

**NYU**SCHOOL OF  
PROFESSIONAL STUDIES

# SUMMER INSTITUTE IN TAXATION

## THE WESTIN NEW YORK AT TIMES SQUARE

NEW YORK, NY

### INTRODUCTION TO INTERNATIONAL TAXATION

JULY 17-19, 2017

Co-Chairs: **William B. Sherman, Esq.**, *Partner,*  
*Holland & Knight, Fort Lauderdale, FL***Michael J. Miller, Esq.**, *Partner,*  
*Roberts & Holland, New York, NY*

### ADVANCED INTERNATIONAL TAXATION

JULY 20-21, 2017

Co-Chairs: **William B. Sherman, Esq.**, *Partner,*  
*Holland & Knight, Fort Lauderdale, FL***Michael J. Miller, Esq.**, *Partner,*  
*Roberts & Holland, New York, NY*

### INTRODUCTION TO STATE AND LOCAL TAXATION

JULY 17-19, 2017

Co-Chairs: **Arthur R. Rosen, Esq.**, *Partner,*  
*McDermott Will & Emery, New York, NY and Miami, FL***Leah Robinson, Esq.**, *Partner,*  
*Mayer Brown, New York, NY***Alysse McLoughlin, Esq.**, *Partner,*  
*McDermott Will & Emery, New York, NY*

### INTERMEDIATE STATE AND LOCAL TAXATION

JULY 20-21, 2017

Co-Chairs: **Arthur R. Rosen, Esq.**, *Partner,*  
*McDermott Will & Emery, New York, NY and Miami, FL***Leah Robinson, Esq.**, *Partner,*  
*Mayer Brown, New York, NY***Alysse McLoughlin, Esq.**, *Partner,*  
*McDermott Will & Emery, New York, NY*

### INTRODUCTION TO PARTNERSHIPS TAXATION

JULY 24-26, 2017

Co-Chairs: **James A. Gouwar, Esq.**, *Partner,*  
*Morgan, Lewis & Bockius, New York, NY***Michael A. Meisler, CPA, JD, LL.M.**, *Partner,*  
*EY, New York, NY*

### INTRODUCTION TO CONSOLIDATED RETURNS

JULY 26-28, 2017

Chair: **Stephen A. Sacks, CPA, JD, LL.M.**, *Executive Director,*  
*EY, New York, NY*

### INTRODUCTION TO TRUSTS AND ESTATES

JULY 24-26, 2017

Chair: **Joseph P. Scorese, Esq.**, *Partner,*  
*Harwood Lloyd, Hackensack, NJ*

### ADVANCED INCOME TAX AND WEALTH PLANNING CONFERENCE

JULY 26-28, 2017

Chair: **Jerald David August, Esq.**, *Partner,*  
*Kostelanetz & Fink, New York, NY*

FINANCE AND LAW PROGRAMS

**NYU****SCHOOL OF  
PROFESSIONAL STUDIES**

## SUMMER INSTITUTE OF TAXATION

### WHY NYU SCHOOL OF PROFESSIONAL STUDIES?

The NYU School of Professional Studies has been a leader in continuing professional education for over 80 years. The School blends the scholarly resources of NYU, one of the leading universities in the country, with the knowledge and the practical experience of the world-class professional community that surrounds it. The School's longstanding tradition of excellence in continuing legal, accounting, and taxation programs attracts the best and the brightest speakers, who impart their knowledge of the most current industry trends and regulations. As an educational institution, the NYU School of Professional Studies is committed to providing the highest quality learning experience for participants in its programs.

### WHO SHOULD ATTEND?

The intensive tax conferences are ideal for the new professional who wants a solid foundation in a specialized area of law or tax practice. Those attorneys and accountants already practicing attend to refresh their knowledge and to learn about new developments in legislation and regulations. Attend the introductory conferences and acquire critical new skills and practical knowledge you can use immediately. Attend the intermediate/advanced conferences and receive a high-level update and an in-depth analysis of the latest developments. CLE, CPE, and CE credits also are available.

### CONTINUING EDUCATION CREDIT

In addition to meeting the educational requirements of many organizations and agencies, the introductory conferences also are available for New York transitional Continuing Legal Education (CLE) credit for newly admitted attorneys. These programs continue to be open to experienced attorneys and accountants seeking to refresh their practice skills or to develop new ones. See the "General Information" section at the end of this brochure for more details.

### LEARNING OBJECTIVES/PROGRAM LEVELS/PREREQUISITES

See individual conference agendas for learning objectives, program levels, and prerequisites.

### INSTRUCTIONAL METHOD

Group-Live.

### ADVANCED PREPARATION

No advanced preparation.

### CONFERENCE LOCATION AND ACCOMMODATIONS

All of the conferences will be held at The Westin New York at Times Square, a state-of-the-art conference facility in the heart of the theater district. We have arranged a group rate of \$319. See the "General Information" section at the end of this brochure for more details.

