisconsin	2002-03
01/25/02	IRS Notice on split-dollar life insurance (Notice 2002-8)	2002-02
01/11/02	Tom Daschle speech on the economy; 2001 Report of the National Taxpayer Advocate	2002-01
<b>2001</b>		
12/21/01	The stimulus package; the Victims of Terrorism Relief Act; inflation-adjusted numbers for 2002	2001-25
11/30/01	More on Victims of Terrorism bill (history of prior such bills); applicability of FICA and FUTA taxes to ISOs (incentive stock options); proposed regulations (REG-142686-01) and Notices 2001-72 and 2001-73; the AMT and ISOs	2001-24
11/26/01	Stimulus package stalls; Victims' Relief bill progresses; 18% capital gains tax rate and gain on principal residence exclusion (Revenue Ruling 2001-57)	2001-23
10/31/01	More thoughts on the Victims of Terrorism relief bill; FICA increase; France and the VAT	2001-22
10/24/01	Stimulus plans; budget shortfalls in California, Florida, New York and North Carolina	2001-21
09/28/01	9/11 aftermath: Victims of Terrorism Relief Act	2001-20
09/04/01	More on “timing” and the new estate tax rates; the phase-out of the state death tax credit	2001-19
08/07/01	AMT ISO relief?; “timing” and the new estate tax rates; the tax rebates	2001-18
08/02/01	Possible repeal of the “sunset” provision and the estate tax; GST “indirect” skips and deemed allocations	2001-17
07/25/01	GST changes under 2001 Tax Act	2001-16
07/10/01	Two unfavorable IRA rulings: sons can't be default “designated beneficiaries” (PLR 2001260410) and daughter can't name herself as Mom's designated beneficiary after Mom's death (PLR 200126036); new IRA rules wouldn't necessarily have made a difference	2001-15
06/29/01	Some of the numbers behind the 2001 Tax Act	2001-14
06/04/01	Rundown on EGTRRA (the 2001 Tax Act)	2001-13
05/22/01	Gifts to non-grantor trusts under the “Relief” bill; Neal tries to shut down swap funds (H.R. 1785)	2001-12
05/18/01	Rundown on the “Relief” bill; the “Byrd rule”	2001-11

04/20/01	Costs of the "Death Tax Elimination" bill; the Joint Committee on Taxation and revenue estimates; estate tax reform bills; Rangel bill would make state and local taxes deductible against AMT	2001-10
04/13/01	The costs of estate tax repeal	2001-09
04/11/01	President Bush's tax proposals, H.R. 8, "The Death Tax Elimination Act of 2000," carryover basis and "dynamic" versus "static" scoring	2001-08
03/23/01	Competing stimulus bills and possible estate tax relief	2001-07
03/07/01	Stimulus bill in the making; IRA hardship exemption fails ( <i>Gallagher</i> ); tax fraud conviction and sentencing of Dorothy and George Henderson; office space for the Clinton Foundation	2001-06
02/05/01	Projected budget surpluses; President Bush's tax plan; possible estate and gift tax repeal	2001-05
01/30/01	Clarification on new proposed IRA regs	2001-04
01/24/01	Appendix with new IRA distribution period	2001-03
01/22/01	Senate Finance Committee takes shape; new proposed regs on IRA distributions (REG-130477-00 and REG-130481-00)	2001-02
01/10/01	Tax-writing committees take shape; possible tax legislation; IRS loses <i>Walton</i> GRAT case; how tax credits lard up the tax code; joint spousal revocable trust wins and loses	2001-01
<b>2000</b>		
12/20/00	The \$1.3 trillion tax cut; inflation-adjusted numbers for 2001	2000-19
11/29/00	Thoughts on the new faces in Washington; candidates for Chairman of the House Ways and Means Committee	2000-18
11/22/00	The uncertain outcome of the elections; compromise bill on the foreign sales tax regime; standard mileage rates	2000-17
11/17/00	Election outcome unknown, but what the tax-writing committees may look like	2000-16
10/30/00	House passes tax bill, Clinton promises veto; NY streamlines tuition savings plan; FICA increases and Social Security funding	2000-15
10/18/00	Details on 18% capital gains tax rate; deduction and credit for college tuition; conviction of Dorothy and George Henderson for tax fraud	2000-14
10/02/00	H.R. 1102, the "Retirement Security and Savings Act of 2000"; estate tax update	2000-13

