

THE TOP 40 TAX PLANNING OPPORTUNITIES FOR 2025

Table of Contents

Chapter 1: Bracket Management Strategies.....	5
#1: Bracket Management	6
#2: Capital Gain Harvesting.....	14
#3: Harvesting Capital Losses.....	20
#4: Trusts as S Corporation Shareholders: ESBT vs. QSST.....	23
Chapter 2: Income Smoothing Strategies.....	26
#5: Substantial Sale Charitable Remainder Trust (CRT)	27
#6: Retirement Charitable Remainder Trust	31
#7: Roth IRA Conversions	36
#8: Oil and Gas Investments	41
#9: Two-Year Installment Sale Strategy	44
#10: Nonqualified Tax Deferred Annuities.....	48
#11: Borrowing from Permanent Life Insurance Policies.....	53
Chapter 3: Income Shifting Strategies	56
#12: Income Shifting Charitable Remainder Trust	57
#13: Family Limited Partnership (FLP)	62
Chapter 4: Reducing Taxable Income Strategies	67
#14: Tax-Aware Investing.....	68
#15 Incomplete Gift, Non-Grantor (ING) Trusts	74
#16: Captive Insurance Companies.....	77
Chapter 5: Specific Net Investment Income Tax Strategies.....	82
#17: Inter Vivos Charitable Lead Annuity Trust (CLAT)	83
#18: Grouping Business Activities to Create Material Participation and Avoid the NIIT	87
#19: Choice of Filing Status to Avoid the 3.8% NIIT	90
Chapter 6: Wealth Transfer Strategies	93
#20: Intra-Family Loans.....	94
#21: Grantor Retained Annuity Trust (GRAT).....	96
#22: Dynasty Trust.....	100
#23: IDGT Sale	103
#24: Domestic Asset Protection Trust (DAPT).....	106

#25: Spousal Limited Access Trusts	110
Chapter 7: IRC Section 199A Planning.....	114
#26: IRC § 199A Overview	115
#27: Managing IRC § 199A Limitation Amounts	119
#28: Choice of Entity Decision After the TCJA--Converting a Pass-Through Entity to a C Corporation.....	124
#29: Using Multiple Trusts to Enhance the Benefits of IRC § 199A	128
#30: Aggregating Trades or Businesses to Increase the § 199A Deduction	133
Chapter 8: Ten More Must Know Strategies.....	138
#31: Trust Decanting	139
#32: S-Election to Save Employment Taxes	146
#34: Trusts Named as IRA Beneficiaries	154
#35: Sale to an Intentionally Defective Grantor Trust (IDGT) with a Self-Cancelling Installment Note (SCIN) Hedge.....	163
#36: Qualified Small Business Stock	170
#37: Opportunity Zones	176
#38: Puerto Rico Tax Incentives	179
#39: Timing the NQSO Exercise Decision	182
#40: Cost Segregation	185