

TEXAS FEDERAL TAX INSTITUTE

SAN ANTONIO, TEXAS

JUNE 8-10, 2016



32ND ANNUAL

TEXAS FEDERAL TAX INSTITUTE

JUNE 8-10, 2016

HYATT HILL COUNTRY RESORT

SAN ANTONIO, TEXAS

THE TEXAS FEDERAL TAX INSTITUTE BRINGS TOGETHER LEADING CORPORATE, PARTNERSHIP, REAL ESTATE AND TAX CONTROVERSY PROFESSIONALS FROM ACROSS THE UNITED STATES AND IS REGARDED AS THE PREMIER FEDERAL TAX EVENT IN THE SOUTHWEST.

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32ND ANNUAL TEXAS FEDERAL TAX INSTITUTE

LEARNING OBJECTIVE

The Institute is designed for tax practitioners and executives with a strong Federal tax background and is intended to immerse them in the unique principles, regulations, rulings and cases that impact corporate, partnership and real estate transactions, as well as tax controversies, so that by the end of the Institute the practitioner or executive can effectively represent his or her client or employer in the various deal structures that arise in these contexts.

The Institute will provide high-level information, practical advice you can implement, and in-depth analysis of the latest trends and developments from the leading experts in these fields of taxation. Attendees will return to work with a wealth of materials, plus the tools and strategies needed to help save their clients' tax dollars and provide them better service.

WHO IS THE AUDIENCE FOR THE TEXFED INSTITUTE?

The Institute is designed for tax practitioners and executives — lawyers, accountants, tax directors — who are already adept at Federal income tax principles. The audience will be exposed to seasoned practitioners sharing insight and knowledge enhancing individual skills in corporate, partnership, and real estate tax transactions as well as Federal tax controversies.

WEDNESDAY, JUNE 8, 2016

TAX CONTROVERSY PROGRAM

CO-CHAIRS: Pamela F. Olson, *Washington, D.C.*

Abraham N.M. "Hap" Shashy, *Washington, D.C.*

11:30 AM REGISTRATION

12:55 PM WELCOME

Kevin Thomason, *Dallas, Texas, Institute President*

1:00 PM IDRs/SUMMONS/PRIVILEGE (0.25 HOUR ETHICS CREDIT)

This panel will discuss the mechanics of the relatively new IRS IDR/summons regime, negotiating response dates, as well as recent developments in the area of attorney-client privilege, Section 7525 privilege, and work product.

MODERATOR: Nathan E. Clukey, *Washington, D.C.*

SPEAKERS: George A. Hani, *Washington, D.C.*

Abraham N. M. "Hap" Shashy, *Washington, D.C.*

2:00 PM IRS APPEALS

This panel will discuss the role of Appeals, the placement of Appeals, the implications to Appeals of the LB&I reorganization, and the shift to issue campaigns.

MODERATOR: Sheldon "Shelly" M. Kay, *Atlanta, Georgia*

SPEAKERS: Kirsten B. Wielobob, *Internal Revenue Service, Washington, D.C.*

Emily A. Parker, *Dallas, Texas*

3:00 PM COFFEE BREAK

3:15 PM LB&I REORGANIZATION AND FOCUS GOING FORWARD

This panel will discuss where things stand now, how and when the new reorganization will proceed, and an explanation of audit priorities, "issue campaigns," and training and management implications.

MODERATOR: Samuel M. Maruca, *Washington, D.C.*

SPEAKERS: Rosemary J. Sereti, *Internal Revenue Service, Washington, D.C.*

Kevin Otero, *Fairfield, Connecticut*

4:15 PM CIVIL ENFORCEMENT PRIORITIES (0.25 HOUR ETHICS CREDIT)

This panel will discuss a mix of specialized and more general topics, including the Taxpayer Advocate, employment tax audits, refund fraud/identity theft, and the Offshore Voluntary Disclosure Program, focusing on small business, self-employed and individual taxpayers.

MODERATOR: Michael P. Dolan, *Washington, D.C.*

SPEAKERS: Thomas J. Kane, *Internal Revenue Service, Washington, D.C.*

C.J. "Chad" Muller, *San Antonio, Texas*

Mary W. Prosser, *Dallas, Texas*

5:15 PM COFFEE BREAK

5:30 PM NEW PARTNERSHIP AUDIT RULES

This panel will discuss the new substantive rules, the background behind their passage (and the ramifications of the repeal of TEFRA), and the practical implications of the new rules in tax controversies.

