Hear nationally recognized tax and estate planning legal practitioners, law professors and accountants present in-depth reviews of new tax statutes, regulations and court decisions

Discuss the latest tax issues that impact your practice now and in the future

Join your colleagues for a Luncheon Presentation on the current tax reform developments happening in Washington, DC

Earn over 18 hours of CLE/CPE eligible credit, including Ethics and Professionalism

Enjoy the sights, sounds and spirit of one of the world’s most exciting and interesting cities
Wednesday, October 22, 2014

8:00 – 8:30  Registration

8:30 – 9:45  Recent Developments in the Taxation of Corporations and Shareholders
Bruce McGovern, Professor, South Texas College of Law, Houston, TX
• A discussion of the significant court decisions, rulings, and statutory and regulatory developments of the past year

9:45 – 10:00  Break

10:00 – 11:00  Compensation Reclassification Issues for C & S Corporations
Steve Looney, Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, P.A., Orlando, FL
• Addressing the reclassification of compensation and other payments to shareholders as dividends (unreasonably high compensation) in the context of C corporations
• Addressing the reclassification of distributions as compensation (unreasonably low compensation) subject to payroll tax liability in the context of S corporations
• The increasing application by the IRS and Courts of the so-called “independent investor test” to determine reasonable compensation

11:00 – 12:00  Tax Issues in Separating Closely-Held Businesses
David Strong, Morrison & Foerster LLP, Denver, CO

12:00 – 1:30  Lunch (on your own)

1:30 – 2:30  Post-Mortem Income Tax Planning for Closely-Held Companies
B. Trevor Wilson, Jones Walker LLP, Baton Rouge, LA

2:30 – 3:30  International Tax Planning for Small and Mid-Size Businesses
Seth Abrams, Deloitte LLP, Houston, TX
Firas Zebian, Deloitte LLP, Dallas, TX

3:30 – 3:45  Break

3:45 – 4:45  Ethical Considerations for Tax Controversy
Sara G. Neill, Capes, Sokol, Goodman & Sarachan, P.C., St. Louis, MO

Thursday, October 23, 2014

8:30 – 9:45  Recent Developments in the Taxation of Individuals and Partnerships
Bruce McGovern, Professor, South Texas College of Law, Houston, TX
• A discussion of the significant court decisions, rulings, and statutory and regulatory developments of the past year

9:45 – 10:00  Break

10:00 – 11:00  Disguised Sales/Section 752 Proposed Regulations
Kevin M. Richards, Ernst & Young LLP, Houston, TX

11:00 – 12:00  Net Investment Income Tax – One Year In
Jeanne Sullivan, KPMG, Washington, DC

12:00 – 1:30  Luncheon Presentation
Nina E. Olson, National Tax Advocate, Tax Advocate Service, Washington, DC

1:30 – 2:30  State Taxation of Pass-Through Entities – A Survey of Issues: The Good, the Bad and the Ugly
Christopher R. Grissom, Bradley Arant Boult Cummings LLP, Birmingham, AL
• Consider the issues unique to joint pass-through entities for state tax purposes, including resurgence of nexus challenges, nonresident withholding, and classification
• Understand franchise and other “non-income” tax issues for pass-throughs
• Planning options with investment partnerships and series LLCs

2:30 – 3:30  Tax Issues in Private Equity Transactions
Peter Schuur, Debevoise & Plimpton LLP, New York, NY
Eric Sloan, Deloitte LLP, New York, NY

3:30 – 3:45  Break

3:45 – 4:45  CONCURRENT SESSION
a) Professionalism
Barry H. Grodsky, Taggart Morton, L.L.C., New Orleans, LA

OR

b) Final Capitalization Regs and Transition Rules
Gordon Meyer, Postlethwaite & Netterville, Metairie, LA
**Friday, October 24, 2014**

8:30 – 9:45  **Recent Developments in Federal Gift and Estate Taxation**  
**Elaine H. Gagliardi**, Professor, The University of Montana School of Law, Missoula, MT

9:45 – 10:00  Break

10:00 – 11:00  **Planning for Estates Under the $10 Million Exemption**  
**Stephen R. Akers**, Bessemer Trust, Dallas, TX
- Maximizing income tax basis at death, minimizing federal and state estate taxes, asset protection and “divorce protection,” and the always present desire for simplicity and cost-consciousness
- Planning around the 3.8% tax on net investment income and increased taxes on trusts will become central to trust administration issues
- Maximizing flexibility to take advantage of increasing basis without any estate tax cost becomes central to planning
- Wealth transfer planning will emphasize strategies to transfer wealth without using up an individual’s exclusion amount

11:00 – 12:00  **Donor-Centric Philanthropy**  
**Edward J. Beckwith**, BakerHostetler, Washington, DC

12:00 – 1:30  Lunch (on your own)

