

70TH ANNUAL
TAXATION CONFERENCE

Day 1: Focus on Controversy

Wednesday, November 30, 2022

DoubleTree by Hilton Hotel Austin ■ Austin, Texas

 Also Available as a Live Webcast – November 30

Earn up to 7.50 Hours of Credit Including 2.75 Hours of Ethics Credit
MCLE Credit Approved in TX, CA, OK, and PA (Hours Vary By Jurisdiction)
Specialization Credit Approved for Estate Planning and Probate Law and Tax Law
TX and National Accounting CPE and Certified Financial Planner (CFP) Credit Available



70TH ANNUAL
TAXATION CONFERENCE

Day 2: Focus on Business Transactions

Thursday, December 1, 2022

DoubleTree by Hilton Hotel Austin ■ Austin, Texas

 Also Available as a Live Webcast – December 1

Earn up to 7.50 Hours of Credit Including 1.50 Hours of Ethics Credit
MCLE Credit Approved in TX, CA, OK, and PA (Hours Vary By Jurisdiction)
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TX and National Accounting CPE and Certified Financial Planner (CFP) Credit Available

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NASBA Credit Available for In-Person Conference Only

Times listed are in Central Time

WEDNESDAY MORNING, NOV. 30, 2022

Presiding Officer:

T. Charles Parr III, ABIP, P.C.,
San Antonio, TX

7:30 a.m. Registration Opens

Includes continental breakfast.

8:20 a.m. Welcoming Remarks

8:30 a.m. 2.00 hrs

Recent Developments

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 a.m. 15-Minute Break

10:45 a.m. .50 hr

Texas Taxes: Recent Developments

An experienced trial attorney specializing in Texas taxes covers the new laws for challenging tax assessments in state court, research incentive issues, oilfield services audit policy changes, franchise tax apportionment issues, local sales tax sourcing for internet sales, and more.

Lacy Leonard, Martens, Todd, & Leonard, Austin, TX

11:15 a.m. 1.00 hr | .25 hr ethics

Multistate SALT Issues and Business Migration

Navigating multistate tax compliance post-*Wayfair* including business migrations to Texas, remote worker issues, and transactional considerations.

Christina A. Mondrik, Mondrik & Associates,
Austin, TX
Steven D. Moore, Jackson Walker LLP, Austin, TX

12:15 p.m. Pick Up Lunch

Included in registration.

WEDNESDAY AFTERNOON

Presiding Officer:

Jimmy Martens, Martens, Todd, &
Leonard, Austin, TX

LUNCHEON PRESENTATION

Introduction

Lawrence B. Gibbs, Miller & Chevalier,
Washington, DC

12:45 p.m. 1.00 hr ethics

Identifying Emerging Issues at the IRS

A view from inside the agency about how the IRS keeps up with emerging tax noncompliance and tax fraud issues and an introduction to the new IRS Joint Strategic Emerging Issues Team.

Tom Cullinan, Office of the Commissioner, Internal Revenue Service, Washington, DC
Thomas Hybertson, Deputy Commissioner Services and Enforcement Program Management Office, Internal Revenue Service, Sioux Falls, SD
Holly Porter, Passthroughs & Special Industries, Office of Chief Counsel, Internal Revenue Service, Washington, DC

1:45 p.m. 15-Minute Break

2:00 p.m. 1.00 hr | .25 hr ethics

How Firm are Court Filing Deadlines in Tax Cases?

Earlier this year, the Supreme Court rejected the IRS's position that the 30-day deadline for filing a Tax Court petition in a Collection Due Process case is "jurisdictional" and therefore not subject to equitable tolling. The decision follows a recent trend in Supreme Court jurisprudence and its potentially far-reaching consequences in Tax Court cases is already being litigated. Former IRS Chief Counsel Mike Desmond explains and evaluates the breadth of the decision, potential government responses, and the ramifications of this important development in other areas of the tax law.

Michael J. Desmond, Gibson, Dunn & Crutcher LLP,
Los Angeles, CA

3:00 p.m. 1.00 hr | .25 hr ethics

Dealing with Sticky Situations: Overbroad IDRs, Requests for Client Interviews, and Other Tricky Audit Situations

With the IRS laser-focused on enforcement, many taxpayers may find themselves subject to an intrusive audit. These audits can involve tricky situations like client interviews, broad IDRs, site tours, and acknowledgment of facts IDRs. These speakers discuss best practices and considerations in handling these tricky situations, as well as the importance of civility in interactions with the IRS.

