

Navigating Intra-Family Transactions and Their Estate and Gift Tax Implications: Lessons from Estate of MacElhenny v. Commissioner

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In *Estate of MacElhenny v. Commissioner* (decided March 15, 2023), the United States Tax Court considered the deductibility of debts of a California estate—including whether the debts were bona fide, given family involvement in several complex transactions related to the debts. The Tax Court also examined gift tax deficiencies assessed by the IRS for the family recipients of discounted real estate.

Reading through this case, you'll find that the *Est. of MacElhenny* provides a few important estate planning considerations for estate planners and representatives, though none of them are necessarily novel.

For the full article:

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