



MEADOWS COLLIER

ATTORNEYS AT LAW

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

NEW FOR 2017!

In Addition to the Seminar - NEW THIS YEAR **LIVE STREAMING**
and **GROUP DISCOUNTS** Available. See inside for details.

T A X A T I O N

19

**EMBRACING THE NEW NORM:
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 19th Annual Meadows Collier Conference
Tuesday, October 24, 2017

Cityplace Conference Center
DALLAS, TEXAS

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Meadows Collier



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EMBRACING THE NEW NORM: Planning and Defending in an Uncertain Tax and IRS Environment

Registration and Continental Breakfast

Tuesday, October 24

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

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

New Partnership Audit Rules: What They Mean to Partnerships and Tax Professionals

This presentation analyzes Congress' new set of rules and IRS regulations that govern partnership audits, which radically change how partnerships are audited by the IRS and, among other things, do away with the concept of a tax matters partner. Become aware of the new rules and regulations and potential implications before they take effect in 2018. Learn how partnership agreements may need to be revised and possibly renegotiated before the new rules and regulations take effect and how important elections must be made on timely-filed tax returns.

Joel N. Crouch, J.D. • Charles D. Pulman, CPA, J.D., LL.M. • Matthew "Matt" L. Roberts, J.D., LL.M.

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

"Pass-Through" Entities: Recent Developments and Hot Topics

The Federal income taxation of Subchapter S corporations and Subchapter K partnerships has recently been the subject of important guidance. In addition, Congress is presently considering tax reform proposals that would materially change the manner in which the income of S corporations and partnerships is taxed. This presentation will discuss significant recent developments impacting S corporations and partnerships, as well as potential changes looming on the horizon.

Stephen "Steve" A. Beck, J.D., LL.M.

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

Break

10:05 a.m. - 11:00 a.m.

Navigating the World of IRS Audits of Tax Exempt and Government Entities

This presentation will cover some of the unique aspects of the IRS TE/GE examination and why the practitioner should be on high alert if working on TE/GE issues. These types of audits present: (1) pyramiding excise taxes, some of which the reasonable cause defense will be inapplicable to, (2) rarely seen penalties, that a tax practitioner may be unexpectedly forced to evaluate, and (3) unusual conflict of interest issues. Learn this and more when navigating the world of IRS TE/GE audits.

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

11:00 a.m. - 11:55 a.m.

Tax Aspects of Divorce

The Internal Revenue Code includes special tax rules for divorce. This presentation provides an overview of the rules with practical considerations, including (1) what constitutes alimony, (2) how income is shifted under the alimony rules, (3) the tax treatment of child support, (4) nonrecognition for the transfer of appreciated property incident to a divorce, and (5) options for filing tax returns following divorce.

Matthew "Matt" S. Beard, J.D., LL.M.

11:55 a.m. - 1:10 p.m.
Lunch with Speakers

How the 2017 Announced IRS LB&I Compliance Campaigns are a Predictor of the Future Direction of IRS Examinations

This presentation will cover the 2017 LB&I compliance campaigns. These compliance campaigns represent a new enforcement approach by the IRS, focusing on specific issues with a risk on non-compliance as opposed to identifying taxpayer tax returns to examine and uncover issues. In the same way the wealth squad holistic examination approach filtered down from LB&I to SB/SE, tax practitioners should expect this compliance campaign approach to filter down as well. The presentation will include examples of the IRS already implementing this issue-centric approach in routine SB/SE examinations and what may become routine examination enforcement compliance campaigns in the future.

Josh O. Ungerman, CPA, J.D. • Mary E. Wood, J.D.

1:10 p.m. - 2:05 p.m.

The Ultimate Survival Kit: Navigating Your Client Through an Audit by the Texas Comptroller

An audit by the Texas Comptroller can be a stressful process for both taxpayers and practitioners. Seldom is a taxpayer ever satisfied with receiving a tax assessment from the State of Texas. This presentation will discuss the "do's" and "don'ts" for successfully navigating your client through the audit process. Learn also of recent developments at the Texas Comptroller's office and how they may affect your clients in future audits. Further, this presentation will discuss options for challenging an auditor's findings.

David E. Colmenero, CPA, J.D., LL.M. • Alex J. Pilawski, J.D.

2:05 p.m. - 3:00 p.m.

Is There No Limit to International Information Reporting?

This presentation will focus on the IRS' recent expansion of the international information reporting obligations, and taxpayers' attempts to fight back. The presentation will include a discussion of the impact of Treasury Regulations finalized within the past year, recent guidance from the IRS on "substantially complete" international information returns, and the success of taxpayer challenges in 2017.

Aaron P. Borden, CPA, J.D.

3:00 p.m. - 3:15 p.m.

Break

3:15 p.m. - 4:05 p.m.

Big and Small — Estate Tax Updates and Planning for Clients without Estate Tax Issues

Mr. Davis will bring you up-to-date on important and timely estate and gift tax updates including law changes, cases and notices necessary for you to advise your bigger clients. Mr. Marchand will arm you with planning ideas designed to meet the needs of your clients without estate and gift tax issues.

