



MEADOWS COLLIER

ATTORNEYS AT LAW

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

**LIVE STREAMING** and **GROUP DISCOUNTS** Available

See inside for details

**T A X A T I O N**

**21**

**FROM TRIED-AND-TRUE TO THE EMERGING:  
Strategies for Today's Tax Planning  
and Controversy**

Conference Qualifies for 10 CPE Hours and 8.25 MCLE Hours

Fee: \$265 Per Person

The 21st Annual Meadows Collier Conference  
**Tuesday, November 5, 2019**

**Cityplace Conference Center**  
DALLAS, TEXAS

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Meadows Collier



@meadows\_collier

Tuesday, Nov. 5

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

8:00 a.m. - 8:50 a.m.

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

9:55 a.m. - 10:10 a.m.

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

11:05 a.m. - 12:00 p.m.

12:00 p.m. - 1:15 p.m.  
Lunch with Speakers

1:15 p.m. - 2:10 p.m.

2:10 p.m. - 3:05 p.m.

3:05 p.m. - 3:20 p.m.

3:20 p.m. - 4:20 p.m.

4:20 p.m. - 5:05 p.m.

5:05 p.m.

## FROM TRIED-AND-TRUE TO THE EMERGING: Strategies for Today's Tax Planning and Controversy

Registration and Continental Breakfast

### Is It Sophisticated Tax Planning or Criminal Tax Fraud?

This presentation will focus on the warning signs that distinguish legitimate planning from tax fraud. The speaker will review recent prosecutions of CPAs and other professionals in connection with tax planning that the government believed was criminal tax fraud. The review of these cases will address the facts the government relied on to argue that professionals had criminal intent.

Aaron P. Borden, J.D., CPA

### Cryptocurrency - An Overview of IRS Enforcement Efforts to Ensure Compliance

Virtual currencies are types of decentralized digital monies that are independent of central banks and government regulators. In recent months, the U.S. Government has ramped up efforts to tax and regulate the once unregulated currency. This presentation discusses the current tax and regulatory landscape of virtual currencies. It will also include emerging trends in IRS enforcement, what we know, and what unresolved issues remain.

Michael A. Villa, Jr., J.D., LL.M., Laura L. Stapleton, J.D., LL.M., CPA and Paul M. Budd, J.D., LL.M.

Break

### Structuring Ownership Interests in Foreign Investments – Latest Guidance

Recent guidance issued in response to the Tax Cuts and Jobs Act impacts the preferred arrangement through which U.S. taxpayers own their foreign businesses and investments. The arrangement that works best in a particular situation depends on the specific nature of the foreign investment. This presentation discusses recent guidance impacting these decisions and the factors relevant in determining which arrangements are preferable in different situations.

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

### IRS Estate and Gift Tax Examinations in the Age of Higher Exemptions

Transfer tax audits and litigation are not going away despite higher exemptions. This presentation will discuss current trends in the transfer tax controversy area at audit level, appeals and in litigation.

Joel N. Crouch, J.D.

### IRS on the Move: The Latest and Greatest from the Trenches

The IRS is finally in hiring mode. Onboarding new agents is not as easy as you may think. This presentation will discuss the practical implications of the IRS continuing to do more with less while devoting precious time to training new hires. Topics will include: how to handle training audits, effectively communicating issues within the IRS, utility of appeals mediation, IRS' latest enforcement strategies for offshore accounts and other current enforcement tips and trends.

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

### The Anatomy of Spousal Lifetime Access Trusts (SLATs)

Spousal Lifetime Access Trusts (SLATs) have been used successfully for many years. Although fairly common, if not done carefully special problems can arise. Given the status of the current Estate Tax laws, is there a SLAT in your client's future? The speakers will dissect these trusts to determine what makes them tick and give you the tools to diagnose whether they are a cure for your client's estate tax woes.

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

### Troubleshooting Texas Taxation of Electronic Commerce: Information Technology ("IT") Services and Electronic Products Present Challenges for Texas Taxpayers

The advent of electronic commerce has presented unique challenges for Texas taxpayers and the Texas Comptroller. Information Technology or "IT" and related services, as well as the creation and sale of electronic products, implicate questions of taxability, sourcing and nexus that must be viewed from both a sales tax and franchise tax perspective. This presentation discusses the applicable rules, policies, administrative hearings and case law pertaining to electronically based transactions and related services under Texas law from both a Texas franchise and Texas sales and use tax perspective, focusing primarily on areas proven to be most problematic for Texas taxpayers.

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

Break

### Judicial Update: Lessons from Recent Court Decisions

The United States Tax Court and other federal courts have released a number of interesting decisions that will impact taxpayers and tax professionals alike. This presentation explores recently-released tax cases and anticipated decisions expected in the near future.

Brian J. Spiegel, J.D., LL.M. and Jeffrey M. Glassman, J.D., LL.M.