## NYU SCHOOL OF PROFESSIONAL STUDIES

**Dennis Di Lorenzo, BA**, *Harvey J. Stedman Dean*

## DIVISION OF PROGRAMS IN BUSINESS

**Martin Ihrig, MBS, PhD**, *Associate Dean and Clinical Professor*

## DEPARTMENT OF FINANCE AND LAW PROGRAMS

**Kathleen Costello, CMP**, *Assistant Director*

*NYU School of Professional Studies reserves the right to change, with or without notice, any statement in this brochure concerning, but not limited to, rules, policies, tuition, fees, curriculum, speakers, courses, and programs.*

**THE WESTIN NEW YORK IN TIMES SQUARE**  
**NEW YORK, NY**  
JULY 17-28, 2017

**SPONSORS**

The NYU School of Professional Studies thanks the following organizations for their contribution to the success of the Summer Institute in Taxation:

**GOLD SPONSORS**



**SILVER SPONSORS**



# SUMMER INSTITUTE IN TAXATION

## INTRODUCTION TO INTERNATIONAL TAXATION

**JULY 17-19, 2017**

**Co-Chairs:** **William B. Sherman, Esq.**, *Partner, Holland & Knight, Fort Lauderdale, FL*  
**Michael J. Miller, Esq.**, *Partner, Roberts & Holland, New York, NY*

### DAY 1

**8:00 – 8:30 a.m.**

**REGISTRATION AND DISTRIBUTION OF MATERIALS**

**8:30 – 8:45 a.m.**

**INTRODUCTION AND OVERVIEW**

**William B. Sherman, Esq.**, *Partner, Holland & Knight, Fort Lauderdale, FL*  
**Michael J. Miller, Esq.**, *Partner, Roberts & Holland, New York, NY*

**8:45 – 10:15 a.m., 10:30 a.m. – Noon**

**US TAXATION OF FOREIGN PERSONS**

This session covers the rules governing source of income; US trade or business; effectively connected income; FDAP income; withholding taxes; FIRPTA; branch profits tax; branch level interest tax; earnings stripping; anti-conduit financing.

**Michael J. Miller, Esq.**, *Partner, Roberts & Holland, New York, NY*

**10:15 – 10:30 a.m.**

**REFRESHMENT BREAK**

**Noon – 1:15 p.m.**

**LUNCH RECESS**

**1:15 – 2:45 p.m.**

**PLANNING FOR AND ETHICAL ISSUES IN REPRESENTING THE FOREIGN  
INDIVIDUAL INVESTING IN OR MOVING TO THE US**

Foreign individuals who invest in or move to the US are confronted with structuring and planning to minimize US income and estate and gift taxation, as well as integrating the US rules with their home country tax rules. This session addresses the application of the US rules and the ethical responsibilities and considerations applicable to US tax advisors who assist such foreign individuals.

**Summer Ayers LePree, Esq.**, *Partner, Bilzin Sumberg Baena Price & Axelrod, Miami, FL*

**2:45 – 3:00 p.m.**

**REFRESHMENT BREAK**

**3:00 – 4:30 p.m.**

**DIRECT AND INDIRECT FOREIGN TAX CREDIT AND FOREIGN TAX CREDIT LIMITATION**

The US imposes worldwide taxation on US citizens, residents, and US business entities. This session explores how the provisions of Sections 901, 902, and 904 provide for, and limit the ability of such US taxpayers to claim, tax credits for foreign taxes that they suffer directly and indirectly.

**David G. Shapiro, Esq.**, *Partner, Saul Ewing, Philadelphia, PA*

### DAY 2

**8:45 – 10:15 a.m.**

**US TAX TREATY PRIMER—AN OVERVIEW OF US TAX TREATIES AND  
PLANNING TECHNIQUES**

US tax treaties modify the statutory tax rules affecting cross-border taxation. This session explores the typical provisions of such treaties, who is eligible to benefit under a treaty, and how a treaty modifies the tax rules that would otherwise apply.

**Lawrence A. Pollack, Esq.**, *CPA, Partner, KPMG, New York, NY*

10:15 – 10:30 a.m.  
**REFRESHMENT BREAK**

10:30 a.m. – Noon  
**BASICS OF INTERNATIONAL TAX COMPLIANCE**

Reporting and disclosure are the fundamental tools used by governments to enforce their domestic tax laws. In recent years, the laws requiring reporting and disclosure have been dramatically expanded and the penalties for failure to comply with such laws have been substantially increased. This session details the numerous US reporting and disclosure obligations applicable to international investment and transactions and the penalties for failure to comply.

**Kevin E. Packman, Esq.**, *Partner, Holland & Knight, Miami, FL*  
**Henry P. Alden II, MST, CPA, PFS**, *Partner, Everest Ito Group, Annapolis, MD*

Noon – 1:15 p.m.  
**LUNCH RECESS**

1:15 – 2:45 p.m., 3:00 – 4:30 p.m.  
**SUBPART F**

Subpart F is the principal anti-deferral regime of the Internal Revenue Code providing for taxation of US shareholders of controlled foreign corporations (CFC). This session explores the definitions of a CFC and US shareholder; the types of Subpart F income; exceptions and limitations on Subpart F income; Section 956 inclusions; and distributions of previously taxed income.

