

Buy-Sell Tax Review Checklist

For educational and professional practitioner use. Use this workpaper to structure the question, preserve relevant facts and evidence, and support professional judgment.

Taxpayer / Entity	
Tax Year / Period	
Practitioner / Reviewer	
Prepared / Updated	

Agreement facts

- Identify owners, entity, triggering events, valuation mechanism, funding, and purchase obligation
- Determine redemption, cross-purchase, or hybrid structure

Tax analysis

- Review §§302/318 where relevant, basis consequences, partnership rules, insurance ownership/funding, §101(j), transfer-for-value, and Form 8925
- Review estate/gift valuation and §2703 implications
- Consider Connelly implications where corporate-owned life insurance funds a redemption

Coordination

- Flag legal drafting and insurance implementation for appropriate specialists
- Schedule periodic agreement/funding/valuation review

Practitioner conclusion / next action

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