

CHAMBERLAIN, HRDLICKA, WHITE, WILLIAMS & MARTIN
23rd ANNUAL TAX AND BUSINESS PLANNING SEMINAR
WEDNESDAY, DECEMBER 17, 2008

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 FOREVER OUGHT TO BE WORTH A LOT:
DEFENDING PERPETUAL CONSERVATION
EASEMENTS**

Seeing tax shelters behind every tree, the IRS is now trying to root out the tax benefits promised by Congress to donors of perpetual conservation easements. Review the legal requirements, valuation theories, substantiation standards, and strategies for defending the contribution of nature conservancies to the ages.

David D. Aughtry Charles T. Nunnally III

**IB LET'S KEEP THIS BETWEEN US:
EFFECTIVELY ASSERTING THE ATTORNEY-
CLIENT PRIVILEGE, TAX PRACTITIONER
PRIVILEGE, AND WORK-PRODUCT DOCTRINE
IN TODAY'S HOSTILE ENVIRONMENT**

With IRS enforcement on the rise, many taxpayers and their representatives find themselves under siege. The IRS often capitalizes on this pressure to seek (and unfortunately obtain) certain tax-related documents, even when they are not legally entitled to them. This presentation examines how to assert the attorney-client privilege, tax practitioner privilege, and work-product doctrine to the taxpayer's benefit.

Hale E. Sheppard Lori N. Millians

**IC WHOA NELLIE!...WHEN FURTHER EXPERTISE
IN CORPORATE AND INTELLECTUAL
PROPERTY LAW MAY BE PRUDENT**

As a front line advisor, you need to help your client identify the important issues. In this presentation, Nancy Gardner and Tom Jones will identify 10 corporate and IP concerns that you and your client should be considering.

Nancy K. Gardner Thomas E. Jones, Jr.

**LUNCHEON
TOPIC:**

**What's
Happening:
Judicial
Highlights**

*David D. Aughtry
and
George A. Hrdlicka*

*Advance Registration:
\$80*

*On-Site Registration:
\$95*

*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.

IID WHO'S YOUR DADDY?

From return preparation through defending a return you prepared or planned, to representation of couples, closely held companies, corporate officers, and compadres, the question of potential conflicts presents increasing challenges for every tax practitioner. This session will focus upon how you defuse, deal, or detach yourself from those conflicts.

*Moderator: Charles E. Hodges II
Panel: Rose Drupiewski George B. Abney*

**IIIE WHAT DOES THE FUTURE HOLD FOR THE
TAX CODE UNDER THE NEW PRESIDENT?**

"Change is inevitable – except from a vending machine." - Robert C. Gallagher. Because almost all of Bush's tax cuts are set to expire in 2010, change will occur even if the new Administration fails to act. In fact, the passage of the Emergency Economic Stability Act has already brought about real change. Assuming the new Administration implements their proposed changes, what does all this change mean for you and your clients? (And what does the senator who came in second have to say about it.)

J. Scot Kirkpatrick William E. Buchanan

IIIF GET A BETTER GRASP ON THAT QTIP!

Not merely fluff, the use of an inter-vivos QTIP is one of the best and most flexible estate tax, income tax, and asset protection options for most married couples.

James M. Kane Karen S. Kurtz

**IIIG HUNTING FOR GOODWILL IN ALL THE RIGHT
PLACES: OPTIMIZING PARTIES' POSITIONS
IN SALE TRANSACTIONS AND OTHER
GOODWILL ISSUES**

In this presentation, David Siegel and Nick Kory will discuss a variety of tax "goodwill" issues, primarily in the context of sales of businesses, opportunities for optimizing goodwill amortization and pitfalls to avoid. Personal goodwill and goodwill issues in partnership and related-party transactions will also be discussed.

David W. Siegel Nicolas F. Kory

Registration Form

(Check / Money Order / Credit Card)

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

Chamberlain, Hrdlicka, White, Williams & Martin
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 speakers, David D. Aughtry and George A. Hrdlicka.

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) 356-1001 or (713) 658-2553
E-Mail: marybeth.caracciolo@chamberlainlaw.com.

December 17, 2008

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 AmEx Number: _____

Exp. Date: _____ Signature: _____