

**66<sup>th</sup> Annual Taxation Conference**  
**November 14-15, 2018 • AT&T Conference Center • Austin, TX**

**Wednesday Morning, Nov. 14, 2018**

**Presiding Officer:**

**Robert D. Probasco**, Texas A&M University School of Law - Fort Worth, TX

7:30 am	<b>Registration Opens</b> Includes continental breakfast.
8:20 am	<b>Welcoming Remarks</b>
8:30 am 2.00 hrs	<b>Recent Developments in Federal Income Taxation</b> Review significant court decisions, rulings, and statutory and regulatory developments of the past year. Bruce A. McGovern, South Texas College of Law Houston - Houston, TX
10:30 am	<b>Break</b>
10:45 am 1.00 hr	<b>Texas State and Local Tax: New Developments</b> Learn about important new developments in the Texas franchise tax and sales tax laws that affect your tax compliance and tax planning practices. Examine recent court cases and policies affecting the franchise tax COGS calculation, as well as the <i>South Dakota v. Wayfair</i> decision and how it affects businesses that sell across state lines. James F. Martens, Martens, Todd, Leonard & Ahlrich - Austin, TX
11:45 am	<b>Pick Up Lunch</b> Included in registration.

**Wednesday Afternoon, Nov. 14, 2018**

**Presiding Officer:**

**Maxine Aaronson**, Attorney at Law - Dallas, TX

**LUNCHEON PRESENTATION**

12:05 pm 1.00 hr	<b>Perspective on the Tax Legislative Process</b> Get a behind the scenes look at the Tax Cuts and Jobs Act, focusing on how specific provisions were enacted and the intent behind the provisions. Christopher Hanna, Southern Methodist University Dedman School of Law - Dallas, TX
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1:05 pm	<b>Break</b>
1:20 pm 1.00 hr	<p><b>Taxation of Bitcoin, its Progeny and Derivatives: Coin Ex Machina</b></p> <p>Bitcoin and other cryptocurrencies, along with Initial Coin Offerings and tokens has continued to grow after becoming the focus of many last year. Review a basic explanation of blockchain and what a cryptocurrency is, and get an overview of federal income tax guidance and important tax questions that remain.</p> <p>Stevie D. Conlon, Wolters Kluwer - Chicago, IL</p>
2:20 pm 1.00 hr	<p><b>Understanding the Benefits of the New Section 199A Deduction</b></p> <p>Cut through the byzantine complexity of Section 199A to understand the Section's benefits and who gets it, and explore the guardrails that limit the category of owners and the types of income that qualify for the benefit and what we know regarding Treasury guidance.</p> <p>William Paul Bowers, Norton Rose Fulbright - Dallas, TX</p>
3:20 pm	<b>Break</b>
3:30 pm 1.00 hr	<p><b>Rock, Paper, Scissors? Choice of Entity After Tax Reform</b></p> <p>The Tax Cuts and Jobs Act of 2017 changed the tax treatment of business entities, including a reduction in the corporate rate and a new deduction for partners, and brought new considerations into play when choosing the form of doing business for your clients. Hear about the factors that may influence your selection now, when and why pass-through entities may still be the right choice, and how and when multi-entity structures may be useful.</p> <p>Barbara Spudis de Marigny, Orrick, Herrington &amp; Sutcliffe LLP - Houston, TX</p>
4:30 pm	<b>Adjourn</b>

## Thursday Morning, Nov. 15, 2018

### Presiding Officer:

**Catherine C. Scheid**, Attorney at Law - Houston, TX

7:30 am	<p><b>Conference Room Opens</b></p> <p>Includes continental breakfast.</p>
8:30 am 1.00 hr 0.50 hr ethics	<p><b>Partnership Audit Update</b></p> <p>Explore the latest developments and current status of the new partnership audit rules, as well as tips, traps and trends in drafting partnership and LLC agreement provisions addressing these rules, and learn how to successfully navigate issues in drafting such provisions, including how to determine who the client is and how to address potential conflicts of interest among partners.</p> <p>Brandon Bloom, Thompson &amp; Knight LLP - Dallas, TX Mary A. McNulty, Thompson &amp; Knight LLP - Dallas, TX</p>

9:30 am 1.00 hr	<p><b>Structuring Business Transactions After the Tax Cuts and Jobs Act</b></p> <p>Examine the impact of the Tax Cuts and Jobs Act on mergers and acquisitions, including the effect of new tax rates, expanded bonus depreciation, and new limitations on interest deductions.</p> <p>Michael P. Bresson, Baker Botts L.L.P. - Houston, TX</p>
10:30 am	<b>Break</b>
10:45 am 1.00 hr	<p><b>International Changes</b></p> <p>The international tax arena was significantly changed in 2017 with the Tax Cuts and Jobs Act, including an expansion of its reach into purely domestic transactions. Discuss these changes, and identify the key issues they raise for practitioners.</p> <p>Bret Wells, University of Houston Law Center - Houston, TX</p>
11:45 am	<b>Break</b>

## Thursday Afternoon, Nov. 15, 2018

### Presiding Officer:

**Patrick L. O'Daniel**, Norton Rose Fulbright - Austin, TX

### LUNCHEON PRESENTATION

	<p><b>Thank You to Our Luncheon Sponsor</b> <b>Branscomb   PC</b></p>
12:05 pm 1.00 hr ethics	<p><b>Ethics Jeopardy</b></p> <p>Enjoy an hour of interactive study of numerous ethics decisions and opinions, illustrated with fact situations, and challenging the audience to make the right ethical choice.</p> <p>Claude E. Ducloux, Attorney at Law - Austin, TX</p>
1:05 pm	<b>Break</b>
1:20 pm 1.00 hr	<p><b>The Gig Economy</b></p> <p>Explore the effects of the sharing economy on the traditional employment model as companies use technology to connect providers and end-users in novel ways and individual providers increasingly view themselves as entrepreneurs with their own business aspirations. Specific topics include the scope of the limitations of the employee/contractor classification system, the use of arbitration agreements as a response to judicial second-guessing, the scope of an employee's fiduciary duty, the ownership of employee inventions, and some of the potential consequences associated with replacing the traditional employment model with individually-defined, market-driven, peer-to-peer business relationships.</p> <p>Jason Boulette, Boulette Golden &amp; Marin L.L.P. - Austin, TX</p>

<p>2:20 pm 1.00 hr</p>	<p><b>Exempt Organizations Update</b></p> <p>Learn how tax reform and other current developments have directly impacted tax-exempt organizations.</p> <p>Jonathan S. Blum, Polsinelli PC - Dallas, TX</p>
<p>3:20 pm</p>	<p><b>Break</b></p>
<p>3:30 pm 1.00 hr</p>	<p><b>Putting It On and Taking It Off: Managing Tax Basis Today (For Tomorrow)</b></p> <p>“Tax Reform” has arrived, and the importance of the management and creation of tax basis - and the opportunities surrounding it - have never been greater. Examine the innovative tax basis management techniques that strip, shift, create, concentrate, and maximize basis where it can be of most benefit to taxpayers, including: (1) upstream planning and powers of appointment to create basis; (2) maximizing and multiplying the “step-up” in basis; (3) the upside of leverage; (4) partnership planning to move basis to where you want it; (5) novel uses of grantor trusts and disregarded entities in basis management; (6) how to “base-up” foreign assets for U.S. taxpayers; and (7) planning that benefits charity while capturing new basis for the family.</p> <p>Paul S. Lee, Northern Trust - New York, NY</p>
<p>4:30 pm</p>	<p><b>Adjourn</b></p>