Foster Garvey

Events

"Another Look at the Single Class of Stock Requirement Under Subchapter S," 85th New York University Institute on Federal Taxation (New York)

November 19, 2026

Larry Brant’s discussion at the 85th New York University Institute on Federal Taxation (IFT) will examine why the single-class-of-stock rules are far more intricate than they appear on the surface.

The basic rule is that an S corporation can only have one class of stock. For this purpose, voting stock and non-voting stock are permitted. The key to having just one class of stock is generally to make sure that all shares have identical rights to distribution and liquidation proceeds. While seemingly simple in concept, it can be extremely complex in application. The mystery that often comes into play is whether shares have identical rights to distribution and liquidation proceeds.

Larry will explore this issue in detail, including how to identify the problem, as well as a possible simple remedy to cure the problem if it arises.

This is the 85th anniversary of the IFT. This year's institute will solely be held in New York City. Plans are in the works to make it an extra special event.

For more information, visit the NYU School of Professional Studies IFT website.

Featured People

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