MODERATOR: Michael Hauswirth, *Washington, D.C.*

SPEAKERS: Hon. William J. Wilkins, *Internal Revenue Service, Washington, D.C.*

Joel N. Crouch, *Dallas, Texas*

6:30 PM WELCOME COCKTAIL RECEPTION

HOSTED BY MEADOWS, COLLIER, REED, COUSINS, CROUCH & UNGERMAN, L.L.P.

A complimentary cocktail happy hour for all attendees.

FOR MORE INFORMATION VISIT WWW.TEXFEDTAX.ORG

THURSDAY, JUNE 9, 2016

MODERATOR: R. David Wheat, Dallas, Texas, Institute Vice President
Past Chair, Section of Taxation, State Bar of Texas; Past Chair, ABA Tax Section, Corporate Tax Committee

7:30 AM THE TEXFED TAX CONTROVERSY ROUNDTABLE
CO-SPONSORED BY KING & SPALDING LLP AND MILLER & CHEVALIER CHARTERED
A lively question and answer session with many of our speakers, including Government representatives. Tickets may be purchased for \$125 each. Please indicate the number of tickets you wish to purchase on the enclosed registration form.
[Please note: A limited number of tickets will be sold for \$175 at the door]

MODERATORS: Pamela F. Olson, Washington, D.C.
Abraham N. M. "Hap" Shashy, Washington, D.C.

SPECIAL GUEST: Hon. William J. Wilkins, Internal Revenue Service, Washington, D.C.

8:00 AM LATE REGISTRATION

8:50 AM WELCOME
Kevin Thomason, Dallas, Texas, Institute President

9:00 AM CURRENT CORPORATE TAX DEVELOPMENTS (0.25 HOUR ETHICS CREDIT)
A review and analysis of recent developments in corporate taxation, including spin-offs, reorganizations, and consolidated returns.

SPEAKERS: William D. Alexander, Washington, D.C.
Kevin M. Jacobs, Internal Revenue Service, Washington, D.C.
Krishna P. Vallabhaneni, U.S. Treasury Department, Washington, D.C.

10:00 AM COFFEE BREAK

10:15 AM REDEMPTIONS AND DISTRIBUTIONS BY CLOSELY HELD CORPORATIONS
This panel will address the tax consequences to both the recipient and the distributing corporation of both ordinary and extraordinary distributions (including redemptions) with a focus on closely held entities including "boot-strap" acquisitions and redemptions and structuring and planning opportunities.

SPEAKERS: Kevin M. Jacobs, Internal Revenue Service, Washington, D.C.
Phillip B. Wright, St. Louis, Missouri

11:15 AM TAX CONSIDERATIONS FOR BUYERS AND SELLERS OF S CORPORATIONS
Analysis of significant federal income tax issues presented for buyers and sellers of S corporations, including Sections 338(h)(10) and 336(e) elections, sales of qualified Subchapter S subsidiaries, built-in gains tax, installment sales, and different purchase and sale structures, with emphasis on private equity buyer transactions.

SPEAKER: Eric M. Elfman, Boston, Massachusetts

12:15 PM THE LATHAM & WATKINS LLP TAX LEGENDS LUNCHEON: A CAREER IN TAX (1 HOUR ETHICS CREDIT)
Hear about former Assistant Secretary of the Treasury Pamela Olson's extraordinarily diverse career as a tax lawyer, both in and out of the Government. Lunch is included with registration.

INTERVIEWEE: Pamela F. Olson, Former Assistant Secretary of the Treasury (Tax Policy), Washington, D.C.

INTERVIEWER: William D. Elliott, Dallas, Texas

1:45 PM NOL LIMITATIONS FOR PRIVATE COMPANIES
Everything you wanted to know about Section 382, but were afraid to ask! A discussion of this complex section in the context of private companies, considering the limitations it imposes and the possible opportunities it permits, including Section 384, designed to prevent back-door attempts to monetize NOLs.

SPEAKER: Elliot Freier, Los Angeles, California

2:45 PM COFFEE BREAK

3:00 PM WORKOUTS AND BANKRUPTCIES IN THE OIL PATCH
Like Earl Campbell careening through a defensive backfield, painfully low commodity prices are wreaking havoc on the oil and gas industry. This panel will discuss the tax issues inherent in restructuring an oil and gas company, with particular emphasis on the relatively new issues in restructuring widely held flow-through entities and master limited partnerships.

SPEAKERS: Mark R. Hoffenberg, Washington, D.C.
Todd F. Maynes, Chicago, Illinois

4:00 PM CORPORATE TRANSACTIONS USING PARTNERSHIPS AND LLCs
The intersection of the rules of Subchapter C and the rules of Subchapter K presents uncertainties, pitfalls and opportunities, both for tax practitioners and tax authorities. This panel will explore some common issues arising for corporate partners upon partnership formation, operation, and wind-up transactions, and review recent guidance in the area.