**William B. Sherman, Esq.**, *Partner, Holland & Knight, Fort Lauderdale, FL*  
**William L. Bricker, Jr., Esq.**, *Partner, Curtis, Mallet-Prevost, Colt & Mosle, New York, NY*

2:45 – 3:00 p.m.  
**REFRESHMENT BREAK**

**DAY 3**

8:30 – 10:00 a.m.  
**PASSIVE FOREIGN INVESTMENT COMPANIES**

The US taxation of US persons who are shareholders of passive foreign investment companies (PFIC) is complex and often misunderstood. This session covers the definitional provisions of the PFIC rules and the alternative methods of taxation of US shareholders of a PFIC.

**Jason S. Bazar, Esq.**, *Partner, Mayer Brown, New York, NY*

10:00 – 10:15 a.m.  
**REFRESHMENT BREAK**

10:15 a.m. – Noon  
**TRANSFER PRICING BASICS**

Cross-border transactions between related persons are subject to the transfer pricing rules of Section 482. This session addresses the general rules of Section 482 and the specific applications of those rules to certain categories of transactions, including transfers of tangible and intangible property; and services and loans. The session also explores the economic analysis relevant to transfer pricing; correlative relief; and cost-sharing agreements.

**Brian P. Trauman, Esq.**, *National Transfer Pricing Leader; Global Lead, Transfer Pricing Dispute Resolution, KPMG, New York, NY*

Noon – 1:15 p.m.  
**LUNCH RECESS**

# SUMMER INSTITUTE IN TAXATION

1:15 – 2:45 p.m.

## OUTBOUND TRANSFERS: SECTION 367 AND INVERSIONS

The rules of Sections 367 and 7874 are intended to curb the ability of US taxpayers to transfer to a foreign corporation US assets and stock in transactions that would otherwise qualify under US tax law as tax-free, and to prevent US business entities from inverting and becoming foreign owned. This session provides an overview of the mechanisms of both Sections 367 and 7874 and the consequences of failing to satisfy their requirements.

**Joseph M. Calianno, JD, LL.M., MBA, CPA**, *Tax Partner; International Technical Tax Practice Leader, BDO, Washington, DC*

2:45 – 3:00 p.m.

## REFRESHMENT BREAK

3:00 – 4:30 p.m.

## CASE STUDIES FOR OUTBOUND AND INBOUND INVESTMENT

This session incorporates the disparate rules covered in the preceding sessions into case studies dealing with both outbound and inbound investment scenarios and provides a review of the material covered during the entire program.

**William B. Sherman, Esq.**, *Partner, Holland & Knight, Fort Lauderdale, FL*

**Michael J. Miller, Esq.**, *Partner, Roberts & Holland, New York, NY*

**Alan I. Appel, Esq.**, *Professor of Law, New York Law School, New York, NY*

4:30 p.m.

## CONFERENCE CONCLUDES

## LEARNING OBJECTIVES

Upon completion of this program, you will have acquired a broad-based foundation in the federal income taxation of cross-border (both “inbound” and “outbound”) transactions and circumstances. In particular, you will gain exposure to:

- The relationship between income tax treaties and the Internal Revenue Code generally, including the standard subject-matter coverage of such treaties, and when and how treaties override Code provisions
- The basics of transfer pricing, including a comparison of US transfer pricing rules to those of other countries, and the mechanisms for addressing conflicts
- The nature and application of withholding taxes and other “toll charges” on the movement of money and property across borders
- The foreign tax credit and anti-deferral rules affecting controlled foreign corporations and passive foreign investment companies
- US compliance and reporting issues faced as a result of doing business globally

**Program Level: Basic • Prerequisite: No prerequisite**

## ADVANCED INTERNATIONAL TAXATION

JULY 20–21, 2017

**Co-Chairs: William B. Sherman, Esq.**, *Partner, Holland & Knight, Fort Lauderdale, FL*

**Michael J. Miller, Esq.**, *Partner, Roberts & Holland, New York, NY*

### DAY 1

8:00 – 8:30 a.m.

## REGISTRATION AND DISTRIBUTION OF MATERIALS

8:30 – 8:45 a.m.

## INTRODUCTION AND OVERVIEW

**William B. Sherman, Esq.**, *Partner, Holland & Knight, Fort Lauderdale, FL*

**Michael J. Miller, Esq.**, *Partner, Roberts & Holland, New York, NY*



8:45 – 11:00 a.m.

**FOREIGN PERSONS INVESTING IN US REAL ESTATE AND OTHER ASSETS:  
PARTNERSHIP AND OTHER STRUCTURES, TREATY PLANNING AND  
FINANCING STRATEGIES**

This session addresses the definition of US real property interest; tax rules applicable to foreign persons disposing of US real property interests; special rules applicable to investments through real estate investment trusts; special exceptions including for interests in publicly traded companies and domestically controlled real estate investment trusts, as well as special exemptions for qualified pension investors and foreign sovereign investors; and treaty and other withholding tax exemptions for payments of interest to foreign investors.

**Alan I. Appel, Esq.**, *Professor of Law, New York Law School, New York, NY*

**Michael Hirschfeld, Esq.**, *Managing Director, Andersen Tax, New York, NY*

**Philip R. Hirschfeld, Esq.**, *Associate, Ruchelman, New York, NY*

11:00 – 11:15 a.m.

**REFRESHMENT BREAK**

11:15 a.m. – 12:15 p.m.