Mary A. McNulty, Holland & Knight LLP, Dallas, TX
Lee Meyercord, Holland & Knight, Dallas, TX

4:00 p.m. 10-Minute Break

4:10 p.m. 1.00 hr ethics

Keeping Your Clients Out of Hot Water: Drafting Effective Tax Return Disclosures

A well-drafted disclosure statement can provide more penalty protection than a tax opinion letter. This skill-building session teaches you how to improve the disclosures you write to manage audit risk and limit penalties.

Lawrence Sannicandro, McCarter & English, LLP,
Newark, NJ

5:10 p.m. Adjourn

NETWORKING RECEPTION

5:10 p.m. – 6:10 p.m.

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

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70TH ANNUAL
TAXATION CONFERENCE DAY 2: BUSINESS TRANSACTIONS

December 1, 2022 ■ DoubleTree by Hilton Hotel Austin ■ Austin, Texas

Earn up to 7.50 Hours of Credit Including 1.50 Hours of Ethics Credit
MCLE Credit Approved in TX, CA, OK, and PA (Hours Vary By Jurisdiction)
Specialization Credit Approved for Estate Planning and Probate Law and Tax Law
TX and National Accounting CPE and Certified Financial Planner (CFP) Credit Available
NASBA Credit Available for In-Person Conference Only

Times listed are in Central Time

THURSDAY MORNING, DEC. 1, 2022

Presiding Officer:

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

7:30 a.m. Conference Room Opens

Includes continental breakfast.

8:20 a.m. Welcoming Remarks

8:30 a.m. 1.00 hr

Disguised Sales

A review of the most recent Section 707 regulations as they apply to transactions commonly encountered by tax practitioners, with practical advice on dealing with contributions of property to a venture, withdrawals of cash, and the intersection of both.

Andrea M. Whiteway, EY LLP, Washington, DC

9:30 a.m. 1.00 hr

News You Can Use: The World of Tax Credits Post-Inflation Reduction Act Changes

The Inflation Reduction Act has supercharged the tax incentives available for all types of clean energy projects and manufacturing for everything from wind and solar to carbon capture, clean hydrogen, biogas and many other technologies. Learn about the credits now available and the new credit monetization techniques the Act sanctions that allow taxpayers to turn credits into cash.

Barbara Spudis de Marigny, Baker Botts, Houston, TX

10:30 a.m. 15-Minute Break

10:45 a.m. 1.00 hr

Drop and Swap Panel

How to do (and not to do) partnership like-kind exchanges, including drops, swaps, installment notes, etc.

Stanley L. Blend, Clark Hill, PLC, San Antonio, TX
Michael L. Cook, Cook Brooks Johnson PLLC,
Austin, TX
Richard M. Lipton, Baker McKenzie LLP, Dallas, TX

11:45 a.m. Pick Up Lunch

Included in Registration.

THURSDAY AFTERNOON

Presiding Officer:

Patrick O'Daniel, Norton Rose Fulbright
LLP, Austin, TX

THANK YOU TO OUR LUNCHEON SPONSOR



LUNCHEON PRESENTATION

12:15 p.m. 1.00 hr ethics

Mum's the Word: Maintaining Client Confidentiality while Working from Anywhere and Everywhere

Working remotely and virtual meetings are here to stay. This presentation provides practical suggestions for structuring engagement letters, addressing conflicts of interest, and safeguarding client communications across all mediums.

Jeff Chadwick, Winstead PC, The Woodlands, TX

1:15 p.m. 15-Minute Break

1:30 p.m. 1.00 hr | .25 hr ethics

Choose Wisely: Choice of Entity Issues in an Always Changing Landscape

The constantly changing legal landscape significantly affects the choice of entity for a business. This presentation discusses what has changed, and gives tips for evaluating the benefits and detriments of each option.

Gene Wolf, Kemp Smith LLP, El Paso, TX

ACTION THROUGH EDUCATION

Our efforts for real change against racism.

Learn how we as lawyers can join the fight against racial injustice.

Visit www.utcle.org for more.

2:30 p.m. 1.00 hr

19 Years After the Final Regulations: Where are We with Split-Dollar Life Insurance Financing?

Contrary to some predictions 19 years ago, split-dollar premium financing is very much alive and well. Hear a discussion on its use for executive perks, cross-purchase agreements, deferred compensation and wealth transfer. Also, tax implications and factors to consider in choosing either the loan regime or the economic benefit regime are presented.