09/15/00	Override on "marriage penalty" veto fails; Republican edge in House narrows;"surviving spouse" in same-sex relationship loses 50% co-ownership argument ( <i>Estate of Horstmeier</i> ); credit for tax on prior transfers doesn't fly ( <i>Estates of Harrison</i> ); Gov. Jesse Ventura on Minnesota public school education	2000-12
09/08/00	Override on estate repeal veto fails; final GRAT regulations issued (T.D. 8899, 26 CFR Part 25); settlement fees and tax apportionment ( <i>Estate of Esther Brabson</i> ); dependency exemption for kidnapped child (ILM 200034029)	2000-11
08/07/00	Strategies for passing tax reform; New Hampshire upholds inheritance tax	2000-10
07/14/00	Thoughts on possible estate tax repeal; New Hampshire House overrides inheritance tax repeal veto; the problem of joint-ownership (PLR 200034029); draft legislation to permit fair market value deduction for charitable contributions by artists and authors (S. 2781)	2000-09
06/29/00	Projected surpluses; estate tax repeal movement	2000-08
06/09/00	New Hampshire governor vetoes inheritance tax repeal; IRS ruling on a "5 & 5" power: ever-increasing ownership of the trust (PLR 200022035); IRS wins two cases: gifts to a corporation don't qualify for annual exclusion ( <i>Stinson</i> ); "economic benefit" doctrine doesn't accelerate taxability of lottery winnings ( <i>Thomas</i> )	2000-07
05/19/00	H.R. 8 and estate tax repeal; embezzled money is taxable income ( <i>Amini</i> ); no "married filing jointly" available for taxpayer in same-sex relationship ( <i>Mueller</i> )	2000-06
05/15/00	Estate tax valuation of a disputed claim: <i>Estate of Algerine Smith. Commissioner – 5<sup>th</sup></i> Circuit reverse Tax Court	2000-05
04/13/00	IRS goes after "ghoulish" charitable lead trusts (REG-100291-00; new tax shelter listings apply to individuals as well as corporations; IRS permits disclaimer to change IRA beneficiaries (PLR 200013041); community property IRA distribution to ex-spouse taxable to IRA owner ( <i>Bunney</i> ); charitable bequest of non-qualified stock options taxable to charity, not estate (PLR 20012076)	2000-04
03/24/00	Donees subject to transferee liability ( <i>Armstrong</i> ); converting NIM-CRUTs to CRUTs (Notice 99-31); discharge of GRAT liability (TAMs 200010010 and 200011005)	2000-03
02/28/00	Corporate tax refunds are up; taxpayer wins Texas partnership case ( <i>Elsie Church v. United States</i> )	2000-02
0/11/00	President Clinton's final budget (fiscal year 2001); attempted casualty loss for property next to O.J. Simpson's estate ( <i>Chamales</i> )	2000-01

---

Blanche Lark Christerson is a managing director at Deutsche Asset & Wealth Management in New York City, and can be reached at [REDACTED].

The opinions and analyses expressed herein are those of the author and do not necessarily reflect those of Deutsche Bank AG or any affiliate thereof (collectively, the "Bank"). Any suggestions contained herein are general, and do not take into account an individual's specific circumstances or applicable governing law, which may vary from jurisdiction to jurisdiction and be subject to change. No warranty or representation, express or implied, is made by the Bank, nor does the Bank accept any liability with respect to the information and data set forth herein. The information contained herein is not intended to be, and does not constitute, legal, tax, accounting or other professional advice; it is also not intended to offer penalty protection or to promote, market or recommend any transaction or matter addressed herein. Recipients should consult their applicable professional advisors prior to acting on the information set forth herein. This material may not be reproduced without the express permission of the author. "Deutsche Bank" means Deutsche Bank AG and its affiliated companies. Deutsche Asset & Wealth Management represents the asset management and wealth management activities conducted by Deutsche Bank AG or its subsidiaries. Clients are provided Deutsche Asset & Wealth Management products or services by one or more legal entities that are identified to clients pursuant to the contracts, agreements, offering materials or other documentation relevant to such products or services. Trust and estate and wealth planning services are provided through Deutsche Bank Trust Company, N.A., Deutsche Bank Trust Company Delaware and Deutsche Bank National Trust Company. © 2013 Deutsche Asset & Wealth Management. All rights reserved. 017075 121913