**USE OF PARTNERSHIPS IN INTERNATIONAL TAX PLANNING**

This session focuses on the application of numerous international tax rules where activities are conducted, or assets are held, through partnerships. In the case of “outbound” structures, the discussion addresses the definition of CFC, various types of Subpart F income, the operation of Section 956, and special rules for transfers of appreciated property to a partnership with a related foreign partner. In the case of “inbound” structures, the discussion addresses the FIRPTA rules and a controversial ruling relating to sales of interests in a partnership engaged in a US trade or business.

**Kimberly S. Blanchard, Esq.**, *Partner, Weil, Gotshal & Manges, New York, NY*

12:15 – 1:30 p.m.

**LUNCH RECESS**

1:30 – 3:00 p.m., 3:15 – 4:30 p.m.

**INTERNATIONAL MERGERS AND ACQUISITIONS: US TAX CONSIDERATIONS  
AND PLANNING TECHNIQUES**

Among the topics covered in this session are the US tax considerations for taxable and tax-free stock acquisitions of foreign companies, CFC issues, tax-free acquisitions of US companies, planning for the use of holding companies, inversion transactions, debt-equity regulations, use of hybrid instruments, OECD BEPS issues, and recent developments.

**Sam K. Kaywood, Esq.**, *Partner, Alston & Bird, Atlanta, GA*

**William S. Dixon, Esq.**, *Managing Director, Mergers and Acquisitions, Citigroup Global Markets, New York, NY*

**William B. Sherman, Esq.**, *Partner, Holland & Knight, Fort Lauderdale, FL*

3:00 – 3:15 p.m.

**REFRESHMENT BREAK**

**DAY 2**

8:30 – 9:45 a.m.

**CURRENT ISSUES FOR FOREIGN PORTFOLIO INVESTORS**

This session provides an overview of rules governing the US taxation of portfolio investment by foreign persons; an analysis of the trading safe harbors; the current state of the dispute concerning whether foreign lending is a trade or business; the use of the US as a “tax haven” destination for the ownership of financial assets by non-US persons; and the obligations of “gatekeepers” in the new world of increasing tax transparency.

**Leonard Schneidman, Esq.**, *Managing Director, Andersen Tax, Boston, MA*

# SUMMER INSTITUTE IN TAXATION

9:45 – 11:00 a.m.

## TAX PLANNING UNDER SUBPART F

Subpart F imposes numerous rules that impose US taxation on US shareholders of CFCs. This session addresses planning opportunities and traps for the unwary, including use of the 30-day rule, rules for mid-year sales of CFCs, earnings and profits limitations, and the use of various exceptions, including the same-country exception, the look-through rule for certain other payments between related CFCs, the active rent and royalty exception, and the high-tax exception. The discussion also addresses special techniques such as “check and sell,” and rules applicable to foreign base company sales and services income.

**Lawrence A. Pollack, Esq., CPA**, *Partner, KPMG, New York, NY*

11:00 – 11:15 a.m.

## REFRESHMENT BREAK

11:15 a.m. – 12:15 p.m.

## ELIGIBILITY ISSUES UNDER US INCOME TAX TREATIES

US income tax treaties and US law impose numerous requirements on persons seeking to benefit under such treaties. Items covered in the session include issues of residence, stricter tests under the limitations on benefits article, conduit financing (beneficial ownership) regulations, hybrid entities, and other treaty restrictions, including new proposed rules for taxpayers eligible for the benefits of special tax regimes and notional interest deductions.

**Michael J. Miller, Esq.**, *Partner, Roberts & Holland, New York, NY*

12:15 – 1:30 p.m.

## LUNCH RECESS

1:30 – 3:00 p.m.

## INTERCOMPANY CONTRACT DRAFTING TECHNIQUES TO OPTIMIZE TRANSFER PRICING RESULTS

Practitioners are provided with basic principles for drafting intercompany agreements generally, basic principles for drafting intercompany transfer pricing contracts (including, in particular, identification of assets, functions, and risks), and specific drafting techniques for specific types of intercompany agreements, such as distribution agreements, service agreements, sales and licenses of intellectual property, and cost-sharing agreements.

**John P. Warner, Esq.**, *Shareholder, Buchanan Ingersoll & Rooney PC, Washington, DC*

3:00 – 3:15 p.m.

## REFRESHMENT BREAK

3:15 – 4:15 p.m.

## TAX STRUCTURING FOR CROSS-BORDER INVESTMENT FUNDS

The session includes an overview of US tax considerations for cross-border fund investing, both inbound and outbound. The recent changes in Section 385, and its impact on inbound investing techniques are reviewed. For outbound, the use of hybrid instruments, techniques for preserving capital gain and qualified dividend treatment are reviewed, as are the application of the anti-inversion rules to funds. Techniques for managing effectively connected income issues for foreign investors in the US through the use of parallel funds and alternative investment funds also are reviewed.

**Joan C. Arnold, Esq.**, *Partner, Pepper Hamilton, Philadelphia, PA*



4:15 p.m.