### The How-To Guide to Avoiding Accountant's Liability

Recent cases demonstrate that avoiding liability to clients, third parties and the government is becoming harder to do. Some statutes of limitation never run and others only begin upon discovery of the actions complained about. There are steps which CPAs can take to limit their liability, including the use of separate engagement letters, docket reminders of due dates, and careful selection of those clients you decide to accept.

Charles M. Meadows, Jr., J.D., CPA

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 and estate planning and probate 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 former adjunct law professors.

## FROM TRIED-AND-TRUE TO THE EMERGING: Strategies for Today's Tax Planning and Controversy

## The 21st Annual Meadows Collier Conference Tuesday, November 5, 2019

### CONFERENCE MATERIALS FOR LIVE CONFERENCE:

Check your registration email confirmation for the website address and password to access the conference materials. Materials will be available beginning October 29, 2019.

### 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 <https://www.meadowscollier.com/conference> to print the registration form and mail with a check payable to Meadows Collier 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 21st 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 webcast registration or technical requirements, please contact support.  
Email: [help@bpnmedia.com](mailto:help@bpnmedia.com) • Phone: (877) 602-9877

To Register go to: <https://catalog.bpnmedia.com/item/21st-annual-meadows-collier-taxation-conference-306439>

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 CPE Credit for the Webcast contact Anne Taylor.  
[anne.taylor@acpen.com](mailto:anne.taylor@acpen.com) • (972) 377-8199

### Group Discounts

The discounts available include 10% for three (3) or more participants, 20% for six (6) or more participants, and 25% for groups of 10 or more. To receive a group discount all registrations and payment must be received together at the same time.

CONFERENCE – to register a group with a discount, complete a registration form for each registrant and mail with a check payable to Susan House, Marketing Manager, Meadows Collier, 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](mailto: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: \$265 PER PERSON Code: MC

Total Amount: \$ \_\_\_\_\_ Method of Payment:  Check

# GENERAL INFORMATION

**Program Date:** Tuesday, November 5, 2019

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

**Breaks:** 9:55 a.m. – 10:10 a.m., 3:05 p.m. – 3:20 p.m.

**Lunch:** 12 Noon – 1:15 p.m. Lunch is provided for only Live Conference participants.

**Networking Reception after Live Conference:** Attend a complimentary networking reception immediately following the conclusion of the conference.

**Fee:** \$265 Per Person for Live Conference or Webcast. Group Discounts are available - Discounts available are 10% for three (3) or more participants, 20% for six (6) or more participants, and 25% for groups of 10 or more participants.

**CPE Hours:** 10 Hours; Sponsor ID # 08150.

**NOTE:** The CPE Credit for the Live Streaming will be issued by Business Professionals Inc. (ACPEN)

**MCLE Hours:** 8.25 Hours

**Live Conference Course #:** 174062914

**Program Materials:** Materials will be available beginning October 29, 2019. Live Conference attendees – the link to the conference materials will be included in your registration confirmation email. Webcast participants – information and instructions regarding the program materials will be sent by BNP Network to those registered prior to the webcast.

**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  
Web: <https://www.warwickhotels.com/warwick-melrose-dallas>

Hotel Crescent Court, 400 Crescent Court, Dallas, TX 75201  
Phone: (214) 871-3200  
Web: <https://www.crescentcourt.com>

Dallas Marriott Downtown, 650 N. Pearl St., Dallas, TX 75201  
Phone: (214) 979-9000  
Web: <https://www.marriott.com/hotels/travel/dalddt-dallas-marriott-downtown/>

### Suggested Hotel Accommodations (continued):

W Dallas Victory, 2440 Victory Park Lane, Dallas, TX 75219  
Phone: (214) 397-4100  
Web: <https://www.marriott.com/hotels/travel/dalwh-w-dallas-victory/>

The Westin Dallas Downtown, 1201 Main Street, Dallas, TX 75202  
Phone: (972) 584-6650  
Web: <https://www.marriott.com/hotels/travel/daldw-the-westin-dallas-downtown/>

The Statler Dallas, 1914 Commerce St., Dallas, TX 75201  
Phone: (214) 459-3930  
Web: <https://curiocollection3.hilton.com/en/hotels/texas/the-statler-dallas-curio-collection-by-hilton/>

Hotel Fairmont Dallas, 1717 N. Akard St., Dallas, TX 75201,  
(214) 720-2020  
Web: <https://www.fairmont.com/dallas/>

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

**Live Conference Registration:** The registration form must be accompanied with the conference fee. If paying by check, please make checks payable to Meadows Collier 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 given 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.

DALLAS, TEXAS  
Cityplace Conference Center

Tuesday, November 5, 2019

Today's Tax Planning and Controversy

TO THE EMERGING: Strategies for  
FROM TRIED-AND-TRUE

21

TAXATION

The 21st Annual  
Meadows Collier Conference



Return Service Requested

901 Main Street, Suite 3700  
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