UTCLE

THE UNIVERSITY OF TEXAS SCHOOL OF LAW

53rd Annual

TAXATION CONFERENCE

Earn up to 19.75 Hours of Credit Including 1.75 Hours of Ethics Credit

Specialization Expected for Tax Law, Estate Planning and Probate Law

November 2-4, 2005

Hyatt Regency on Town Lake

Austin, Texas

SPECIAL:

STANLEY M. JOHANSON'S ESTATE PLANNING WORKSHOP

FRIDAY, NOVEMBER 4

Video Replay: Estate Planning Nov. 30, 2005 • Cityplace Conference Center • Dallas

53RD ANNUAL TAXATION CONFERENCE

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WEDNESDAY MORNING

Presiding Officer: Jimmy Martens, Austin

7:30 a.m. **Registration Opens**

Includes continental breakfast.

8:20 a.m. **Welcoming Remarks**

8:30 a.m. 2.25 hrs

Recent Federal Income Tax Developments

The speakers will discuss significant court decisions, rulings, and statutory and regulatory developments over the past twelve months.

Martin J. McMahon, Jr., Gainesville, FL
Ira B. Shepard, Houston

10:45 a.m. **Break**

11:00 a.m. 1.25 hrs

Recent Federal Income Tax Developments (continued)

WEDNESDAY AFTERNOON

Presiding Officer: Robert J. Peroni, Austin

12:15 p.m. **Box Luncheon Presentation**

Included in registration fee.

Meet the Speakers .75 hr

Meet one-on-one with the day's speakers.

1:30 p.m. 1.00 hr

Selected Provisions of the Jobs Act

Mr. Evans will review important provisions of the Jobs Act of 2004, including Subchapter S changes, energy incentive provisions, changes to the rules on depreciation, the rules on repatriating earnings, changes in the international anti-deferral regimes and the foreign tax credit rules, and other miscellaneous provisions.

Thomas L. Evans, Washington, D.C.

2:30 p.m. **Break**

2:45 p.m. 1.00 hr

Sea Change in Taxation of Deferred Compensation—Section 409A

A whole new set of nonqualified deferred compensation rules are in place. New constructive receipt and funding rules, grandfathered plans and 2005 transition will be discussed.

Donald O. Jansen, Houston

3:45 p.m. 1.00 hr

The New Section 199 Manufacturing Deduction: Planning Pitfalls and Opportunities

This presentation will provide participants with a working knowledge of the scope and operation of the deduction under Section 199 in light of the administrative guidance issued by the government. This presentation will highlight topics and issues under Section 199 that remain unclear or potentially problematic, the taxpayers that may be affected by them, and potential planning opportunities and pitfalls of which businesses and tax advisors should be aware when considering the impact of the deduction under Section 199.

Beth M. Benko, Washington, D.C.

4:45 p.m. **Adjourn**

THURSDAY MORNING

Presiding Officer:

Jimmy Martens, Austin

8:45 a.m. 1.00 hr

How Changes to the Texas Business Organization Code Affect Choice of Entity

This presentation will examine the Texas Business Organization Code and how choice of entity decisions will be affected.

Carol Glendenning, Dallas

9:45 a.m. 1.00 hr

New Developments in the Corporate Organization and Reorganization Areas

Mr. Pari will discuss current tax issues related to structuring and restructuring corporate entities.

Joseph M. Pari, Washington, D.C.

10:45 a.m. **Break**

11:00 a.m. 1.00 hr

Partnerships

Recent legislative and regulatory developments: An in-depth discussion of key recent changes including the proposed regulations on disguised sales of partnership interests, partnership equity for services, mandatory basis adjustments and other important developments.

Andrea Macintosh Whiteway, Washington, D.C.

12:00 p.m. **Box Luncheon Presentation**

Included in registration fee.

Schemes, Shelters and Abusive Transactions .75 hr including .75 hr ethics

Why Today's Thoughtful Tax Advisors Should Tell Their Clients to "Just Say No."

