

39TH ANNUAL

# Tax and Business Planning Seminar

**Monday, November 7, 2016**

**NEW LOCATION:**

The Westin Houston Memorial City  
945 Gessner Rd, Houston, TX 77024



HOUSTON • ATLANTA • PHILADELPHIA • SAN ANTONIO

3 9 T H A N N U A L

# Tax and Business Planning Seminar

CLE/CPE CREDIT RECOMMENDED  
Texas CPAs: 6 hours recommended  
Texas Attorneys: 5 hours recommended

**Register online:** [www.chamberlainlaw.com/  
news-eventsrsvp-205.html](http://www.chamberlainlaw.com/news-eventsrsvp-205.html)

**ADVANCE REGISTRATION: \$150**  
**Additional \$25 for On-Site Registration**

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

11:00am	Registration Begins
11:30am – 1:00pm	Complimentary Lunch
Noon – 1:00pm	Luncheon Presentation
1:05pm – 5:30pm	Workshops
5:30pm – 6:30pm	Reception

Our sound business understanding and comprehensive legal experience work for you and your clients. For over 50 years, Chamberlain, Hrdlicka, White, Williams & Aughtry has been producing results in all areas of practice.

#### AREAS OF PRACTICE INCLUDE:

ADMIRALTY LAW  
CIVIL RIGHTS  
COMMERCIAL LITIGATION  
CONSTRUCTION LAW  
CORPORATE, SECURITIES & FINANCE  
EMPLOYEE BENEFITS  
ENERGY  
ESTATE PLANNING  
EXEMPT ORGANIZATIONS  
IMMIGRATION  
INTELLECTUAL PROPERTY  
LABOR AND EMPLOYMENT LAW  
REAL ESTATE  
TAX LITIGATION AND CONTROVERSY  
TAX PLANNING  
WHITE COLLAR CRIMINAL DEFENSE

**HOUSTON**  
1200 Smith Street  
Suite 1400  
Houston, TX 77002  
800.342.5829

**ATLANTA**  
191 Peachtree Street, NE  
Forty-Sixth Floor  
Atlanta, GA 30303  
800.800.0745

**PHILADELPHIA**  
300 Conshohocken State Rd.  
Suite 570  
West Conshohocken, PA 19428  
610.772.2300

**SAN ANTONIO**  
112 East Pecan St.  
Suite 1450  
San Antonio, TX 78205  
210.253.8383

# FACULTY

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## **BARRY W. ADKINS**

University of Texas (B.B.A., *magna cum laude*, 1975); University of Texas School of Law (J.D., with honors, 1979)



## **HABEEB (HOBBS) GNAIM**

University of St. Thomas (B.B.A. in Economics, *summa cum laude*, 2000); Southern Methodist University Dedman School of Law (J.D., 2003); Georgetown University Law Center (LL.M. in Taxation, with distinction, 2004)



## **BRETT T. BERLY**

University of Texas at Austin (B.A., *cum laude*, 2001); University of Texas School of Law (J.D., *cum laude*, 2005)



## **PHYLLIS A. GUILLORY**

Louisiana State University (B.S., *summa cum laude*, 1991); University of Texas (J.D., with honors, 1994)



## **DAVID N. CALVILLO**

University of Texas-Pan American (B.B.A.); University of Texas School of Law (J.D.); Georgetown University Law Center (Executive LL.M.-Candidate, degree anticipated 2017)



## **PETER A. LOWY**

Hobart and William Smith Colleges (B.A., with honors, 1992); Tulane University Law School (J.D., *cum laude*, 1995); New York University School of Law (LL.M., 1997)



## **SEBASTIEN N. CHAIN**

University of Texas at Austin (B.A., with honors, 2005); University of Houston Law Center (J.D., *cum laude*, 2010); Georgetown University Law Center (LL.M. in Taxation, with honors, 2011)



## **J. PATRICK SHEETS**

University of Texas at Austin (B.S., B.A., 2009); South Texas College of Law (J.D., *summa cum laude*, 2012); New York University School of Law (LL.M. in Taxation, 2014; Advanced Professional Certificate in Law and Business)



## **JULIE G. EDELMAN**

Wake Forest University (B.A., 2006); University of Texas School of Law (J.D., 2011)



## **LAWRENCE SHERLOCK**

Stony Brook University (N.Y.) (B.S., 1972); Brooklyn Law School (J.D., *cum laude*, 1978)



## **NIMA FARZANEH**

University of Texas at Austin (B.A. in Economics, 2003); South Texas College of Law (J.D., *cum laude*, 2011); Georgetown University Law Center (LL.M. in Taxation, with distinction, 2012)



## **JUAN F. VASQUEZ, JR.**

University of Texas at Austin, McCombs School of Business (B.B.A., 1998); University of Houston Law Center (J.D., 2001); New York University School of Law (LL.M. in Taxation, 2002)

# AGENDA



## WORKSHOPS

Customize your experience by choosing four afternoon workshops. Choose two workshops from Group I and two workshops from Group II and indicate your selections on your registration form.

