



MEADOWS COLLIER

ATTORNEYS AT LAW

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

TAXATION

18

Taxing Times:
Planning and Defending in an
Uncertain Tax and IRS Environment

Conference Qualifies for 10 CPE Hours and 8.25 MCLE Hours

Fee: \$245 Per Person

The 18th Annual Meadows Collier Conference
Tuesday, October 25, 2016

Cityplace Conference Center
DALLAS, TEXAS

Tuesday, October 25

7:00 a.m. - 8:00 a.m.

8:00 a.m. - 8:55 a.m.

8:55 a.m. - 9:50 a.m.

9:50 a.m. - 10:05 a.m.

10:05 a.m. - 11:30 a.m.

11:30 a.m. - 12:45 a.m.

12:45 a.m. - 1:45 p.m.

1:45 p.m. - 2:40 p.m.

2:40 p.m. - 2:55 p.m.

2:55 p.m. - 4:05 p.m.

4:05 p.m. - 5:05 p.m.

5:05 p.m. - 6:05 p.m.

TAXING TIMES: Planning and Defending in an Uncertain Tax and IRS Environment

Registration and Continental Breakfast

Offshore Tax Controversy Update: What's on the Horizon?

Offshore tax compliance continues to top the IRS's priority list as the IRS mines inside information it has received from its investigative initiatives and voluntary compliance programs. While the landscape is changing, there are still a number of options available to taxpayers to remedy past non-compliance. And if a taxpayer's non-compliance is discovered during examination, it is more important than ever for the taxpayer to navigate the issues carefully to mitigate potentially exorbitant civil or even criminal penalties. This presentation will discuss the current status of voluntary compliance initiatives, methods for addressing offshore compliance issues in examination, the landscape for post-examination appeals and litigation of offshore penalties, and the prevailing legal guidance for offshore tax compliance.

Mary E. Wood, J.D.

Global Warming: Hot Topics in International Taxation

Taxpayers increasingly engage in international transactions, and electronic commerce continues to expand worldwide. Meanwhile, U.S. income tax principles applying to international transactions have remained substantially unchanged for the last thirty years. This situation has created a great deal of uncertainty (and potential opportunities and traps) in the operation of U.S. tax laws to cross-border activities. This presentation will focus on those areas of uncertainty and the manner in which planners can help navigate them for their clients' benefit.

Stephen A. Beck, J.D., LL.M. • Matthew L. Roberts, J.D., LL.M.

Break

What Every CPA Needs to Know About the New IRS Partnership Audit Rules

At the end of 2015, Congress enacted new partnership audit rules that will impact every partnership. This is a seismic shift in the way in which the IRS audits partnerships. TEFRA is going away and in its place is a set of rules that among other things will allow the IRS to collect tax from the partnership instead of the partners. Learn about the new provisions, how they will impact IRS audits and changes that will need to be considered for all partnership agreements to address these new rules.

Joel N. Crouch, J.D. • Thomas G. Hineman, J.D., LL.M. • Charles D. Pulman, J.D., LL.M., CPA

Luncheon Presentation – Tax Practice: Rules of the Road

Tax practice is one of the most rewarding — if not the most rewarding — areas to practice. When everything is moving along smoothly, there is nothing like it. But the roads are not always paved smooth. What does a tax practitioner do when there is a pothole in the road? Hopefully you see it in advance and avoid it. But in many cases, you will drive right into it. After you hit the pothole, you want as little damage as possible. This presentation will focus on identifying those potholes and if you are in one, how to minimize the damage.

Josh O. Ungerman, J.D., CPA

The Tug of War That is Texas Tax

When the relentless effort to minimize tax liability converges with a state's relentless effort to generate tax revenue, stuff happens. The past several months have seen significant developments on issues involving various aspects of the Texas franchise tax with some having the potential of upending the Comptroller's computation of the tax liability. In addition, significant developments in the sales tax context could spell potential trouble for some taxpayers and opportunities for others. And yet another significant nexus case is headed for the U.S. Supreme Court with potentially broad-reaching implications for all states, including Texas. Learn of these recent developments and their potential implications.