Donald L. Korb, Chief Counsel, IRS
Washington, D.C.

THURSDAY AFTERNOON

Presiding Officer:
Elsbeth T. Peshel, Austin

1:30 p.m. 1.00 hr

New Rules of Practice before the IRS

Circular 230 will affect all tax practitioners. This presentation will address the practical do's and don'ts.

Richard M. Lipton, Chicago, IL

2:30 p.m. 1.00 hr

Tax Shelters

An analysis of recent tax shelter litigation updates and procedural changes.

David Aughtry, Atlanta, GA

3:30 p.m. **Adjourn**

FRIDAY: ESTATE PLANNING WORKSHOP

Presiding Officer:
Stanley M. Johanson, Austin

8:30 a.m. 1.25 hrs

Recent Developments Affecting Estate Planning—Statutory and Nonstatutory

Recent cases, ruling 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, Austin

9:45 a.m. **Break**

10:00 a.m. 1.00 hr

Anatomy of the Federal Gift Tax Return (Form 709), including a Review of the GST Automatic Allocation Rules and Gift Splitting Provisions

This session will focus on the overhaul of the federal gift (and generation-skipping transfer) tax return. It includes various sample returns that illustrate basic concepts and complicated nuances in terms of the unwary in reporting certain gifts. The presentation also includes illustrations on how to report gifts made to generation-skipping transfer tax trusts and how to elect out of the automatic allocation of the generation-skipping transfer tax exemption pursuant to the final regulations, as well as an in-depth analysis on gift splitting.

David Pratt, Boca Raton, FL

11:00 a.m. **1.00 hr**

The UPIA Twins—Advising Non-Corporate Trustees as to Uniform Prudent Investor Act and Uniform Principal & Income Act

Topics include the challenges faced by individual trustees in (i) choosing proper "risk and return" objectives, (ii) adequately diversifying investments, (iii) exercising the "power to adjust" between income and principal, and (iv) dealing with the new Treasury regulation defining "income."

C. Boone Schwartzel, Houston

12:00 p.m. **Box Luncheon Presentation**

Included in registration fee.

Meet the Speakers

1.25 hrs including 1.00 hr ethics

Meet one-on-one with today's speakers regarding estate planning issues. Ethical issues will also be covered.

Moderator: Stanley M. Johanson, Austin
Alex W. Howard, Houston
Lou Mezzullo, Richmond
David Pratt, Boca Raton, FL
C. Boone Schwartzel, Houston

1:15 p.m. **Break**

1:30 p.m. **1.00 hr**

Valuation Issues in Estate Planning

This presentation will review the most pressing valuation issues facing practitioners today and how planners and appraisers can work together to achieve the best results for the client. Recent court decisions will be discussed from an appraiser's viewpoint, along with the latest methods of responding to those issues.

Alex W. Howard, Houston

2:30 p.m. **1.25 hrs**

FLPs and Defined Value Clauses—Where Do We Stand?

An update on the current status of Family Limited Partnerships and Defined Value Clauses, including a detailed analysis of recent cases involving both issues.

Louis A. Mezzullo, Richmond, VA

3:45 p.m. **Adjourn**

Online: www.utcle.org

REGISTRATION FOR TX05

Mail this registration form to:
The University of Texas School of Law, Attn. TX05
P.O. Box 7759, Austin, TX 78713-7759 ***or fax a copy to: (512) 475-6876***

PLEASE PRINT CLEARLY

Bar Card# ______ ❑ TX ❑ Other State: ______ ❑ N/A

Name [Mr. / Ms.] ______

Firm ______

Address ______

City ______ State ______ Zip ______

Telephone ______ Fax ______

Registrant's Email **(required)** ______

Assistant's Email **(optional)** ______

Invoices, confirmations and receipts are emailed to these addresses.