SPEAKERS: Craig A. Gerson, Washington, D.C.
Eric Solomon, Washington, D.C.
Krishna P. Vallabhaneni, U.S. Treasury Department, Washington, D.C.

5:00 PM COCKTAILS WITH THE STARS HOSTED BY WELLS FARGO BANK
A complimentary cocktail happy hour for all attendees with many of our featured speakers.

This Institute has been approved for 19.75 hours credit (including 3.00 hours ethics), which will apply toward MCLE, the College of the State Bar of Texas, and the Texas Board of Legal Specialization in Tax Law, Real Estate Law and Estate Planning Probate. MCLE credit is available in other states. Please let us know your needs when you register for the Institute.

Texas Federal Tax Institute 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. This course has been approved for 23.70 CPE credit hours.

FRIDAY, JUNE 10, 2016

MODERATOR: William P. Bowers, Dallas, Texas, Institute Vice President
Past Chair, Section of Taxation, State Bar of Texas

7:30 AM THE LOCKE LORD TexFED ROUNDTABLE BREAKFAST

A lively question and answer session with many of our speakers, including Government representatives. Tickets may be purchased for \$125 each. Please indicate the number of tickets you wish to purchase on the enclosed registration form.
[Please note: A limited number of tickets will be sold for \$175 at the door]

MODERATORS: William P. Bowers, Dallas, Texas
Eric Solomon, Washington, D.C.
Amy L. Sutton, Houston, Texas

8:50 AM WELCOME

Kevin Thomason, Dallas, Texas, Institute President

9:00 AM CURRENT DEVELOPMENTS IN PARTNERSHIP AND REAL ESTATE TAXATION (0.25 HOUR ETHICS CREDIT)

A review and analysis of recent developments in partnership and real estate taxation, including noteworthy cases, regulations, and rulings.

SPEAKERS: Ossie Borosh, U.S. Treasury Department, Washington, D.C.
Craig A. Gerson, Washington, D.C.
Curtis G. Wilson, Internal Revenue Service, Washington, D.C.

10:00 AM COFFEE BREAK

10:15 AM ALLOCATIONS AND VARYING INTERESTS – THE SECTION 706 REGULATIONS

This panel will discuss the recent final and proposed Treasury regulations that address the allocations in partnerships with varying interests.

SPEAKERS: John J. Rooney, Washington, D.C.
Benjamin H. Weaver, Internal Revenue Service, Washington, D.C.

11:15 AM USE OF DELAWARE STATUTORY TRUSTS IN NON-SYNDICATED EXCHANGES AND DROP-AND-SWAPS

Delaware Statutory Trusts (DSTs) have become increasingly popular since the TIC meltdown of the late 2000s and can be utilized to facilitate complex acquisition and disposition fact patterns involving Section 1031, including where the target property produces non-rent income or a more democratic control mechanism is desired and as a “synthetic” drop-and-swap vehicle. This panel will discuss the creative use of the DST structure in non-syndicated Section 1031 contexts, with multiple examples out of their recent real-world experience.

SPEAKERS: Daniel F. Cullen, Chicago, Illinois
Darryl Steinhouse, San Diego, California
Kevin Thomason, Dallas, Texas

12:00 PM THE HUNTON & WILLIAMS TAX POLICY LUNCHEON: THE IMPACT OF IRS RESOURCE CONSTRAINTS ON OUR TAX SYSTEM AND TAX PRACTICE (1 HOUR ETHICS CREDIT)

Hear the current Chair of the ABA Tax Section reflect on various topics facing tax professionals, including ethical issues. Lunch is included with registration.

SPEAKER: George C. Howell, III, Richmond, Virginia

1:30 PM DOING A DEAL WITH A PRIVATE EQUITY FUND

This presentation focuses on some of the common structuring techniques private equity buyers often incorporate into their pass-through deals, such as using F reorganizations to move assets for tax purposes only, having sellers form a partnership so buyers can purchase partnership interests, using debt-financed distributions to introduce debt into the target, and having partnerships continue their existence due to the presence of historic rollover partners.

SPEAKER: Amy L. Sutton, Houston, Texas

2:30 PM NEW PARTNERSHIP AUDIT RULES – LET’S GET PRACTICAL

The Bipartisan Budget Act of 2015 introduced an entirely new set of rules governing partnership tax audits. This panel will describe the new rules, the multiple issues raised from varying perspectives and discuss what needs to be done now in drafting partnership and LLC agreements and disclosure documents.

SPEAKERS: Pamela Lawrence Endreny, New York, New York
Eric B. Sloan, New York, New York

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