2004 Taxation Conference
November 3, 2004 - November 5, 2005 • Hilton Americas • Houston, TX
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Day 1 Morning

9:00 am In Houston Only 1.50 hrs	**Recent Federal Income Tax Developments** This session will outline significant court decisions, rulings and statutory and regulatory developments over the past twelve months. Martin J. McMahon Jr., University of Florida College of Law - Gainesville, FL Ira B. Shepard, Univ. Of Houston Law Ctr - Houston, TX
10:45 am In Houston Only 1.50 hrs	**Recent Federal Income Tax Developments (continued)** Martin J. McMahon Jr., University of Florida College of Law - Gainesville, FL Ira B. Shepard, Univ. Of Houston Law Ctr - Houston, TX

Day 1 Afternoon

12:15 pm In Houston Only 0.50 hr	**Washington Developments**
1:30 pm In Houston Only 1.00 hr	**Rethinking Tax Planning** Are low-rate dividends and enhanced savings incentives paradigm shifts or is Code instability the fundamental planning reality? Kenneth W. Gideon, Skadden Arps Slate Meagher & Flom LLP - Washington, DC
2:30 pm In Houston Only 1.25 hrs	**Taxable Corporate Acquisitions** A discussion and outline of key planning techniques and developments involving asset and stock acquisitions, including the election under Code Section 338(h)(10). C. Ronald Kalteyer, Locke, Liddell & Sapp LLP - Dallas, TX
4:00 pm In Houston Only 1.00 hr	**Hot Topics in International Tax** Recent developments in legislation, regulations, IRS guidance and treaties that involve international tax issues of importance to U.S. inbound and outbound transactions. N. Susan Stone, Baker & McKenzie LLP - Houston, TX

Day 2 Morning

8:30 am In Houston Only 1.00 hr	**TICS & Build to Suit Techniques under Section 1031** A discussion of the latest trends under Section 1031, including the use of tenancy-in-common arrangements as replacement property and techniques for structuring build-to-suit transactions. Bradley T. Borden, Washburn University School Of Law - Topeka, KS
9:30 am In Houston Only 1.25 hrs	**Creative Planning to Control Partnership Liability Allocations** The partnership liability allocation rules of Section 752 are frequently the key to achieving a tax-deferred transaction structure. Discussion of the latest cutting edge techniques, including capital account deficit restoration obligations, capital contribution obligations, bottom guarantees, and special considerations in limited liability companies. Blake D. Rubin, Arnold & Porter LLP - Washington, DC
11:00 am In Houston Only 1.25 hrs	**Compensation: Tax Planning Techniques, Reporting Considerations and New Developments** An outline of key developments and planning opportunities involving equity-based compensation; fringe benefits, deferred compensation, employment taxes, and information reporting. Mary B. Hevener, Baker & McKenzie LLP - Washington, DC

Day 2 Afternoon

12:15 pm In Houston Only 0.00 hr 0.50 hr ethics	**Circular 230 and the Office of Professional Responsibility** John C. Klotsche, Baker & McKenzie - Dallas, TX
1:30 pm In Houston Only 0.00 hr 2.00 hrs ethics	**Case Study: Professional Practice, from Inception through Examination and Appeals** A representative hypothetical will be used as the basis of discussion for attorney client privilege and work product protections; waiver of privileges and protections; tax shelter developments (civil); SBSE developments; choice of forum considerations and current developments in the civil area. Reid M. Huey, Office of Chief Counsel - Internal Reven - St. Paul, MN Charles J. Muller III, Strasburger & Price LLP - San Antonio, TX Emily A. Parker, Thompson & Knight LLP - Dallas, TX Moderator: Steven C. Salch, Fulbright & Jaworski L.L.P. - Houston, TX Otto L. Wheeler, Wheeler & Company, L.L.P. - Austin, TX

3:45 pm In Houston Only 0.00 hr 1.25 hrs ethics	**Consideration of Potential Criminal Exposure in the Hypothetical Tax Transaction** A panel discussion based upon a hypothetical tax motivated transaction. The topics addressed will include a discussion of tax shelter investigations being pursued by the IRS/DOJ; problems presented for the professional by the parallel movement of both criminal and civil tax issues (such as IRS exam, civil malpractice suits, grievances); Fifth Amendment privilege issues and waiver; prosecution theories for the pursuit of promoters, tax professionals and investors; current criminal tax developments relevant to the tax professional. Larry A. Campagna, Chamberlain Hrdlicka Et Al - Houston, TX Robert E. Davis, Hughes & Luce - Dallas, TX Emily A. Parker, Thompson & Knight LLP - Dallas, TX

Day 3 Morning

8:30 am In Houston Only 1.25 hrs	**Recent Developments Affecting Estate Planning** Recent cases, rulings and proposed regulations relating to valuation issues, marital deduction, community property, qualified plans and IRAs, life insurance, gifts, disclaimers, and other estate planning topics. Stanley M. Johanson, Vinson & Elkins LLP - Austin, TX
10:00 am In Houston Only 1.00 hr	**Family Limited Partnerships** Where we stand, with focus on status of Kimbell, Strangi, McCord, Thompson, and other cases in litigation stream as well as corrective actions with respect to existing FLPs. Stephen R. Akers, Bessemer Trust Co - Dallas, TX
11:00 am In Houston Only 1.00 hr	**Asset Protection** This session will discuss the asset protection benefits of traditional and cutting edge estate planning tools and techniques available to clients who do not want to utilize off shore trust planning. Santo Bisignano Jr., Bisignano & Harrison LLP - Dallas, TX

Day 3 Afternoon

12:00 pm In Houston Only 1.00 hr	**Tax Perspective** John E. "Buck" Chapoton, Brown Investment Advisory Inc - Washington, DC

1:15 pm In Houston Only 1.25 hrs	**When the Kids Don't Play Well Together: Tax-Free Entity Division in Family Business Succession Planning** Effective planning of an estate with a significant family business component is difficult in a dysfunctional second generation environment. This presentation will examine the necessary steps in a tax-free division and transfer of a family business in various entity forms and other estate assets among members of the dysfunctional second generation. Michael V. Bourland, Bourland, Wall & Wenzel, P.C. - Fort Worth, TX James M. Mincey Jr., Mincey-Carter, PC - Dallas, TX Marcus P. Johnson, Shannon Gracey Ratliff & Miller - Fort Worth, TX
2:45 pm In Houston Only 0.00 hr 1.00 hr ethics	**Estate Planning Workshop** This workshop will cover ethical issues in (i) multi-generational representation relating to family business succession planning, and (ii) asset protection, as well as hot-button issues stemming from recent cases and proposed regulations. Stephen R. Akers, Bessemer Trust Co - Dallas, TX Santo Bisignano Jr., Bisignano & Harrison LLP - Dallas, TX Michael V. Bourland, Bourland, Wall & Wenzel, P.C. - Fort Worth, TX Moderator: Stanley M. Johanson, Vinson & Elkins LLP - Austin, TX Marcus P. Johnson, Shannon Gracey Ratliff & Miller - Fort Worth, TX James M. Mincey Jr., Mincey-Carter, PC - Dallas, TX