

The Ramifications of the Tax Cuts and Jobs Act on Corporations and Businesses

Location

Wanamaker Building
100 E. Penn Square
Philadelphia, PA 19107

10th Floor Suite 1010

Date & Time

Start Date: 06/04/2018

Start Time: 9:00 am

End Time: 1:15 pm

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Dennis Cohen and **Richard Silpe**, co-chairs of Cozen O'Connor's Tax Practice Group, will be moderating, and **Thomas Gallagher**, a member of the firm's Tax Practice Group, will be speaking at this event in Philadelphia. The most sweeping changes to the Internal Revenue Code since 1986 have just been enacted. The Tax Cuts and Jobs Act of 2017 affect taxation of virtually every type of business. This program is designed for anyone who is concerned with how the Act will affect themselves and their business clients.

Learn about some of the most important provisions dealing with:

Taxation of corporations and partnerships

- Reduction in corporate rate
- How important Act changes affect the structuring and pricing of M&A transactions
- Valuable new deduction for individual owners of pass-through businesses and REITs
- New rules limiting the deduction of interest in partnership and international context
- Tax accounting changes
- Focus on choice of business entity selection to take advantage of lower tax rates

International provisions — Far-reaching changes to U.S. international tax rules including:

- One time deemed repatriation tax
- Participation Exemptions System

- Current tax on global intangible low-taxed income
- Deduction for foreign-derived intangible income
- Modification of Subpart F regime
- Foreign branch income

Real Estate Developers and Investors

- Depreciation Changes
- Potential limitations on interest deductions
- Application of the new qualified business income deduction to real estate investors
- Carried interest changes

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