Donald O. Jansen, The University of Texas System,
Austin, TX

3:30 p.m. 10-Minute Break

3:40 p.m. 1.50 hrs | .25 hr ethics

Advising a Closely Held Client on the Purchase or Sale of a Business

Buyers and sellers of businesses often face critical issues concerning acquisition alternatives, due diligence required, optimal borrowing solutions, and valuations of assets and earnings. Learn about these issues from these experts in acquisitions and mergers, investment banking, and business valuation.

Craig M. Bergez, Porter Hedges LLP, Houston, TX
John P. Dennis III, WoodRock & Co., Houston, TX
Michael Landers, UHY LLP, Houston, TX

5:10 p.m. Adjourn

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CRAIG M. BERGEZ Porter Hedges LLP Houston, TX	JOHN P. DENNIS III WoodRock & Co. Houston, TX	RICHARD M. LIPTON Baker McKenzie LLP Dallas, TX	GENE WOLF Kemp Smith LLP El Paso, TX
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www.utcle.org/conferences/TXB22/signup

Mail:
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ATTN: Registration
PO Box 7759
Austin, TX 78713-7759

Fax:
512.475.6876

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 business days prior to the conference.

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Invoices, confirmations and receipts are emailed to these addresses.

CONFERENCE REGISTRATION

LIVE EVENT REGISTRATION

Special group registration rates available. Call 512.475.6700

Taxation Conference Day 1 Focus on Controversy Registration

Includes Electronic Course Binder Download (PDF) in "Your Briefcase."

- Live, In-person Event Registration \$350 | \$400 after November 21
- Live Webcast Registration \$350 | \$400 after November 21

Taxation Conference Day 1 Printed and Shipped Binder with Registration (Shipping Included) – Available Through Thursday, December 1

Please Note: Printed binder will arrive 2-3 weeks after the conclusion of the live conference.

Delivery to P.O. boxes is not permitted. Binders will not be distributed on-site.

- Printed and Shipped Course Binder \$70.36 (\$65*)

Taxation Conference Day 1 Webcast Add-on

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

- Webcast Add-on \$75

Taxation Conference Day 1 Registration Total \$ _____

Taxation Conference Day 2: Focus on Business Transactions Registration

Includes Electronic Course Binder Download (PDF) in "Your Briefcase."

- Live, In-person Event Registration \$350 | \$400 after November 21
- Live Webcast Registration \$350 | \$400 after November 21

Taxation Conference Day 2 Printed and Shipped Binder with Registration (Shipping Included) – Available Through Thursday, December 1

Please Note: Printed binder will arrive 2-3 weeks after the conclusion of the live conference.

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Taxation Conference Day 2 Webcast Add-on

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

- Webcast Add-on \$75

Taxation Conference Day 2 Registration Total \$ _____

REGISTRATION SUBTOTAL \$ _____

SAVE \$100 WITH REGISTRATION FOR BOTH DAYS **-\$100**

FIRST AND SECOND YEAR ATTORNEYS MAY ATTEND FOR JUST \$150! CALL 512.475.6700 TO REGISTER.

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Tax Conference Day 1 eConference – For Texas and California MCLE Credit

Includes Electronic Course Binder Download (PDF) and program video/audio. Available 4–6 weeks after live event. Hours may vary depending on actual event runtime.

- Tax Conference Day 1 eConference. \$400

Tax Conference Day 1 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) \$156.96 (\$145*)
- Printed Post-Course Binder. \$211.09 (\$195*)

Tax Conference Day 1 Post-Conference Products Subtotal \$ _____

Tax Conference Day 2 eConference – For Texas and California MCLE Credit

Includes Electronic Course Binder Download (PDF) and program video/audio. Available 4–6 weeks after live event. Hours may vary depending on actual event runtime.

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TXA22/TXB22

AUSTIN**Day 1: November 30, 2022****Day 2: December 1, 2022****CONFERENCE LOCATION****DoubleTree by Hilton Hotel Austin**

6505 N. Interstate 35

Austin, TX 78752-4346

800-866-3126 (reservations)

Special Room Rate: \$140

good through November 8, 2022

reference "UT Taxation and Estate

Planning Conference"

(subject to availability)

Parking:Please visit www.utcle.org/conferences/TX22A

for daily and overnight rates

KEY DATES**November 21, 2022***Last day for early registration rates***November 22, 2022***Last day for full refund cancellation***November 28, 2022***Last day for partial refund cancellation*

\$50 processing fee applied

November 30, 2022, 8:20 a.m., CT*Conference Day 1 begins***December 1, 2022, 8:20 a.m., CT***Conference Day 2 begins***December 1, 2022***Last day to order a printed and shipped course binder
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Practice Excellence.**We are here to support our community while we navigate the coronavirus pandemic together. 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.

