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From:
Sent: Wednesday, January 21, 2009 6:24 PM
To:
Cc:
Subject: RE: quick questions

Generally, the wage event occurs when the nonstatutory stock options are exercised and employment taxes apply to the spread. When the options are for stock in another company, (d)(1) may come into play as to who has the liability, but I also believe there is a RR on a related issue.

If options are bought back, wage event would occur at that time.

I'm copying on this response in case he wants to weigh in. He is primary contact here in on application of ET to stock/equity remuneration.