David E. Colmenero, J.D., LL.M., CPA

The Heimlich for Taxpayer Past Misdeeds

This presentation addresses ways to resolve prior year non-compliance and how those options can differ depending on whether the taxpayer has already been contacted by the government or not. Key topics that will be reviewed include (a) resolving issues pertaining to unreported income, (b) employees paid in cash, (c) misclassified expenses, (d) overstated inventory, and (e) addressing past wrongdoing that may need to be addressed when a business is being sold.

Michael A. Villa, Jr., J.D., LL.M.

Break

2016 Estate Planning Update – Proposed Regulations Issued For Valuation Under Section 2704 and Basis Reporting Under Section 1014(f)

In August 2016, Treasury published proposed regulations with respect to the valuation of interests in corporations and partnerships for Federal transfer tax purposes. Importantly, the proposed regulations include new rules for the treatment of restrictions on liquidation in determining the value of transferred interests. Treasury also published, in March 2016, proposed regulations that provide guidance regarding (i) the requirement that a recipient's basis in certain property acquired from a decedent be consistent with the value of the property as finally determined for Federal estate tax purposes, and (ii) reporting requirements for executors required to file Federal estate tax returns. This presentation will include an overview of the new rules and a discussion of estate planning implications.

Alan K. Davis, J.D., CPA • Eric D. Marchand, J.D., LL.M. • Matthew S. Beard, J.D., LL.M.

Matters of Interest

Sometimes a title says it all. Learn about (i) taxation of settlements and lawsuit payments and recoveries; (ii) reasonable compensation versus dividends for professionals in C corporations; (iii) estate tax cases and litigation matters, including the long-awaited regulations under IRC §2704 aimed at disallowing discounting; (iv) tax issues of transfers to special friends; (v) issues associated with mortgage interest deductions; (vi) deductions for marijuana business expenses; (vii) definition of bona fide resident; (viii) deductions for cell phones, parking and other unreimbursed business expenses incurred by professionals; and (ix) other tax cases which crossed desks at Meadows Collier during 2016.

Charles M. Meadows, Jr., J.D., CPA • William R. Cousins, III, J.D., LL.M., CPA

Enjoy a Complimentary Networking Reception



MEADOWS COLLIER

ATTORNEYS AT LAW

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

Effective legal counsel for a complex world

Meadows, Collier, Reed, Cousins, Crouch & Ungerman, L.L.P. is a Texas-based law firm. Our attorneys bring both dedication and experience to our clients' legal matters. While our origins were in tax planning and tax litigation practice, we also provide counsel to clients with a variety of other specialized legal issues, including business and estate planning, probate, real estate, corporate, banking and commercial litigation. We also have a long-standing concentration in the area of white collar defense and government regulatory practice.

What Distinguishes Us

- Thirty-three (33) years representing a broad cross-section of businesses and individuals in high-stakes litigation and complex tax, corporate and commercial transactions.
- Highly experienced and specialized lawyers — 10 Texas Board Certified attorneys covering areas of Tax Law, Estate Planning and Probate Law, and Commercial Real Estate Law; 14 holders of advanced law degrees (LL.M.) in Taxation; 8 CPA/lawyers; 6 former Federal Judicial Clerks; and 1 adjunct law school professor.
- A mid-size firm dedicated to delivering superior client service.

Visit our website at www.meadowscollier.com and our blog, MC Talks Tax, at www.meadowscollier.com/?p=7664.

TAXING TIMES: Planning and Defending in an Uncertain Tax and IRS Environment

The 18th Annual Meadows Collier Conference
Tuesday, October 25, 2016

Check your registration email confirmation for the website address and password to access the conference materials. Materials will be available beginning October 18, 2016 to paid conference registrants.

Registration Options

- If paying by credit card (MasterCard, Visa or Discover) go to <https://secure.lawpay.com/pages/meadowscollier/conferenceregistration> to complete the registration form and pay the conference fee using LawPay.
- If paying by check, please complete the registration form in the brochure or go on-line to <http://www.meadowscollier.com/?p=7139> to print the registration form and mail with a check payable to Meadows, Collier, Reed, Cousins, Crouch & Ungerman, L.L.P. to:

Susan House, Marketing Manager
Meadows, Collier, Reed, Cousins, Crouch & Ungerman, L.L.P.
901 Main Street, Suite 3700
Dallas, TX 75202

Direct all inquiries to:

Susan House, Marketing Manager
Meadows, Collier, Reed, Cousins, Crouch & Ungerman, L.L.P.
Phone: (214) 744-3700 or (800) 451-0093, Ext 2411
Fax: (214) 292-2377
E-mail: shouse@meadowscollier.com

Registration Form Please type or print. Photocopies accepted.