### Group I (Select 2 options)

#### GROUP IA

##### **When the Piggy Bank Needs a Passport**

OK - piggy banks don't need passports, but just as an international traveler would not leave home without one, an investor needs to know the special rules that apply to cross-border investments. More frequently, tax professionals are encountering US persons with foreign passive investments. This may be due to possibility for greater returns but it also can be because many clients inherit property from overseas or acquire property abroad during expat assignments. This session will focus on the special tax, reporting, and practical challenges of acquiring and holding these investments.

Presenters: Phyllis A. Guillory and Sebastien N. Chain

#### GROUP IB

##### **The Business, Legal, and Tax Aspects of Buying and Selling S Corporations: What You and Your Clients Need to Know**

Buying or selling a business may be the most important financial transaction a client ever makes. This speech will cover the most important business, legal, and tax aspects of buying or selling an S Corporation, the most common business entity in the United States. Besides providing insight into the best way to plan a transaction for tax purposes, it will also address due diligence and critical business and legal issues that may dramatically impact the transaction.

Presenter: Habeeb (Hobbs) Gnaim

#### GROUP IC

##### **In the Eye of the Beholder: The Art of Business Valuation**

Business valuations impact many aspects of tax and business planning, from Estate and Gift Tax issues to asset protection and litigation counseling. This presentation will peel back the mystery attached to the standard methodology utilized in placing a value on business enterprises. Attendees will leave oriented in the science and perhaps even the art of business valuations.

Presenter: David N. Calvillo

#### GROUP ID

##### **Goodbye TEFRA, Welcome (??) BBA: The New Partnership Audit Rules**

Starting in 2018 Partnerships can be taxpaying entities when they come under audit. There will be advantages and disadvantages to the new system, and the IRS is starting to issue regulations to implement it. The basic structure is here now, and some decisions may have to be made before it comes into force.

Presenter: Lawrence Sherlock

# LUNCHEON

## Prophetic City: Houston at the Cusp of a Changing America

**Presenter:** Stephen L. Klineberg, Ph.D.; Founding Director, Kinder Institute for Urban Research; Professor of Sociology, Rice University



### Group II (Select 2 options)

#### GROUP IIE

##### Contingent Consideration in Equity and Asset Acquisitions

A presentation and discussion of the income tax consequences of contingent consideration in equity and asset acquisitions, with a focus on the income tax consequences to both the seller and the buyer.

Presenters: Nima Farzaneh and Barry W. Adkins

#### GROUP IIF

##### Crash Course in Texas Taxes

This presentation will survey the Texas SALT systems for the franchise (a.k.a margins) tax, sales and use tax, property tax and other miscellaneous taxes in Texas; highlight recent developments at the Texas Comptroller's office; provide insights for navigating the tax procedure labyrinth when a client is audited or seeking to mitigate tax exposures; offer real-life examples of tax issues clients are facing; and identify opportunities to reduce your clients' taxes.

Presenters: Peter A. Lowy and J. Patrick Sheets

#### GROUP IIG

##### The Proposed §2704 Regulations: Is this Grinch Going to Steal Your Christmas?

We will discuss the Section 2704 proposed regulations and their impact on estate planning techniques. We will also cover the preparation of the new Form 8971, Information Regarding Beneficiaries Acquiring Property from a Decedent.

Presenters: Brett T. Berly and Julie G. Edelman

#### GROUP IIH

##### Judicial Highlights and Developments

A timely review of tax developments in the courts over the last year.

Presenter: Juan Vasquez, Jr.

# REGISTRATION FORM

**39TH ANNUAL TAX AND BUSINESS PLANNING SEMINAR** Monday, November 7, 2016

**Registration may be completed online at**  
[www.chamberlainlaw.com/news-eventsrsvp-205.html](http://www.chamberlainlaw.com/news-eventsrsvp-205.html)

Alternatively, you may fill out the form below and mail it along with a check/money order payable to:  
Chamberlain Hrdlicka, Attention: Tiffany Fayle, 1200 Smith Street, Suite 1400, Houston, Texas 77002  
Forms may also be faxed with credit card information to: 713.658.2553

## REGISTRATION FEES

**Early registration (prior to November 7, 2016): \$150 • On-site registration: \$175**

Mr./Ms. \_\_\_\_\_ Firm \_\_\_\_\_  
Title \_\_\_\_\_  CPA  Attorney  CFP  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Telephone \_\_\_\_\_ Fax \_\_\_\_\_ Email \_\_\_\_\_  
 VISA  MC  AMEX  DISCOVER Card Number \_\_\_\_\_  
Exp. Date \_\_\_\_\_ Signature \_\_\_\_\_

## WORKSHOPS

You are able to attend four 60-minute afternoon workshops. Please indicate your selections by:

1. Choose two workshops and a third/alternate workshop from Group I.
2. Choose two workshops and a third/alternate workshop from Group II.
3. Indicate your choices by ranking them (place a "1" next to your first choice; a "2" next to your second choice; and a "3" next to your third/alternate choice).

