

CHAMBERLAIN, HRDLICKA, WHITE, WILLIAMS & AUGHTRY
26TH ANNUAL TAX AND BUSINESS PLANNING SEMINAR
TUESDAY, NOVEMBER 8, 2011

Cobb Galleria Centre
Two Galleria Parkway, Atlanta, Georgia 30339

Ballroom Pre-Function Area • Second Floor
Complimentary Parking

WORKSHOP GROUP I:

Indicate two workshops and an alternate in preferential order from this group on the reservation form.

IA CAPTIVE INSURANCE COMPANIES: A PROFIT MAXIMIZATION AND RISK REDUCTION TOOL FOR YOUR CLIENTS' BUSINESSES

Captive insurance companies present tremendous profit enhancement opportunities from a business risk, tax, asset protection, and estate planning perspective. We will discuss these opportunities as well as how to appropriately form and operate a captive so that it can survive scrutiny by the IRS.

*J. Scot Kirkpatrick, Kimberly S. Bunting
and Karen S. Kurtz*

IB RELEASE THE HOUNDS! AGGRESSIVE NEW IRS CRIMINAL INVESTIGATION TACTICS – IS ANYONE, OR ANY DOCUMENT, SAFE ANYMORE?

In its aggressive pursuit of taxpayers and tax professionals, the IRS has thrown away its old playbook and is now using aggressive new tactics for obtaining evidence and criminal convictions. This topic highlights the new tactics employed by the IRS, and offers a plan for avoiding pitfalls that could lead to a prison sentence.

George B. Abney and William E. Buchanan

IC WHAT'S THE BOTTOM LINE? TAX ISSUES WITH RESPECT TO BUYING AND SELLING PARTNERSHIP INTERESTS

John Doe is the majority owner of Doe Operations, LLC, taxed as a partnership. John has decided to sell all or part of his membership interest to his friend, Mark Smith. John has come to you with questions on the consequences of a sale and whether he should sell all or part of his membership interest to Mark. We will walk through the details of their transaction and the income tax consequences to John, Mark, and Doe Operations, LLC with respect to this sale. The conversation will include the consequences of selling all of the membership interest owned by the Seller, making a partial sale of his interest, special basis issues for each party, character of any gain or loss realized, and holding period of the assets transferred.

David W. Siegel and Ashley P. Alderman

ID WHEN PASSING THE TORCH MAY SET YOU ON FIRE: HAZARDS OF PASSING THE FAMILY BUSINESS TO THE FAMILY FOUNDATION

Many hazards may await the charitably minded business owner who wants to provide a donation of valuable business interests to his charitable foundation. Potential hazards include loss of control, unwanted excise taxes, realization of income, or even loss of tax exempt status. The speakers will provide a detailed roadmap of potential hazards and will provide advice on ways to extinguish the fires that may result from such types of donations.

Rose K. Drupiewski and Kristen S. Lowther

LUNCHEON
TOPIC:

**Judicial
Riptides: The
Year Democracy
Drowned**

David D. Aughtry

*Advance Registration:
\$100*

*On-Site Registration:
\$115*

*Written materials,
including outlines of all
workshops, will be
provided*

*Registration Begins:
11:00 am*

*Complimentary Lunch:
11:30 am-12:35 pm*

*Luncheon
Presentation:
11:30 am-12:35 pm*

*Workshops:
12:45 pm-5:30 pm*

*Reception:
5:30 pm-6:30 pm*

WORKSHOP GROUP II:

Indicate two workshops and an alternate in preferential order from this group on the reservation form.

IIE WHAT EVERY EMPLOYER SHOULD DO NOW TO DEFEND AGAINST IRS AND DOL AUDITS

A strong dedicated workforce is the foundation of every successful company's business model. However, this sturdy foundation is being assaulted by worker classification challenges that can have devastating effects on a company. Federal and state agencies, Congress, attorneys and disgruntled employees have declared war on companies they claim wrongly classify employees as independent contractors. Moreover the IRS National Research Project has focused on worker classification and identified many other areas of exposure. This presentation will focus on understanding risks and mechanisms to mitigate exposure to tax and wage issues and new guidance related to recent developments this year.

Heather M. Pesikoff and Annette A. Idalski

IIF ASSET PROTECTION FOR COUPLES MARRIED TODAY (AND DIVORCED TOMORROW)

Tax and non-tax considerations when dealing with asset protection planning for a married couple, including what happens in the event of divorce. This presentation includes key concepts to be aware of when representing a married couple as well as commentary on specific asset protection options for the couple.

James M. Kane and Courtney H. Moore

IIG WHEN ARE HARD TIMES HARD ENOUGH (FOR THE IRS)? EFFECTIVELY USING FINANCIAL DISTRESS AS REASONABLE CAUSE FOR PENALTY ABATEMENT

Certain facts are undisputed: the economy continues to struggle; many taxpayers are facing serious financial distress; cash-flow problems lead to late payments; and granting penalty abatement conflicts with the IRS's revenue-maximizing mission. It comes as no surprise, then, that the IRS often denies penalty abatement requests rooted in a taxpayer's financial troubles. This presentation provides tax representatives with all the ammunition they need to mount a successful financial-distress defense to penalties with the IRS or the courts.

Hale E. Sheppard and Lori M. Broyles

IIH WINNING VALUATION DISPUTES

Be it estate, gift, conservation easement, Section 482 or other valuation fight, advanced techniques can make a huge difference. This presentation will focus upon the strategy, development, attack, and defense of a valuation war.

David D. Aughtry and John W. Hackney

Registration Form

(Check / Money Order / Credit Card)

**Please make checks/money orders payable to,
and mail to:**

Chamberlain, Hrdlicka, White, Williams & Aughtry
191 Peachtree Street, N.E., Thirty-Fourth Floor
Atlanta, Georgia 30303

Attention: Mary Beth Caracciolo

All participants will have a complimentary lunch and hear our luncheon speaker, David D. Aughtry.

You may attend four one-hour workshops after lunch – two from Workshop Group I and two from Workshop Group II. Please list in preferential order your top two choices and an alternate from each workshop group. We will make every effort to schedule you in your top two choices from each workshop group; however, seating is limited and workshops will be filled on a first-come, first-served basis. Individual schedules of workshops will be distributed ONLY at the seminar; no written confirmations will be sent. No telephone reservations can be taken. If you have any questions, please call: Mary Beth Caracciolo at (713) 658-2500 or (800) 342-5829.

Fax with credit card: (713) 658-2553

E-Mail: marybeth.caracciolo@chamberlainlaw.com

Register Online: <https://www.chamberlainlaw.com/news-events-rsvp-110.html>

Atlanta

November 8, 2011

Advance Registration: \$100

CLE/CPE/CFP Credit Recommended:

Georgia Attorneys: CLE credit has been requested for attorneys

Georgia CPAs: 6 hours of CPE credit will be recommended

Georgia CFPs: Credit has been requested for Financial Planners

Group I: 1. _____ 2. _____ Alternate _____

Group II: 1. _____ 2. _____ Alternate _____

Mr./Ms.: _____

Title: _____ (CPA) _____ (CFP) _____ (Attorney)

Firm: _____

Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____ Fax: _____

E-Mail: _____

Visa MC Number: _____

Discover AmEx Number: _____

Exp. Date: _____ Signature: _____

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