1:30 – 2:30  **Why Isn’t Everyone Using Formula Gifts**  
**John W. Porter**, Baker Botts, Houston, TX

2:30 – 3:30  **Preparing the Best Possible Gift Tax Returns**  
**Stephanie Loomis-Price**, Winstead PC, Houston, TX
- Audit-proofing (to the extent possible), including the reporting of formula transfers that may be highly scrutinized
- Consider impact of presentation of transfer tax returns
- Audit processes and triggers for selection – and how to avoid them
- Adequate disclosure checklist for use in preparing transfer tax returns

3:30 – 3:45  Break

3:45 – 4:45  **Basics of International Estate Planning**  
**Joshua S. Rubenstein**, Katten Muchin Rosenman LLP, New York, NY
- US income and transfer taxation of resident and nonresident aliens
- Considerations when foreigners come to or invest in the US
- Considerations when Americans move or invest abroad
- The foreign trust rules
- Information reporting requirements with respect to foreign assets
- Expatriation and different property and matrimonial regimes

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**Tulane CLE Hardship Policy**

Tuition assistance will be extended to those attorneys who are unemployed or employed in the public sector and who can establish financial hardship. Attorneys who meet the criteria will be granted a credit of up to 50% of the applicable course registration fee. Applications and resumes must be received no later than two weeks prior to the program to be eligible for consideration. For more information or an application please contact Tulane CLE.

**Continuing Education Credits**

This program is being presented in Louisiana, a mandatory CLE state, for a maximum of 18.75 hours of instruction, including 1 hour of ethics and 1 hour of professionalism. In addition, this program qualifies for 18.75 hours of Tax Specialization credit and 6.25 hours of Estate Planning Specialization credit per the recently approved LBLS revisions to the Tax Law Standards. The Tulane CLE will assist attorneys with their credit reporting requirements. CPAs are responsible for their own credit reporting.

**To obtain continuing education credits, all registrants MUST complete and return the Certificate of Attendance and other required forms before leaving the seminar.**
GENERAL INFORMATION

Registration & Fees
Online registration is available at: www.law.tulane.edu/tax. Register by September 26 and SAVE! Discounted Early Registration is $695 (3 days), $550 (2 days) and $300 (1 day). The Registration fee after September 26 is $750 (3 days), $600 (2 days) and $350 (1 day).

Registration includes refreshments each day, luncheon on Thursday and course materials on a flash drive. A government/academic discount is offered for government employees or full time faculty/staff of an academic institution. Please check the online registration site at www.law.tulane.edu/tax or call the Tulane CLE office at 504.865.5900 for more information. The online registration site must be used to register if paying for your registration with a credit card. The Tax Institute accepts checks, cash, Visa or MasterCard ONLY. It is advisable to pre-register as space may be limited. Please select the lunch option if you plan to attend the Thursday luncheon presentation.

Course Materials
The extensive Institute course materials will be distributed at the seminar on a convenient flash drive. These materials will also be available for download before the conference to everyone registered for the Institute. An e-mail with a link for downloading the materials will be sent to all Tax Institute registrants 3-5 days before the conference. If you do not receive this e-mail by the Monday before the conference, please contact the CLE office. Hard copies of the full materials can be purchased for $150. To order a hard copy, please check the course material option on the registration form or order online. To guarantee receipt of a hard copy of the materials, orders must be received by October 8. Ordered hard copy materials will be distributed at the seminar.

Cancellations & Refunds
A full refund, less a $50 administrative fee, will be offered through October 15, 2014. Absolutely NO refunds will be made after October 15. Registrations may be transferred to another member of the same firm through October 15. Cancellations and transfers must be submitted in writing either via fax to 504.866.1583 or e-mail to mcle@tulane.edu no later than 5pm on October 15, 2014.

Hotel Reservations
The Institute hotel is the Westin Canal Place located at 100 Iberville Street at the corner of North Peters Street. A small block of rooms has been reserved at a special discounted rate. This group rate will be available until September 22, 2014. To reserve your room, call 1.800.228.3000 or 504.566.7006 and be sure to ask for the “Tulane Law School Tax Institute” room block. You may also book online at www.law.tulane.edu/tax.

Tulane Tax Institute
October 22 – 24, 2014

Registration Form
Tulane Tax Institute, October 22 – 24, 2014

Early Bird Registration (through September 26)

☐ 3 Day Registration - $695
☐ 2 Day Registration - $550
☐ 1 Day Registration - $300
☐ I will attend the Luncheon on Thursday, October 23

☐ I wish to purchase a Hard Copy of Course Materials - $150 (registration fee includes flash drive only)

Regular Registration (after September 26)

☐ 3 Day Registration - $750
☐ 2 Day Registration - $600
☐ 1 Day Registration - $350

Name: _________________________________________________________

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Credit Card: Registrations paid with a credit card (VISA or MasterCard ONLY) MUST REGISTER ON-LINE at www.law.tulane.edu/tax

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