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Eric Sloan Explores Disguised Sales and Disguised Fees for Services Change with Tax Notes

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Tax Notes

Partner Eric Sloan spoke to *Tax Notes* about a last-minute change in the tax bill passed recently by the U.S. House of Representatives, which clarifies whether partnership rules on disguised sales and disguised fees for services are self-executing. While unexpected, Eric noted that the change may have limited practical impact.

“The subchapter K crowd has essentially practiced as if the [section 707] rules were operative in the absence of regulations for a long time, largely because we have all believed that a court would use one of many routes to reach the same result, even if a court found the code provision not to be self-executing,” he told the publication.

Eric is a Co-Chair of our firm’s Tax Practice Group.

Read more (registration required): https://www.taxnotes.com/tax-notes-today-federal/budgets/house-adds-tweak-partnership-disguised-sale-statute/2025/05/27/7s7z7

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