

Consider a Monetized Installment Sale (“M453”) Transaction in Any of These Situations

Sale or Exchange Transactions Priced at \$500,000 or More:

A. When Something Is a Potential Deal-breaker

When something is a roadblock between a seller and a buyer, or among co-owners of an asset, sometimes S.Crow Collateral Corp.’s role as a dealer between or among them can enable S.Crow Collateral Corp. to accomplish what the parties cannot accomplish in their dealing directly with each other. That may be because of personal dynamics, or it may be because the dealer role brings to bear different rules, new flexibility and additional capacity for creative resolution.

B. When What’s to Be Sold Is a Capital Asset

- a business entity (corporation, limited liability company, partnership, whatever),
- a professional practice,
- real estate (whether held for business or investment purposes, or as a personal residence, or a fractional interest, or mineral rights, or whatever),
- contract rights (*e.g.*, franchise agreements, license agreements, long-term leases),
- art or antique collections, or
- aircraft, watercraft and classic automobiles which have increased in value, but
- not including sales by someone in the ordinary course of business as a dealer.

C. When One of These Mechanisms or Circumstances Pertains

- contract and transfer through ordinary closing procedures,
- assignment or through agent or power of attorney,
- auction, or
- deed or transfer under threat of, or in lieu of, condemnation, foreclosure or other proceeding, but
- not including listed securities which will be sold through an exchange.

D. When the Sale Will Be Between Related Parties

When the owner of a capital asset wants to transfer the asset to adult children to establish them in business and remove the asset from the parent’s estate, often an M453 transaction may enable the children to obtain financing for the deal, it may enable post-transaction support for the parent, and it may provide the best financial outcome for each.

E. When Taxes Are a Concern

- capital gain,
- cancellation of debt,
- depreciation recapture on real estate,
- expected failure of an exchange, or
- pre-payment of an existing installment debt owed to the taxpayer.