## CONFERENCE CONCLUDES

### LEARNING OBJECTIVES

Upon completion of this program, you will have acquired a sophisticated knowledge of “hot button” issues and opportunities in international taxation such as:

- Planning and pitfalls applicable to doing business globally, including the use of hybrid US and foreign entities and investment structures
- Planning and structuring issues involving cross-border mergers and acquisitions
- Eligibility issues under US income tax treaties
- Foreign investment in US real property and US taxpayers’ investments in foreign real estate
- Drafting intercompany agreements with an eye on transfer pricing

**Program Level:** Update • **Prerequisite:** Knowledge of international taxation

## INTRODUCTION TO STATE AND LOCAL TAXATION

JULY 17-19, 2017

**Co-Chairs:** Arthur R. Rosen, Esq., Partner, McDermott Will & Emery, New York, NY and Miami, FL

Leah Robinson, Esq., Partner, Mayer Brown, New York, NY

Alyse McLoughlin, Esq., Partner, McDermott Will & Emery, New York, NY

### DAY 1

8:00 – 8:30 a.m.

#### REGISTRATION AND DISTRIBUTION OF MATERIALS

8:30 – 10:00 a.m., 10:15 a.m. – Noon

#### JURISDICTION TO TAX: CONSTITUTIONAL AND FEDERAL CONSTRAINTS

Exploration of the circumstances under which a state may—and may not—impose tax obligations on a business.

Arthur R. Rosen, Esq., Partner, McDermott Will & Emery, New York, NY and Miami, FL

David A. Hughes, Esq., Partner, Horwood Marcus & Berk Chartered, Chicago, IL

Charles J. Moll III, Esq., Partner, Winston & Strawn, San Francisco, CA

10:00 – 10:15 a.m.

#### REFRESHMENT BREAK

Noon – 1:00 p.m.

#### LUNCH RECESS

1:00 – 2:30 p.m., 2:45 – 4:30 p.m.

#### CORPORATE INCOME AND OTHER BUSINESS ACTIVITY TAXES: PART I

Determining the tax base, including the unitary business concept.

Arthur R. Rosen, Esq., Partner, McDermott Will & Emery, New York, NY and Miami, FL

Jaye A. Calhoun, Esq., Partner, Kean Miller, New Orleans, LA

Charles J. Moll III, Esq., Partner, Winston & Strawn, San Francisco, CA

2:30 – 2:45 p.m.

#### REFRESHMENT BREAK

# SUMMER INSTITUTE IN TAXATION

## DAY 2

8:30 – 10:00 a.m., 10:15 – 11:30 a.m.

### CORPORATE INCOME AND OTHER BUSINESS ACTIVITY TAXES PART II

Allocation and apportionment; UDITPA; return filings; NOLs and credits.

**Arthur R. Rosen, Esq.**, *Partner, McDermott Will & Emery, New York, NY and Miami, FL*

**William M. Backstrom, Jr., Esq.**, *Partner, Jones Walker, New Orleans, LA*

**Steven P. Young, Esq.**, *Partner, Holland & Hart, Salt Lake City, UT*

10:00 – 10:15 a.m.

### REFRESHMENT BREAK

11:30 a.m. – 12:30 p.m.

### OTHER CONSTITUTIONAL ISSUES

Understanding the less common, but equally powerful, constitutional protections, including the Import-Export Clause, the First Amendment, Equal Protection, and the Supremacy Clause. This session also covers “other” constitutional and federal issues, such as the Tax Injunction Act.

**Hayes R. Holderness, Esq.**, *Assistant Professor, University of Richmond School of Law, Richmond, VA*

**Shirley K. Sicilian, Esq.**, *National Director of State and Local Tax Controversy, KPMG, Washington, DC*

12:30 – 1:45 p.m.

### LUNCH RECESS

1:45 – 3:15 p.m.

### PROPERTY TAX AND TRANSFER TAX BASICS

Property tax issues, including challenging an assessment. Transfer tax issues, including identifying when a transfer tax may be triggered before it is too late to plan for it.

**Glenn Newman, Esq.**, *Shareholder, Greenberg Traurig, New York, NY*

**David C. Wilkes, Esq.**, *Partner, Huff Wilkes, Tarrytown, NY*

**Edward Williams, MPI**, *Senior Managing Director, Cushman & Wakefield, New York, NY*

3:15 – 3:30 p.m.

### REFRESHMENT BREAK

3:30 – 4:30 p.m.

### PREPARING FOR PROTEST

Protecting your company’s rights when an issue is not resolved through audit.

**Amy F. Nogid, Esq.**, *Counsel, Mayer Brown, New York, NY*

**John H. Paraskevas, Esq.**, *State Tax Counsel, Exxon Mobil Corporation, Houston, TX [Invited]*

## DAY 3

8:30 – 10:00 a.m., 10:15 a.m. – 12:15 p.m.

### SALES AND USE TAXATION

Underlying principles; destination issues; services; e-commerce; audits; bulk sales; and special situations.

**Rachel C. Bradford**, *Senior Tax Staff, Western Union, Englewood, CO*

**Dennis Rimkunas, Esq.**, *Partner, Jones Day, New York, NY*

**Leah Robinson, Esq.**, *Partner, Mayer Brown, New York, NY*

10:00 – 10:15 a.m.

### REFRESHMENT BREAK

12:15 – 1:15 p.m.

### LUNCH RECESS

.....  
**1:15 – 2:15 p.m.**

### **RESERVE BASICS**

A primer on accounting for tax contingencies.

