

IRS: Valuation of Publicly Traded Stock Must Consider Anticipated Merger

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Boston Bar Association - Trust & Estates Section

On September 27, 2019, the Office of Chief Counsel (“OCC”) of the Internal Revenue Service released a Chief Counsel Advice Memorandum (the “Memorandum”) addressing the valuation of stock of a publicly traded corporation for gift tax purposes, where the corporation was engaged in negotiating a pending merger at the time of the gift. [Click here](#) to read more about the significance, impact, and opportunities that surround this Memorandum as well as learn about the potential considerations for donors.