

Income Tax

Stinson's Income Tax practice provides a full array of federal and state tax services to public and private companies, nonprofit organizations, cooperatives and individuals.

Our income tax attorneys develop strategies and structures that enable clients to minimize tax costs while achieving their objectives. We work closely with the firm's corporate, financial services, mergers and acquisitions, and real estate attorneys in transactional matters and planning, to provide clients with favorable tax outcomes.

Our attorneys work extensively with C corporations as well as pass-through entities, including limited-liability companies (LLCs), partnerships and S corporations. We represent clients before the Internal Revenue Service (IRS), state and federal courts and administrative agencies.

Regarding tax controversies, we have successfully handled issues related to the active character of losses under the passive activity loss rules, asset valuation, built-in gain, intercompany debt, uniform capitalization, business valuation, reasonable compensation, character of income, reserves for bad debts, transferee liability, unreasonable accumulation of earnings and other assets, among many others.

CAPABILITIES

- Tax advice in mergers and divestitures, acquisitions, joint ventures, leveraged buyouts and related transactions.
- Tax planning in corporate structurings and restructurings, reorganizations and tax-motivated transactions.
- Tax-exempt financings and taxable financings, including original issue discount concepts.
- Pass-through entity planning, formation and preparation of related documentation for limited liability companies, limited liability partnerships, limited and general partnerships, joint ventures and S corporations.
- Planning for the formation and operation of new businesses, including consideration of the choice of entity.
- Real estate tax and transactional planning for real estate investment trusts (REITs), distressed real estate, like-kind exchanges, installment sales, and deferred like-kind exchanges.

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- Securitization of assets under the Real Estate Mortgage Investment Conduit (REMIC) rules or pursuant to the grantor trust rules and under the Financial Asset Securitization Investment Trust (FASIT) rules.
- Tax dispute work including representation of taxpayers before the U.S. Tax Court, state courts, and administrative levels of review within the Internal Revenue Service and state Departments of Revenue. Controversy work includes issues in income tax, sales and use tax, multistate apportionment, property (ad valorem) tax, franchise and privilege taxes.
- Executive compensation alternatives including incentive stock options, non-qualified stock options, rabbi trusts, restricted stock, stock appreciation rights, partnership equity and other compensatory plans.
- Tax-exempt entity formation and planning relating to tax-exempt status under federal and state law, property tax exemptions, unrelated business income tax issues and other tax considerations.
- General income tax planning for individuals that includes planning for and with pension and profit-sharing plan distributions, variable annuities, life insurance, investments and other issues.
- Using family limited partnerships and other entities to enhance the growth of family assets and reduce the tax burden of business interests on the estates of the senior generation.
- Tax planning for litigation settlements and judgments including structured settlements.

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RELATED CAPABILITIES

Tax, Trusts & Estates

Estate & Trust Litigation

Nonprofit Organizations, Charitable Planning & Foundations

NEWS

Redd Provides Analysis of In Terrorem Clauses in Wills and Trust Instruments in *The Practical Lawyer*

03.25.2024

Trusts & Estates Features Insight for Estate Planning Professionals in 2024 From Clary Redd

01.17.2024

Best Lawyers® Recognizes Stinson in "Best Law Firms" Report

11.02.2023

Steve Higgins Selected to 2023 Florida Rising Stars List

06.26.2023

Estate Planning Council of St. Louis Honors Redd with Distinguished Estate Planner of the Year Award

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Missouri's 100 Most Powerful Attorneys Includes Stinson Partners

12.19.2022

Clary Redd Discusses Treasury Department's Recent Proposal to Limit Tax Saving Opportunities in *Financial Planning*

05.17.2022

Charley Jensen, Clary Redd and Jay Simpson Named to Tax and Estate Planning "POWER LIST"

04.25.2022

Charley Jensen, Jay Simpson Named to Top 30 POWER List for Tax Attorneys by *Missouri Lawyers Weekly*

04.27.2021

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