**Crystal Bottieri-August, Esq.**, *Tax Attorney, American Express Company, New York, NY* [Invited]

**Alyse McLoughlin, Esq.**, *Partner, McDermott Will & Emery, New York, NY*  
.....

**2:15 – 3:15 p.m.**

### **TAXATION OF PARTNERSHIPS**

Entity classification issues; nexus issues; apportionment issues.

**Margaret C. Wilson, Esq.**, *Founding Partner, Wilson Law Group, Somerville, NJ*

**Zal A. Kumar, Esq.**, *Director of Business Tax Services, New York City Department of Finance, Brooklyn, NY*  
.....

**3:15 – 3:30 p.m.**

### **REFRESHMENT BREAK**

.....

**3:30 – 4:30 p.m.**

### **ETHICAL CONSIDERATIONS WHEN INTERACTING WITH AUDITORS**

Discussion of many of the ethical issues that can arise during the conduct of an audit and analysis of the proper response as required by various ethical guidelines.

**Joe Huddleston, Esq., LLD**, *Executive Director, EY, Washington, DC*

**Janette M. Lohman, Esq., CPA**, *Partner, Thompson Coburn, St. Louis, MO* [Invited]

**Frank A. Yanover, Esq.**, *Former Senior Tax Counsel, General Electric Company, Fort Lauderdale, FL*  
.....

**4:30 p.m.**

### **CONFERENCE CONCLUDES**

### **LEARNING OBJECTIVES**

Upon completion of this program, you will have acquired a broad-based foundation in state and local taxation, as well as a basis for comparing and contrasting the various states' systems of taxation with each other, and with the Internal Revenue Code:

- Constitutional limitations on the ability of states to tax kinds of income and categories of taxpayers generally
- The essentials of multistate income taxation including allocation and apportionment of income with respect to taxpayers with residence or operations in more than one state
- The essentials and principles of non-income based taxes with emphasis on sales and use taxes

**Program Level: Basic • Prerequisite: No Prerequisite**

## **INTERMEDIATE STATE AND LOCAL TAXATION**

**JULY 20-21, 2017**

**Co-Chairs:** **Arthur R. Rosen, Esq.**, *Partner, McDermott Will & Emery, New York, NY and Miami, FL*

**Leah Robinson, Esq.**, *Partner, Mayer Brown, New York, NY*

**Alyse McLoughlin, Esq.**, *Partner, McDermott Will & Emery, New York, NY*

### **DAY 1**

.....

**8:00 – 8:30 a.m.**

### **REGISTRATION AND DISTRIBUTION OF MATERIALS**

.....

**8:15 – 8:30 a.m.**

### **OPENING COMMENTS**

**Arthur R. Rosen, Esq.**, *Partner, McDermott Will & Emery, New York, NY and Miami, FL*

# SUMMER INSTITUTE IN TAXATION

8:30 – 10:00 a.m., 10:15 a.m. – Noon

## SENIOR AUDIT MANAGEMENT AND GENERAL COUNSEL ROUNDTABLE

Senior audit management and general counsel from state taxing departments discuss current developments in their states.

**Moderator: Leah Robinson, Esq.,** *Partner, Mayer Brown, New York, NY*

**Joseph Carzo,** *Director, Tax Audit Division, New York State Department of Taxation and Finance, Albany, NY*

**Michael T. Fatale, Esq.,** *Deputy General Counsel, Massachusetts Department of Revenue, Boston, MA*

**Patrick J. Foray,** *Assistant Chief, Audit Activity, New Jersey Division of Taxation, Trenton, NJ*

**Joe W. Garrett, Jr., Esq.,** *Deputy Commissioner, State of Alabama Department of Revenue, Montgomery, AL*

**Suzanne Leighton, CPA,** *Deputy Secretary for Compliance and Collections, Pennsylvania Department of Revenue, Harrisburg, PA*

**Harry P. Leonard, Esq.,** *Deputy Commissioner, Tax Audit and Enforcement Division, New York City Department of Finance, Brooklyn, NY*

**Christine T. Mesirow, Esq.,** *Section Chief, Taxation, Ohio Attorney General's Office, Columbus, OH*

**Eric Peate, Esq.,** *Attorney Supervisor, Florida Department of Revenue, Tallahassee, FL*

10:00 – 10:15 a.m.

## REFRESHMENT BREAK

Noon – 1:15 p.m.

## LUNCH RECESS

1:15 – 2:15 p.m.

## FALSE CLAIMS ACT AND CLASS ACTION LAWSUITS

An understanding of False Claims Act litigation (qui tam actions), with a special focus on cases in New York and Illinois. Discussion of consumer fraud actions throughout the United States. Special considerations in defending these non-traditional tax cases.

**Karen S. Dean, Esq.,** *Senior Director, Tax Counsel, Level 3 Communications, Broomfield, CO*

**Peter L. Faber, Esq.,** *Partner, McDermott Will & Emery, New York, NY*

2:15 – 3:15 p.m., 3:30 – 4:30 p.m.

## MERGERS, ACQUISITIONS, AND DISPOSITIONS

The panel explores the state income and sales and use tax aspects of mergers, acquisitions, and other restructuring models through a detailed review of four different transactions.