### Group I

- A. When the Piggy Bank Needs a Passport**  
Phyllis A. Guillory and Sebastien N. Chain
- B. The Business, Legal, and Tax Aspects of Buying and Selling S Corporations: What You and Your Clients Need to Know**  
Habeeb (Hobbs) Gnaim
- C. In the Eye of the Beholder: The Art of Business Valuation**  
David N. Calvillo
- D. Goodbye TEFRA, Welcome (??) BBA: The New Partnership Audit Rules**  
Lawrence Sherlock

### Group II

- E. Contingent Consideration in Equity and Asset Acquisitions**  
Nima Farzaneh and Barry W. Adkins
- F. Crash Course in Texas Taxes**  
Peter A. Lowy and J. Patrick Sheets
- G. The Proposed \$2704 Regulations: Is this Grinch Going to Steal Your Christmas?**  
Brett T. Berly and Julie G. Edelman
- H. Judicial Highlights and Developments**  
Juan Vasquez, Jr.

We will make every effort to schedule you in your top two choices in each group; however, seating is limited and workshops will be filled on a first-come, first-served basis. Your workshop schedule will be provided at the seminar. No telephone reservations can be taken and no written workshop confirmations will be sent.

If you have any questions, please contact Tiffany Fayle at 713.658.1818 and [tiffany.fayle@chamberlainlaw.com](mailto:tiffany.fayle@chamberlainlaw.com).

# JOIN OUR TAX FORUM!

Our Tax Forums include breakfast, an informative discussion of tax topics, and a current events update. A written outline of the discussion is always provided. Our Tax Forums meet at two locations in the Houston area. Sign up below and we will regularly e-mail you a notice before each meeting. You may then make a reservation if you plan to attend. It's easy!

## MONTHLY TAX FORUMS

Begin at 7:15 am – 2 hours of CPE Credit Recommended

1.75 hours of CLE Credit Recommended

**WEST LOOP AREA**

Houstonian Hotel

111 N. Post Oak Lane, Houston

Meets second Wednesday: \$45

**WEST HOUSTON AREA**

Lakeside Country Club

100 Wilcrest Drive, Houston

Meets fourth Wednesday: \$45

Mr./Ms. \_\_\_\_\_ Firm \_\_\_\_\_

Title \_\_\_\_\_  CPA  Attorney  CFP

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone \_\_\_\_\_ Fax \_\_\_\_\_ Email \_\_\_\_\_

**Register Online: [www.chamberlainlaw.com](http://www.chamberlainlaw.com)**

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

**Chamberlain, Hrdlicka, White,**

**Williams & Aughtry**

1200 Smith Street, Suite 1400

Houston, TX 77002

713.658.1818

**Attention: Tiffiny Fayle** at [tiffiny.fayle@chamberlainlaw.com](mailto:tiffiny.fayle@chamberlainlaw.com)

Fax to: 713.658.2553

Please duplicate this form if necessary.



Chamberlain Hrdlicka  
Attorneys at Law

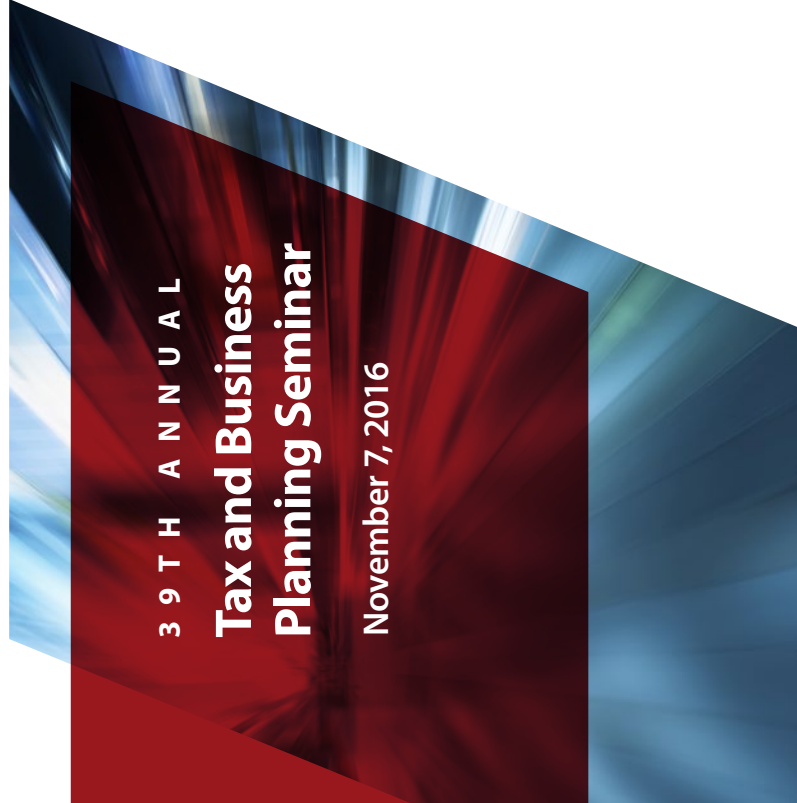


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