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# Partner Eric Sloan Comments on IRS Related-Party Basis Shifting Ruling in Tax Notes

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Tax Notes

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Partner Eric Sloan, Co-Chair of our Tax Practice Group, told Tax Notes (subscription required) that he agrees with business groups urging the U.S. Internal Revenue Service (IRS) to withdraw a revenue ruling on related-party basis shifting. Eric said the IRS should pull Rev. Rul. 2024-14 because “it really isn’t an appropriate topic for a ruling — it’s not a ‘clean’ legal issue.” He added: “More importantly, though, its analysis is flawed, most notably by neglecting the all-important relevance analysis.”

## Related Capabilities

Tax

## Related People

Eric B. Sloan

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