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

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

CPA as a Target?

The government doesn't treat CPAs as conspirators, aiders and abettors, or codefendants, do they? Believe it or not, the last two years have shown an increase in the number of criminal and civil cases involving CPAs. This presentation offers a brief survey of these cases and suggests ways to avoid being caught in this situation. If convicted in a federal criminal case, the fact that a defendant holds a CPA license may result in an additional sentence of 12-24 months. The time is now to choose your clients wisely.

Charles (Chuck) M. Meadows, Jr., CPA, J.D.

5:05 p.m.

Conference Adjourns and Networking Reception



MEADOWS COLLIER

ATTORNEYS AT LAW

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

Founded in 1983, Meadows Collier is recognized nationally for its expertise in all areas of taxation. The firm represents a cross-section of businesses and individuals in high-stakes litigation and complex tax and business matters, including federal and state tax income tax, wealth planning, corporate, real estate, and other commercial transactions. Firm attorneys provide effective representation for clients when facing the most complex or sensitive matters.

The firm is distinguished with its highly experienced lawyers who are Texas Board Certified in tax law, estate planning and probate law, and commercial real estate law. Firm lawyers also hold advanced law degrees (LL.M.) in Taxation and are also Certified Public Accountants, as well as former federal judicial clerks and current adjunct law professors.

EMBRACING THE NEW NORM: Planning and Defending in an Uncertain Tax and IRS Environment

The 19th Annual Meadows Collier Conference Tuesday, October 24, 2017

CONFERENCE MATERIALS: Check your registration email confirmation for the website address and password to access the conference materials for those attending the conference at CityPlace. Materials will be available beginning October 17, 2017.

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

Live Streaming Information

The Live Stream for the 19th Annual Meadows Collier Tax Conference is being hosted by BPN Media and the Accounting CPE Network. The live stream can be viewed on any computer or mobile device and is compatible with most browsers. Both audio and video will be delivered through the computer, there is no telephone required. Once you are registered, you will have access to a link to test the system. Questions for the speakers may be submitted online during the conference.

If you have additional questions related to the Live Streaming registration or technical requirements, please contact support.
Email: help@bpnmedia.com • Phone: (877) 602-9877

To Register go online to: <https://bpnmedia.ce21.com/item/19th-annual-meadows-collier-taxation-conference-199019>

The CPE Credit for the Live Streaming will be issued by: Business Professionals' Network, Inc. (ACPEN), NASBA Registry ID#: 107810, TSBPA Sponsor #: 008900, IRS Credit (Available Upon Request).

For questions related to the CPE Credit for the Live Streaming contact Anne Taylor at anne.taylor@acpen.com or (972) 377-8199.

Group Discounts

The discounts available include 10% for three (3) or more participants and 20% for six (6) or more participants. For groups of ten (10) or more participants, contact Susan House, Marketing Manager, at Meadows Collier for special pricing at shouse@meadowscollier.com or (214) 744-3700.

CONFERENCE - to register a group with a discount, complete a registration form for each registrant and mail with a check payable to Meadows Collier to Susan House, Marketing Manager, Meadows, Collier, Reed, Cousins, Crouch and Ungerman, L.L.P., 901 Main Street, Suite 3700, Dallas, TX 75202.

LIVE STREAMING - to register a group with a discount, contact Anne Taylor at (972) 377-8199 or anne.taylor@acpen.com.

Conference 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 24, 2017

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

Breaks: 9:50 a.m. – 10:05 a.m. and 3:00 p.m. – 3:15 p.m.

Lunch: 11:55 a.m. – 1:10 p.m. Lunch is provided for Conference participants.

Networking Reception: Attend a complimentary networking reception immediately following the conclusion of the conference.

Fee: \$245 Per Person for Seminar or Live Streaming. Group Discounts are available at 10% for three (3) or more participants, 20% for six (6) or more participants, and for groups of 10 or more, contact Susan House, Marketing Manager, at Meadows Collier for special pricing at shouse@meadowscollier.com or (214)744-3700.

CPE Hours: 10 Hours, Sponsor ID # 08150 Note: The CPE Credit for the live streaming will be issued by Business Professionals' Network, Inc. (ACPEN)

MCLE Hours: 8.25 Hours, Conference Course #928011729

Program Materials: Materials will be available beginning October 17, 2017. Conference Attendees – the link to the conference materials will be included in your registration confirmation email. Live Streaming participants – information and instructions regarding the program materials will be sent by BNP Network to those registered prior to 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 (888)627-8229
Web: <http://warwickhotels.com/dallas/>

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

Suggested Hotel Accommodations (continued):

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

Dallas Marriott City Center, 650 N. Pearl St., Dallas, TX 75201
Phone: (214) 979-9000
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
Web: www.wdallasvictory.com

The Westin Dallas Downtown, 1201 Main Street, Dallas, TX 75202
Phone: (972) 584-6650
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.)

Conference 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.

Cell Phones: Please turn off cell 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.