UT LAW CLE | THE UNIVERSITY OF TEXAS | TEXASLAW

73RD ANNUAL

TAXATION CONFERENCE

December 3–4, 2025

AT&T Conference Center ▪ Austin, Texas

Live Webcast December 3–4

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Specialization Credit Expected for: Estate Planning and Probate Law, and Tax Law
NASBA and CPE Credit Approved for 17.40 Hours

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Times listed are in Central Time

WEDNESDAY MORNING, DEC. 3, 2025

Presiding Officer:
Craig M. Bergez, Porter Hedges LLP, Houston, TX

7:30 a.m. **Registration Opens**
Includes continental breakfast.

8:30 a.m. **Welcoming Remarks**

8:45 a.m. 1.00 hr

Advanced Section 1031 Problems

Current strategies for addressing the most challenging problems when planning for and structuring Section 1031 transactions, including partnership split ups, exchanges of underwater properties, and a comparison of the pros and cons of drop and swaps versus Delaware Statutory Trusts.

Todd Keator, Deloitte Tax LLP, Dallas, TX

9:45 a.m. 1.00 hr

Startup Financing: The Tax Aspects of SAFEs and Convertible Notes

Startup companies often need to raise capital between priced financing rounds. Doing so by entering into convertible notes or a Simple Agreement for Future Equity ("SAFE") is popular, but comes with substantial uncertainty regarding tax treatment and outcomes. This presentation covers common structures for SAFEs and convertible notes, key tax considerations, strategies to mitigate adverse outcomes, and other related matters.

Lesley P. Adamo, Lowenstein Sandler LLP, New York, NY
Daniel Mayo, Withum, Red Bank, NJ

10:45 a.m. **15-Minute Break**

11:00 a.m. 1.00 hr

Taxation of Cryptocurrency and Digital Assets

A review of the tax considerations and concerns associated with acquiring, holding, and transacting in cryptocurrency and digital assets.

Joshua Smeltzer, Gray Reed, Dallas, TX

12:00 p.m. **Pick Up Lunch**
Included in registration.

WEDNESDAY AFTERNOON

Presiding Officer:
Jaime Vasquez, Chamberlain, Hrdlicka, White, Williams & Aughtry, San Antonio, TX

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LUNCHEON PRESENTATION

12:30 p.m. 1.00 hr

Federal Tax Legislative Update

Hear about the current tax policy landscape, including recently enacted legislation and the prospects for additional legislation.

Marc J. Gerson, Miller & Chevalier Chartered, Washington, DC

1:30 p.m. **15-Minute Break**

1:45 p.m. 1.00 hr

Into the Depths of Grayness: Navigating State Income Taxation of Nonresident Individuals

Under well-established constitutional principles, states are allowed to tax resident taxpayers on all of their income, wherever derived, whereas nonresident taxpayers are subject to tax only on their income derived from sources in the nonresident state. But it's not as simple as that. The scope of nonresident taxation can be surprisingly broad. Address a number of potential challenges that nonresident taxpayers face.

Debra Silverman Herman, Hodgson Russ LLP, New York, NY

2:45 p.m. 1.00 hr ethic

What You Need to Know About the IRS Office of Professional Responsibility and Circular 230

Join Sharyn Fisk, the former Director of the IRS Office of Professional Responsibility, for an insider's view of OPR, including a discussion of recent developments, current trends, and how these changes will affect your practice.

Sharyn Fisk, Cal Poly Pomona, Los Angeles, CA

3:45 p.m. **15-Minute Break**

4:00 p.m. 1.00 hr

Partnership Taxation: New Rules Governing the Allocation of Debt Among Partners

Discuss recently issued final regulations regarding the allocation of debt among partners, including the changes made to the core rules governing recourse liabilities.

Mark Melton, Holland & Knight, Dallas, TX

5:00 p.m. **Adjourn**

MEET THE SPEAKERS RECEPTION

5:00 p.m. – 6:00 p.m.

Join us for drinks and hors d'oeuvres with program faculty and attendees.

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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 14.50 hours, of which 1.50 credit hours will apply to legal ethics/professional responsibility credit. The University of Texas School of Law is a State Bar of California approved MCLE provider (#1944), and an Oklahoma Bar Association MCLE presumptively-approved provider (#169).

THURSDAY MORNING, DEC. 4, 2025

Presiding Officer:
Michael L. Cook, Cook Brooks Johnson PLLC, Austin, TX

8:00 a.m. **Registration Opens**
Includes continental breakfast.

