

31st Annual

Tax and Business Planning Seminar

Tuesday, December 6, 2016

Cobb Galleria Centre
Atlanta, Georgia



Chamberlain Hrdlicka
Attorneys at Law

Atlanta Houston Philadelphia San Antonio

Chamberlain, Hrdlicka, White, Williams & Aughtry

ATTORNEYS AT LAW

FACULTY

- DAVID D. AUGHTRY** The Citadel (B.A., 1975); University of South Carolina (M. Acct., 1978); University of South Carolina (J.D., 1978); Emory University (LL.M. Taxation, 1982)
- SCOTT A. AUGUSTINE** Oberlin College (B.A., 1993); Case Western Reserve University (J.D., *cum laude*, 1997)
- C. REID BARRINEAU** Virginia Tech (B.A., *summa cum laude*, 2008); University of Mississippi (J.D., *magna cum laude*, 2011); University of Florida (LL.M. in Taxation, 2012)
- CASSANDRA S. BRADFORD** Mercer University (B.A., International Affairs, 2010); Georgia State University (J.D., 2005; MBA, 2015)
- JOHN W. HACKNEY** University of Virginia (B.S., 2003; M.S., 2004); University of Georgia (J.D. *cum laude*, 2009)
- JASEN D. HANSON** University of North Florida (B.A., 2011); St. Thomas University School of Law (J.D., 2014); University of Florida (LL. M. Taxation, 2015)
- THOMAS E. JONES, JR.** Emory University (B.A., *magna cum laude*, 1971); University of Georgia School of Law (J.D., *magna cum laude*, 1974)
- J. SCOT KIRKPATRICK** Emory University (B.A., 1979); Wake Forest University (J.D., 1982); New York University (LL.M. Taxation, 1984)
- PATRICK J. MCCANN, JR** Wake Forest University, B.A. December 2005; University of Virginia School of Law, J.D., May 2006; University of Florida Levin College of Law, LL.M. in Taxation
- COURTNEY H. MOORE** James Madison University (B.S.); Mercer University (J.D.)
- HALE E. SHEPPARD** University of Kansas (B.S., with honors, 1993; M.A., with distinction, 1999; J.D., 1997); University of Chile (LL.M., with highest distinction, 1999); University of Florida (LL.M. Taxation, 2003)
- CHRISTOPHER A. STEELE** Georgia State University (B.B.A., 2002) Mercer University (J.D., 2011); University of Florida (LL.M. in Taxation, 2012)
- STEVEN M. WYATT** The University of Alabama (B.S., Accounting, 1992; J.D., 1996); New York University (LL.M. in Taxation, 1997)

In the beginning, clients retained Chamberlain, Hrdlicka to resolve tax issues. Aggressive young lawyers who served with distinction as trial lawyers in the United States Department of Justice and the Internal Revenue Service founded the firm, which currently offers more than 650 years of combined experience in tax planning and tax controversy.

Today, depth and breadth in tax law benefit all of Chamberlain, Hrdlicka's clients, but the firm is far more than just a tax firm. Chamberlain, Hrdlicka represents individuals, partnerships, and corporate clients in a broad range of business advisory, transactional, and litigation matters, with offices in Houston, Philadelphia, Atlanta, and San Antonio.

Nationally-recognized lawyers with Chamberlain, Hrdlicka include many who have served as judges, adjunct professors of law, distinguished legal writers, and lecturers. Their knowledge, experience, and novel approaches lead to creative solutions, quicker results, and "more bang for the buck."

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Cobb Galleria Centre
Two Galleria Parkway
Atlanta, Georgia 30339

Ballroom F Pre-Function Area
Second Floor
Complimentary Parking

**CLE Credit has been requested for attorneys
6 hours of CPE credit recommended for Georgia CPAs**

Register-Online: <https://www.chamberlainlaw.com/news-eventsrsvp-206.html>

Advance Registration: \$135

On-site Registration: \$150

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

| | |
|-------------------------|-----------------------|
| 11:00 a.m. | Registration Begins |
| 11:30 a.m. - 12:35 p.m. | Complimentary Lunch |
| 11:30 a.m. - 12:35 p.m. | Luncheon Presentation |
| 12:45 p.m. - 5:30 p.m. | Workshops |
| 5:30 p.m. - 6:30 p.m. | Reception |

LUNCHEON TOPIC

JUDICIAL, STATUTORY, AND REGULATORY DEVELOPMENTS

PRESENTED BY
DAVID D. AUGHTRY

Estate & Gift valuation disputes are back with a vengeance, while conservation easements and captive insurance companies continue to garner attention. In the meantime, Congress created massive confusion with its "repeal" of the TEFRA Partnership Procedures and effectively granting the power to repeal passports of delinquent taxpayers. Quite a year!

WORKSHOP GROUP I

A

What Do My Anchor Clients Need to Do Now in Light of the Proposed Section 2704(b) Regulations and What Discounts Remain Unaffected?

presented by Christopher A. Steele and Steven M. Wyatt

The proposed Section 2704(b) regulations – which could conceivably take effect as early as December 30, 2016 – stretch the statutory delegation into an attempt to override “fair market value” by outlawing most estate & gift tax business valuation discounts. To the extent those regulations become final, the train is leaving the station and so we need to act now. Once that train leaves, what can we still do to protect our clients?