**Arthur R. Rosen, Esq.,** *Partner, McDermott Will & Emery, New York, NY and Miami, FL*

**Christine Cagnina, Esq.,** *Counsel, Mayer Brown, Charlotte, NC*

**Karin M. Ecroyd, CPA,** *Director, State Tax Planning, Advance Publications, New York, NY*

3:15 – 3:30 p.m.

## REFRESHMENT BREAK

## DAY 2

8:15 – 8:30 a.m.

## OPENING COMMENTS

**Arthur R. Rosen, Esq.,** *Partner, McDermott Will & Emery, New York, NY and Miami, FL*

8:30 – 10:00 a.m., 10:10 a.m. – Noon

#### A VIEW FROM THE STATE TAX ADMINISTRATORS

State tax officials offer their views on the attitude and practices of their staffs, on how they interface with corporate tax managers and tax practitioners, and on how tax managers and tax practitioners can deal better with those in state revenue departments.

**Moderator: Alysse McLoughlin, Esq.,** *Partner, McDermott Will & Emery, New York, NY*

**John J. Ficara, Esq., CPA,** *Acting Director, New Jersey Division of Taxation, Trenton, NJ*

**Nonie Manion,** *Executive Deputy Commissioner, New York State Department of Taxation and Finance, Albany, NY*

**Gale Garriott, Esq.,** *Executive Director, Federation of Tax Administrators, Washington, DC*

**Michael Hyman,** *First Deputy Commissioner, New York City Department of Finance, Brooklyn, NY*

**Gregory S. Matson, Esq.,** *Executive Director, Multistate Tax Commission, Washington, DC*

**Mike Reissig,** *Deputy Comptroller and Chief Clerk, Texas Comptroller of Public Accounts, Austin, TX*

**Kimberly Lewis Robinson, Esq.,** *Secretary, Louisiana Department of Revenue, Baton Rouge, LA*

**Kevin B. Sullivan, Esq.,** *Commissioner, Connecticut Department of Revenue Services, Hartford, CT*

10:00 – 10:10 a.m.

#### REFRESHMENT BREAK

Noon – 1:15 p.m.

#### LUNCH RECESS

1:15 – 2:15 p.m.

#### STATE TAXATION OF INTERNATIONAL OPERATIONS

This session addresses the issues and challenges that multinational companies face in the state tax arena, including when foreign corporations can be subject to tax, and what income will be part of the tax base. The states' newer approaches to taxation of foreign income—including tax haven legislation—also are addressed.

**Alysse McLoughlin, Esq.,** *Partner, McDermott Will & Emery, New York, NY*

**Andrew W. Swain, Esq.,** *Professor of Business Law, Indiana University Judd Leighton School of Business and Economics, South Bend, IN*

2:15 – 3:15 p.m.

#### THE CONTINUING EVOLUTION OF E-COMMERCE ISSUES

The Internet and E-Commerce have had a profound effect on state taxation. This session addresses that impact and discusses the states differing approaches to the issues that are raised. Topics addressed include sales tax issues, such as nexus, taxability, and sourcing, and income tax issues, such as nexus (including PL 86-272 implications) and apportionment factor sourcing.

**Samantha Grande, CPA,** *Tax Director, Home Box Office, New York, NY*

**Charles C. Kearns, Esq.,** *Counsel, Eversheds Sutherland (US), Washington, DC*

3:15 – 3:30 p.m.

#### REFRESHMENT BREAK

3:30 – 4:30 p.m.

#### ETHICS: CONFIDENTIALITY AND PRIVILEGE ISSUES

This session discusses the complex issues that can arise in the state area concerning confidentiality and privilege, including the impact of potentially dealing with multiple states on similar issues.

**Stephanie Anne Lipinski Galland, Esq.,** *Partner, Williams Mullen, Washington, DC*

**William Townsend, Esq.,** *Of Counsel, Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, PA, Tallahassee, FL*

# SUMMER INSTITUTE IN TAXATION

4:30 p.m.

**CONFERENCE CONCLUDES**

## LEARNING OBJECTIVES

Upon completion of this program, you will have explored and will have been exposed to the full range of cutting-edge issues in state and local taxation including:

- Special insight into state revenue department initiatives and obstacles
- Planning for the state and local tax impact with respect to material business transactions
- Understanding the risks associated with businesses being sued for underpayment/undercollection of taxes (qui tam actions) and for overcollection of taxes (class actions)
- Learning the issues to be analyzed in connection with foreign (non-US) businesses and transactions

**Program Level: Intermediate • Prerequisite: Basic knowledge of state and local taxation**

## INTRODUCTION TO PARTNERSHIPS TAXATION

**JULY 24-26, 2017**

**Co-Chairs:** **James A. Gouwar, Esq.**, *Partner, Morgan, Lewis & Bockius, New York, NY*

**Michael A. Meisler, CPA, JD, LLM**, *Partner, EY, New York, NY*

### DAY 1

8:00 – 8:30 a.m.

#### REGISTRATION AND DISTRIBUTION OF MATERIALS

8:30 – 10:00 a.m., 10:15 a.m. – Noon

#### INTRODUCTION, CHOICE OF ENTITY AND FORMATION

Introduction; choice of entity considerations; entity classification and restrictions on partnership status. Formation of a partnership nonrecognition, beginning book and tax capital account and beginning basis; taxable year; methods of accounting.