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Holland & Knight

8:30 a.m. 1.00 hr

Recent Developments

A review of significant court decisions, rulings, and statutory and regulatory developments from the past year.

Cassady V. Brewer, Carlton Fields, P.A., Atlanta, GA

9:30 a.m. 1.00 hr

Texas Tax Update

An update on Texas tax cases, new legislation, and rulings from the past year.

Karey Barton, KPMG, Austin, TX

10:30 a.m. **15-Minute Break**

10:45 a.m. 1.00 hr

What to Do With All the Data? Substantiating Tax Positions in the Face of Tidal Waves of Data

In 2025, daily data creation is projected to increase to 495.89 million terabytes, with annual data generation reaching 181 zettabytes. Data is created through every digital process – electronic transactions, smart phones, social media, and live video feeds. All of this is "big data." Explore how the rise in big data has revolutionized interactions and the exchange of information between taxpayers and tax authorities, and how to best advocate for your client in the Digital Age.

Melissa L. Wiley, Kostelanetz LLP, Washington, DC

11:45 a.m. **Pick Up Lunch**
Included in registration.

THURSDAY AFTERNOON

Presiding Officer:
Joshua Smeltzer, Gray Reed, Dallas, TX

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LUNCHEON PRESENTATION

12:15 p.m. 1.00 hr

How the IRS is Using AI and Other Advanced Tools to Improve Compliance and Increase Efficiency

Former IRS Commissioner Charles P. Rettig will discuss how the IRS is leveraging artificial intelligence and sophisticated data analytics to curtail abuse, drive innovation, and increase efficiency at all levels of the IRS.

Charles P. Rettig, Chamberlain Hrdlicka, Los Angeles, CA

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

1:30 p.m. 1.00 hr | 0.50 hr ethics

Responding to Administrative Summonses and Grand Jury Subpoenas

Learn best practices for minimizing adverse consequences to your client's business and personal life when faced with one of these investigative tools. Explore what to do both before and after an IRS Special Agent shows up with a summons or grand jury subpoena; the ethical implications surrounding representing a client who has received one of these notices, and responding when one of these documents has been issued to the client's business, related parties, and third party contacts.

Guinevere M. Moore, Moore Tax Law Group, Chicago, IL
R. Damon Rowe, Meadows, Collier, Reed, Cousins, Crouch & Ungerman, L.L.P., Dallas, TX

2:30 p.m. 1.00 hr

You Can't Always Get What You Want… But You Can Try Sometimes: The Latest Tax Court Jurisdictional Disputes and Other Rolling Topics

Tax Court litigation continues to evolve. Discuss challenges created by recent developments including the effect of *Jarkesy v. SEC* on penalty assessments and the National Tapayer Advocate's recent recommendations to subject assessable penalties to the deficiency procedures and to extend the Court's jurisdiction to refund cases.

Michel R. Stein, Hochman Salkin Toscher Perez P.C., Beverly Hills, CA

3:30 p.m. **15-Minute Break**

3:45 p.m. 1.50 hrs

Refund Claims: A Field Guide

A practical guide to the rules, strategies, and best practices for handling a refund claim with an emphasis on avoiding traps for the unwary. Address the administrative prerequisites to filing suit, choice of forum, the variance doctrine, the full payment rule, offsets, abatements, statutes of limitations, and other common pitfalls.

Michael W. May, Department of Justice, Dallas, TX
Shawn O'Brien, McDermott Will & Schulte, Houston, TX

5:15 p.m. **Adjourn**

NASBA

The University of Texas School of Law is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be submitted to the National Registry of CPE Sponsors through its website: www.nasbaregistry.org.

Program Level: Advanced

Field of Study: Taxes

Delivery Method: Group Live and Group Internet Based

CPE Credit: Up to 17.40 hours (expected)

Prerequisites: Participants should have a solid understanding of federal and state tax principles and prior experience in tax planning, compliance, or controversy. The program is designed for experienced tax professionals, including CPAs, attorneys, and financial advisors who regularly work with complex tax matters.

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We are here to support our community. Information and updates regarding our in-person conferences and live webcasts will be posted at www.utcle.org.

In addition, we continue to offer multiple educational opportunities online—both live and on-demand—by bringing practitioners together virtually. We are fortunate to serve so many of you who strive for excellence in the practice of law.