WORKSHOP GROUP I

B

What Does the Election Mean to Our Anchor Clients – Nothing Succeeds Like Secession?

presented by David D. Aughtry, Thomas E. Jones and Jasen D. Hanson

The process that gave us two despicable candidates – both of whom undermine the virtues of the free enterprise system – leaves our anchor clients facing radical tax proposals. What do our clients face and, as a practical matter, how do we protect them?

WORKSHOP GROUP I

C

**Dramatic Changes and Lessons Learned in Protecting Clients from
Audit through Appeals to Litigation**

presented by John W. Hackney and Patrick J. McCann, Jr.

Everyone who defends partnership returns must know the critical audit decisions required by the TEFRA repeal and the Service's more aggressive summons approach. Everyone who defends clients going to Appeals must know about the struggle between the historic function of an Appeals Officer as a de facto administrative law judge and the National Office transition to detached "campus" video conferences and telephone calls. And everyone who defends the administratively abused seeking vindication in Tax Court must know the opportunities that presents.

WORKSHOP GROUP II

D

**What Changes Need to Be Made to Every LLC and
Partnership Agreement Due to the Repeal of the TEFRA
Partnership Procedures?**

presented by Scott A. Augustine and C. Reid Barrineau

Beginning in 2017, the so-called TEFRA repeal creates horrible fiduciary and partner conflict that desperately needs to be resolved through amendment to every LLC and partnership agreement. What are those changes, how do they need to be made, and when?

WORKSHOP GROUP II

E

Captivating Changes That Require Immediate Action

presented by J. Scot Kirkpatrick and Courtney H. Moore

The perfect storm of small captive insurance company changes and the IRS proposed Section 2704(b) regulations raises critically important planning concerns which must be immediately addressed for every small captive insurance company. Furthermore, three recent taxpayer victories for Section 831 (a) large captives, and the three cases awaiting decision in Tax Court on Section 831 (b) small captives must be understood by all who practice in this area.

WORKSHOP GROUP II

F

**International Tax Compliance and Disputes:
The Latest and Greatest**

presented by Hale E. Sheppard and Cassandra S. Bradford

The IRS now receives more data than ever about foreign activities thanks to agreements with foreign banks, compliance with FATCA, mandatory e-filing of FBARs, computerized cross-checking of foreign assets disclosed on Form 8938, automatic-penalty programs for late international information returns, whistleblowers seeking large rewards, the infamous "Panama Papers," and many other sources. For its part, Congress continues to enact more compliance duties, higher penalties, and longer assessment periods. This triggers more focus than ever on international audits and disputes. This presentation surveys the latest and greatest, helping non-specialists better understand the newest issues.

31st

Annual Reservation Form

Tax and Business Planning Seminar

Tuesday, December 6, 2016

Registration Fee: Advance \$135 On-Site \$150
(Check, Money Order, or Credit Card)

Register-Online: https://www.chamberlainlaw.com/news-eventsrsvp-206.html

You may attend four one-hour workshops after lunch - two from Workshop Group 1 and two from Workshop Group II. Please list in preferential order your top two choices and an alternative 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:

TIFFINY Y. FAYLE:

(713) 658-2500 or (800) 342-5829

Fax: (713) 658-2553

E-Mail: tax.registration.atl@chwwa.com

CLE/CPE

Georgia Attorneys: CLE credit has been requested for attorneys
Georgia CPAs: 6 hours of CPE credit will be recommended

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 Address _____

[] VISA [] MC [] AMEX [] DISCOVER

Number: _____

Exp. Date: _____

Signature: _____

Please duplicate this form if necessary.

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

Chamberlain, Hrdlicka, White, Williams & Aughtry

191 Peachtree Street, N.E., Forty-Sixth Floor Atlanta, Georgia 30303

Attention: Tiffany Y. Fayle

JOIN OUR TAX FORUM!

Our Tax Forums are generally held four times a year and include breakfast, an informative discussion of tax topics, and a current events update. A written outline of the discussion is always provided. 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!

COBB GALLERIA TAX FORUM

Cobb Galleria Centre
Two Galleria Parkway
Atlanta, Georgia 30339

2 HOURS OF CPE CREDIT RECOMMENDED
1.8 HOURS OF CLE CREDIT RECOMMENDED

The tax forum begins at 7:15 a.m.
The registration fee is \$45

Mr./Ms. _____ Title: CPA Attorney

Firm _____

Address _____

City _____ State _____ Zip _____

Telephone _____ Fax _____

E-Mail Address _____

Date _____

Please duplicate this form if necessary.

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**Chamberlain, Hrdlicka, White,
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191 Peachtree Street, N.E., Forty-Sixth Floor
Atlanta, Georgia 30303
Attention: **Tiffany Y. Fayle**

Chamberlain, Hrdlicka, White, Williams & Aughtry

ATTORNEYS AT LAW

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 for clients in all areas of practice.

AREAS OF PRACTICE INCLUDE:

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EMPLOYEE BENEFITS
ENERGY
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IMMIGRATION
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INTERNATIONAL
LABOR & EMPLOYMENT LAW
REAL ESTATE
TAX LITIGATION & CONTROVERSY
TAX PLANNING

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(210) 253-8383



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