Name: _____

Company/Firm: _____

Mailing Address: _____

City: _____

State: _____ Zip: _____

Business Phone: (____) _____

Home Phone: (____) _____

Fax: (____) _____

E-mail: _____

CPA Certificate #: _____ State: _____

Bar Membership #: _____ State: _____

Registration Fee: \$245 PER PERSON Code: MC

Total Amount: \$ _____

Method of Payment: Check

GENERAL INFORMATION

Program Date: Tuesday, October 25, 2016

Registration and Continental Breakfast: 7:00 a.m. – 8:00 a.m.

Breaks: 9:50 a.m. – 10:05 a.m. and 2:40 p.m. – 2:55 p.m.

Lunch: Provided as part of the registration fee from 11:55 a.m. – 1:10 p.m.

Networking Reception: Attend a complimentary networking reception immediately following the conclusion of the conference at 5:05 p.m.

Fee: \$245 Per Person

CPE Hours: 10 Hours, Sponsor ID # 08150

MCLE Hours: 8.25 Hours, Course # 901362460

Program Materials: Materials will be available for download by paid conference attendees via the firm's website at www.meadowscollier.com beginning October 18, 2016. Website and password to access materials will be provided in your registration email confirmation. Each paid conference attendee will also receive the conference materials on a flash drive at the conference.

Program Site: Cityplace Conference Center, 2711 North Haskell, Dallas, TX 75204, (214) 515-5100

Parking @ Cityplace Conference Center: Validated Free Parking

Suggested Hotel Accommodations:

Warwick Melrose Hotel, 3015 Oak Lawn Avenue, Dallas, TX 75219
Phone: (214) 521-5151 or (800) 203-3232, Fax: (214) 521-2470
Web: <http://warwickhotels.com/dallas/>

Hotel Crescent Court, 400 Crescent Court, Dallas, TX 75201
Phone: (214) 871-3200 or (800) 687-6043, Fax: (214) 871-3272
Web: www.crescentcourt.com

Omni Dallas Hotel, 555 S. Lamar, Dallas, TX 75202
Phone: (214) 744-6664, Fax: (214) 979-4595
Web: www.omnihotels.com/hotels/dallas

Suggested Hotel Accommodations, continued:

Dallas Marriott City Center, 650 N. Pearl St., Dallas, TX 75201
Phone: (214) 979-9000, Fax: (214) 953-1931
Web: www.marriott.com/hotels/travel/dalddt-dallas-marriott-city-center/

W Dallas Victory Hotel, 2440 Victory Park Lane, Dallas, TX 75219
Phone: (214) 397-4100, Fax: (214) 397-4105
Web: www.wdallasvictory.com

The Westin Dallas Downtown, 1201 Main Street, Dallas, TX 75202
Phone: (972) 584-6650, Fax: (972) 584-6655
Web: www.starwoodhotels.com/westin/property/overview/index.html?propertyID=4268

Note: The DART light rail runs to and from Cityplace Conference Center from downtown Dallas.

Check-in Time: 3:00 p.m. (Times vary, please verify with hotel.)

Check-out Time: 11:00 a.m. - 12 Noon (Times vary, please verify with hotel.)

Registration: The registration form must be accompanied with the conference fee. If paying by check, please make checks payable to Meadows, Collier, Reed, Cousins, Crouch & Ungerman, L.L.P. and mail to the firm address. If paying by credit card, (MasterCard, Visa or Discover) go to <https://secure.lawpay.com/pages/meadowscollier/conferenceregistration> to complete the registration form and pay the conference fee using LawPay.

Cancellation: Full refunds will be accepted on or before the program date. Individuals who “no show” at the conference will forfeit the entire registration fee. Substitutions are welcome.

Cellular Phones: Please turn off cellular phones while the conference is in session.

Recording Devices: All audio and video recording devices are prohibited at the conference without prior written permission from Meadows Collier.

Smoking: The Cityplace Conference Center is a “smoke-free” facility.