

[Events](#)

“Revisiting Choice of Entity in Light of Tax Changes on the Horizon,” OSCP A 2021 Northwest Federal Tax Conference

October 25, 2021 Virtual Event

The TCJA reduced the corporate income tax rate to a flat 21%, motivating many S corporations to consider converting to C corporations. With tax rate hikes looming on the horizon and significant changes to the Code anticipated, the S corporations that terminated their S elections, however, may soon find themselves desiring to regain S status. Likewise, depending upon the provisions of the soon to be enacted tax legislation, some S corporations may desire to obtain C corporation status.

Larry Brant’s presentation explores C to S and S to C conversions, including the potholes and obstacles that exist along the way such as the built-in-gains tax, LIFO recapture, excessive passive income, unreasonable compensation, personal holding company status, excessive accumulated earnings, and re-election time restrictions. Additionally, he will briefly explore leaving corporate solution altogether.

For more information about this program, visit the [OSCP A website](#).

Featured People

[Larry J. Brant](#)

[Principal|Portland](#)

[503.553.3114 larry.brant@foster.com](#)

Related Areas

- [Federal Tax](#)
- [State & Local Tax](#)
- [Tax](#)
- [Fund Formation, Compliance & Syndications](#)