

# **June 2025**

## **Farm and Ranch CLE in Santa Fe, NM**

### **Schedule**

#### **Day 1 - June 5, 2025**

**7:30 a.m. – Registration and Check-In**

**7:55 a.m.-8:00 a.m. – Introductions and Announcements**

**8:00 a.m.-9:15 a.m. – Federal Tax Update (Roger)**

This session includes discussion of important federal tax developments from the past year concerning court cases and IRS administrative pronouncements on such issues as income and deduction items; credits and tax administration; C corporations; S corporations; partnerships; and employment taxation.

**9:15 a.m.-9:40 a.m. – Time Value of Money and Taxes (Paul)**

Time value of money continues to be interwoven inside of the Internal Revenue Code, and in this session we will review the key concepts of time value of money and how they affect certain transactions that farmers normally incur.

**9:40 a.m.-9:55 a.m. - Morning Break**

**9:55 a.m.-10:20 a.m. –Excess (Residual) Fertilizer Supply (Update) (Paul)**

This session provides an update on claiming a deduction for residual fertilizer supply. The basic elements of qualifying for claiming the discussion will be discussed as well as current techniques being utilized by taxpayers. This session walks the practitioner through the proper procedure for documenting and claiming the deduction on the return.

**10:20 a.m.-10:45 a.m. – Taxation of Option Payments (Roger)**

This session looks at the application of the “open transaction doctrine” and how it might apply to various sale agreements that farm clients may enter into involving a portion of the land such as an option for an easement.

**10:45 a.m.-11:35 a.m. – Nontraditional Financing of Inputs; Equipment Leases (Paul)**

Farmers continue to use non-traditional financing of farm inputs from various non-banker lenders and supply companies. We review the economics of this financing and related tax issues. The session will also review the taxation of equipment leases.

**11:35 p.m.-Noon – Hobby Losses (Roger)**

One issue that the IRS does show audit activity on involves alleged hobby losses. Many of the challenges involve agricultural activities. This session goes through the rules, what the IRS looks for and how to operate an activity to avoid an IRS challenge.

**Noon – 12:45 p.m. – Luncheon**

**12:45 p.m.-1:35 p.m. – Depreciation Choices; Catch-Up Depreciation (Paul)**

This session will review the various depreciation choices available to farmers and the related issues with equipment trade-ins after TCJA. The session will also review the proper procedures for scrubbing a depreciation schedule and how to report that on the income tax return.

**1:35-2:00 p.m. – Involuntary Conversions (Roger)**

Utilizing the involuntary conversion rules can prove beneficial. This session discusses how the rules apply with disaster and eminent domain transactions, defines qualified replacement property, and also when it would not be beneficial to the taxpayer to use the rules.

**2:00 p.m. – 2:25 p.m. – Qualified Conservation Contributions (Paul)**

Syndicated conservation easements are on the IRS's dirty dozen list. However, qualified conservation easements for farmers continue to be a valuable tax consideration for farmers. In this session, we will review how these various contributions work and the related tax deduction available to farmers.

**2:25 p.m.-2:45 p.m. – Afternoon Break**

**2:45 p.m.- 4:00 p.m. – Potpourri (Roger and Paul)**

This fast-paced session looks at several recurring farm and ranch tax issues. Addressed, among other topics, will be tips for yearend tax planning; crop insurance deferral rules and strategies; and techniques to adjust AGI after year-end. The session will also review the issues with S corporations and provide an update on the self-employment taxation of LLCs.

**4:00 p.m. – Adjourn**

## **Day 2 – June 6, 2025**

**7:30 a.m. – Registration and Check-In**

**7:55 a.m.-8:00 a.m. – Introductions and announcements**

**8:00 a.m.-9:15 a.m. – Federal Estate and Gift Tax Update (Roger)**

This session includes discussion of important federal estate and gift tax developments from the past year concerning court cases and IRS administrative pronouncements on such issues involving gross estate calculations and deductions; retirement plans; trusts; and miscellaneous matters.

**9:15 a.m.-9:40 a.m. – Corporate Provided Meals and Lodging (Paul)**

This session will review the tax advantages of providing corporate meals and lodging for farming operations, and will also review the necessary steps to properly document this tax-free fringe benefit.

**9:40 a.m.-9:55 a.m. – Morning Break**

**9:55 a.m.-10:20 a.m. – Advantages of C Corporations (Paul)**

C corporations sometimes get a bum rap. This session will review some of the key tax advantages of a C corporation and will review how an S corporation may not provide the benefits anticipated.

**10:20 a.m.-10:45 a.m. – Retirement Plan Deductions for Farms (Roger)**

Retirement plan deductions may be an overlooked aspect of tax planning for farmers and ranchers. This session looks at self-employed retirement plans; defined benefit pension plans; traditional and Roth IRAs; and 401(k) plans.

**10:45 a.m.- 11:35 a.m. – Advantages of C Corporations; Corporate Redemptions (Paul)**

A redemption of an interest in farm partnership usually results in tax at ordinary rates. However, the redemption of C corporate stock results in favorable capital gains tax treatment. In this session, we will review the tips and traps on properly planning for a C corporation redemption.

**11:35-Noon – Medicaid Asset Protection Planning (Roger)**

This session will provide an overview of asset protection strategies for long-term health care. Topics covered include Medicaid eligibility requirements, asset limits, exempt and non-exempt assets, and legal tools such as trusts, annuities, and gifting strategies. Learn how to navigate the complex rules surrounding Medicaid planning, avoid common pitfalls, and ensure financial security while securing long-term care coverage.

**Noon-12:45 p.m. – Luncheon**

**12:45 p.m. – 1:35 p.m. – Estate Planning in 2025 (Roger)**

The results of the fall 2024 federal election suggest that it is unlikely that significant new taxes will be imposed on the wealthy. More tax cuts may be possible. What does all this mean to estate planning? What should practitioners tell clients to consider now? How is that advice different than the typical pre 2026 planning that has been the focus of many planning conversations? This session addresses these questions and others.

**1:35 p.m.-2:00 p.m. – I.R.C. §2032A Tips and Traps (Paul)**

In recent months, the limitation on the special use valuation reduction with an I.R.C. §2032A election has been proposed to be increased to \$14 million. In this session, we will review the key tips and traps associated with I.R.C. §2032A planning. This enhanced value reduction of land subject to the election is likely to become law in the near future and this session helps you plan for it now.

**2:00-2:25 p.m. – Distributions – Exit Strategies (Roger)**

During the operation of the farm business entity, it is often necessary or beneficial to distribute cash and property to the owners. The tax ramifications of this distribution can vary significantly based upon the chosen entity. This session examines the differences.

**2:25-2:45 - Afternoon Break**

**2:45 p.m.-4:00 p.m. – Potpourri (Roger and Paul)**

This session provides a Farm Bill Update and a discussion of FSA planning tips. Also addressed will be whether a crop share is inventory or IRD. In addition, discussion will address utilizing SWAP powers in Grantor Trusts, and the question will be asked “is this a Great Time for a GRAT?”

**4:00 p.m. - Adjourn**