REGISTRATION

Includes Course Binder and Lunches
****For Group Registration or Special IRS rate please contact UTCLE at 512-475-6700.****

FULL 3-DAY CONFERENCE

❑ Early Registration Fee due by Wed. Oct. 26, 2005 .... $575.00
❑ Registration Fee after Wed. Oct. 26, 2005 .... $625.00

ONE-DAY ESTATE PLANNING ONLY

❑ Early Registration Fee due by Wed. Oct. 26, 2005 .... $250.00
❑ Registration Fee after Wed. Oct. 26, 2005 .... $300.00

VIDEO REPLAY (ESTATE PLANNING ONLY): DALLAS, NOVEMBER 30, 2005

❑ Video Replay Registration Fee $195.00

CONFERENCE PUBLICATIONS AND MEDIA

Allow 2–4 weeks from conference date for delivery.

❑ Course Binder – Full Conference $275.00
Note: Conference registration includes Course Binder.
❑ Course Binder – Estate Planning Only $125.00
❑ Audio CD Set – Full Conference $200.00
❑ Audio CD Set – Estate Planning Only $125.00
❑ eBinder on CD (PDF format) – Full Conference Only .... $225.00/$75.00
($225 purchased alone, $75 with registration or purchase of Course Binder, Audio CD or DVD Set)
❑ DVD Set – Estate Planning Only $175.00

IN-HOUSE CLE: Bring the conference in-house and learn at your convenience.

Allow 2–4 weeks from conference date for delivery.

❑ Full Conference: In-House CLE for 2—*Includes 2 Course Binders, Audio CD Set* ... $850.00
______ Add participants (includes Course Binders) for $200 each .... $______
❑ Estate Planning Only: In-House CLE for 2—*Includes 2 Course Binders, DVD Set* ... $500.00
______ Add participants (includes Course Binders) for $140 each .... $______

TOTAL ENCLOSED .... $______

METHOD OF PAYMENT

❑ Check (make checks payable to: **The University of Texas at Austin**)
❑ VISA or ❑ Mastercard (sorry, no AMEX or Discover)

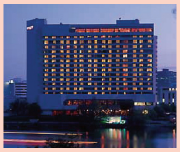
Card # ☐☐☐☐ - ☐☐☐☐ - ☐☐☐☐ - ☐☐☐☐

X______ ☐☐ / ☐☐
Authorized Signature Exp. Date (mm/yy)

AUSTIN

November 2-4, 2005

CONFERENCE LOCATION



Hyatt Regency on Town Lake

208 Barton Springs
Austin, TX 78704
512-477-1234 or 800-233-1234

Special group rate: $140
(subject to availability)
good through October 10, 2005

Parking: $4.00 self-parking
(subject to change)

KEY DATES
Registration & Cancellation

October 26, 2005, 5 p.m.
•last day for early registration
add $50 for registrations received after this time

October 28, 2005, 5 p.m.
•last day for full refund

October 31, 2005, 5 p.m.
•last day for partial refunds
$50 processing fee applied

November 2, 2005
•conference begins at 8:30 a.m.

MCLE

This course has been approved for Minimum Continuing Legal Education credit by the State Bar of Texas Committee on MCLE in the amount of 19.75 hours, of which 1.75 credit hours will apply to legal ethics/professional responsibility credit.

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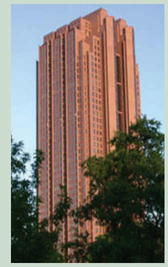
DALLAS

Video Replay
Estate Planning Only
November 30, 2005



Cityplace Conference Center

2711 N. Haskell St.
Dallas, TX 75204
214-828-7050

$195 Registration Fee

Online: www.utcle.org

ABOUT THE COVER

"Golden Tree at Occum Pond," oil on canvas, is by Laurel Daniel.

For more information, contact the Davis Gallery at 512-477-4929 or see www.davisgalleryaustin.com

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School of Law

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