HOW TO REGISTER

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The University of Texas
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Questions? 512.475.6700

If you have dietary requirements or would like to request accommodations under the ADA, please contact Customer Service at 512.475.6700 or service@utcle.org at least 10 days prior to the conference.

REGISTRATION BENEFITS

Comprehensive Course Materials: Access course materials in "Your Briefcase" approximately 48 hours before the live event, and enjoy unlimited access to the final, complete course materials – downloadable PDFs of papers and slides.

Accredited eConference: Complimentary access to the eConference – with papers, slides, and video – accredited for one year in both TX and CA are available in "Your Briefcase" 6–8 weeks after the event.

TX MCLE Credit Reporting: UT Law CLE can report credit on your behalf directly to the State Bar of Texas. Track the Texas MCLE credit reported on your behalf at "Your Account" after you've logged in at www.utcle.org.

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Includes Electronic Course Binder Download (PDF) in "Your Briefcase." Special group registration rates available, including those for IRS employees. Call 512.475.6700.

❑ Live, In-Person Event Registration . . . . . $695 | $795 after November 19
❑ Live Webcast Registration $795

Printed and Shipped Binder with Registration (Shipping Included) – Available for order through Thursday, December 4, 2025
Please note that the printed binder will arrive 2–3 weeks after the conclusion of the live event. Delivery to P.O. boxes is not permitted. Binders will not be distributed on-site.

❑ Printed and Shipped Course Binder $102.84 ($95*)

Webcast Add-on
Register for the in-person conference and add on the webcast format for attendance flexibility.

❑ Webcast Add-on $100

TOTAL EVENT REGISTRATION $ _____

FIRST AND SECOND YEAR ATTORNEYS MAY ATTEND FOR JUST $195! CALL 512.475.6700 TO REGISTER.

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eConference – For Texas and California MCLE Credit
Includes Electronic Course Binder Download (PDF) and program video/audio. Available 6-8 weeks after live event. Hours may vary depending on actual event runtime and approved content.

❑ Individual eConference $795

Post-Course Binder – For Research and Self-Study
Comprehensive binder with papers and slides, available for delivery 4–6 weeks after live event.

❑ Electronic Post-Course Download (PDF) $319.34 ($295*)
❑ Printed Post-Course Binder $373.46 ($345*)

TOTAL POST-CONFERENCE PRODUCTS $ _____

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❑ Check (make check payable to The University of Texas at Austin)
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December 3–4, 2025

CONFERENCE LOCATION

AT&T Conference Center
The University of Texas at Austin
1900 University Avenue
Austin, TX 78705
877.744.8822 (reservations)

Special Room Rate: $204
good through November 2, 2025
reference "UT Taxation and Estate Planning Conference"
(subject to availability)

Parking:
Please visit www.utcle.org/conferences/TX25 for daily and overnight rates

KEY DATES

November 19, 2025
Last day for regular registration rates

November 21, 2025
Last day for full refund cancellation

November 24, 2025
Last day for partial refund cancellation
$50 processing fee applied

December 3, 8:30 a.m., CT
Conference begins

December 4, 2025
Last day to order a printed and shipped course binder with in-person or webcast conference registration.

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REASONS TO ATTEND

UT Law CLE's **73rd Annual Taxation Conference** presents the expertise and in-depth analysis essential to understanding where tax law is, where it came from, and where it is going. With a renowned slate of regional and national speakers, the conference is a must attend event for those looking to keep current amidst a dramatically changing tax landscape.

We're continuing the 2-day agenda format from last year! The topics will be grouped according to the subject matter and each day will have a cohesive theme. Join us on Wednesday: Focus on Business Planning and Thursday: Focus on Tax Controversy.

Continue Friday with Professor Stanley M. Johanson's popular Estate Planning Workshop offering lively discussion, practical advice, and updates.

Highlights and Learning Outcomes:

- Gain insights into recent federal and state tax legislative, regulatory, and judicial developments and their implications for tax planning and compliance.
- Learn how to apply current IRS guidance and best practices to the taxation of cryptocurrency, digital assets, and data-driven substantiation of tax positions.
- Assess ethical considerations and professional responsibilities under Circular 230 and IRS enforcement procedures, including administrative summonses and grand jury subpoenas.
- Develop strategies for handling refund claims, including navigating procedural requirements, forum selection, and common pitfalls in litigation.
- Integrate insights from expert practitioners to enhance tax advisory services and advocacy in a rapidly evolving regulatory environment.