FOR ESTATE, TAX, BUSINESS & REAL ESTATE COUNSEL

Your Client Is About to Lose a Third to Capital Gains

§453 Structured Installment Sale: defer the gain, keep the client happy

The client's problem

They sell a business, practice, or appreciated property and the **capital-gains tax lands all at once**, often the single biggest line item of the deal, and the thing they complain to *you* about at closing.

The §453 fix

Under **IRC §453**, structuring the sale as an installment sale spreads gain recognition (and the tax) across the payment years instead of one brutal spike. The deferred proceeds are paid on the contract schedule.

What the client gets

- Tax deferred over the installment period, not year one
- Lower effective rate by spreading income across brackets/years
- A scheduled payment stream set by contract
- Often more *net* in their pocket than a lump-sum-and-invest

Where it fits your practice

You handle	The §453 trigger
Business / M&A	Owner exits, sells the company
Estate / probate	Heirs sell the family business or farm
Real estate	Sale of appreciated property
Tax	Co-counsel on the deferral structure

HOW WE COORDINATE

You stay lead counsel and the trusted advisor. I build and place the structure; you keep the relationship. I make you look like the attorney who saved the client six figures.

THE REFERRAL MATH

One installment sale you refer can save your client **$100K+** in year-one tax. That's the kind of outcome that gets you re-hired and referred.

Send me one deal to structure. Test me on the next closing.

Hans Goldstein · Goldstein & Co. · §453 Structured Installment Sales · DTLA 213-656-1603

Educational marketing material, not legal or tax advice. §453 eligibility and treatment depend on deal specifics and should be confirmed with the client's tax counsel. Guarantees subject to the issuing carrier's claims-paying ability.