**Charles R. Bogle, Esq.**, *Partner, Morgan, Lewis & Bockius, New York, NY*

**Alan Kravitz, Esq.**, *Associate, Clifford Chance, New York, NY*

10:00 – 10:15 a.m.

#### REFRESHMENT BREAK

Noon – 1:00 p.m.

#### LUNCH RECESS

1:00 – 2:30 p.m., 2:45 – 4:30 p.m.

#### PARTNERSHIP OPERATIONS

Effect of partnership operations on tax and book capital accounts and basis; special allocations.

**Morgan Holtman, Esq.**, *Director, KPMG, Washington, DC*

**John J. Rooney, Esq.**, *Director, KPMG, Washington, DC*

2:30 – 2:45 p.m.

#### REFRESHMENT BREAK

### DAY 2

8:30 – 10:00 a.m., 10:15 a.m. – Noon

#### NONRECOURSE ALLOCATIONS

Allocations of nonrecourse debt and nonrecourse deductions.

**Richard G. Blumenreich, JD, LLM**, *Principal, KPMG, Washington, DC*

**Andrew Lau, CPA, MST**, *Senior Manager, KPMG, Washington, DC*

10:00 – 10:15 a.m.  
**REFRESHMENT BREAK**

Noon – 1:00 p.m.  
**LUNCH RECESS**

1:00 – 1:45 p.m.  
**PARTNERSHIP DISTRIBUTIONS**

Current and liquidating distributions; disproportionate distributions.  
**Richard G. Blumenreich, JD, LL.M.**, *Principal, KPMG, Washington, DC*  
**Andrew Lau, CPA, MST**, *Senior Manager, KPMG, Washington, DC*

1:45 – 2:45 p.m., 3:00 – 3:45 p.m.  
**TRANSFERS OF PARTNERSHIP INTERESTS**

Sales and purchases of partnership interests.  
**Sebastian J. Grasso, Esq.**, *Senior Vice President & Director of Tax, Hedge Fund Solutions, The Blackstone Group, New York, NY*  
**John J. Rooney, Esq.**, *Director, KPMG, Washington, DC*

2:45 – 3:00 p.m.  
**REFRESHMENT BREAK**

3:45 – 4:30 p.m.  
**RETIREMENT AND DEATH OF A PARTNER**

Consequences under subchapter K, including effect on timing and character of income.  
**Sebastian J. Grasso, Esq.**, *Senior Vice President & Director of Tax, Hedge Fund Solutions, The Blackstone Group, New York, NY*  
**John J. Rooney, Esq.**, *Director, KPMG, Washington, DC*

**DAY 3**

8:30 – 10:00 a.m., 10:15 a.m. – Noon  
**PARTNER-PARTNERSHIP TRANSACTIONS**

Disguised sales and other partner-partnership transactions.  
**Brian J. O'Connor, Esq.**, *Partner, Venable, Washington, DC*  
**Steven R. Schneider, Esq.**, *Partner, Baker & McKenzie, Washington, DC*

10:00 – 10:15 a.m.  
**REFRESHMENT BREAK**

Noon – 1:00 p.m.  
**LUNCH RECESS**

1:00 – 2:30 p.m.  
**HOT TOPICS**

An overview of recent developments in the law and in the uses of partnerships.  
**James A. Gouwar, Esq.**, *Partner, Morgan, Lewis & Bockius, New York, NY*  
**Michael A. Meisler, CPA, JD, LL.M.**, *Partner, EY, New York, NY*

2:30 – 2:45 p.m.  
**REFRESHMENT BREAK**

2:45 – 3:30 p.m.  
**THE TROUBLED PARTNERSHIP**

Workouts; foreclosure; deed in lieu; abandonment of partnership interest.  
**Michael A. Meisler, CPA, JD, LL.M.**, *Partner, EY, New York, NY*



# SUMMER INSTITUTE IN TAXATION

3:30 – 4:30 p.m.

## SUMMING UP

Work through a partnership tax return and a sample partnership agreement with emphasis on the tax-sensitive provisions, such as capital account maintenance, book-ups, choice of allocation methods under Section 704(c), allocation and distribution provisions, and liquidation provisions.

**Michael A. Meisler, CPA, JD, LLM**, *Partner, EY, New York, NY*

4:30 p.m.

## CONFERENCE CONCLUDES

### LEARNING OBJECTIVES

Upon completion of this program, you will have acquired a solid foundation from which to address the intricacies of Subchapter K of the Internal Revenue Code:

- The nature of partnerships and the various legal entities taxed as partnerships
- The relationships between a partnership and its partners, as well as between and among partners themselves
- Approaches to formation including contributions of property and services in exchange for partnership interests, and the classification of those interests
- Partnership operations and reporting with particular emphasis on the basics of distributions to partners and allocation of income and deductions
- Winding down and winding up partnerships, including the withdrawal of individual partners and the transfer of partnership interests

**Program Level:** Basic • **Prerequisite:** No Prerequisite

## INTRODUCTION TO CONSOLIDATED RETURNS

JULY 26–28, 2017

**Chair:** **Stephen A. Sacks, CPA, JD, LLM**, *Executive Director, EY, New York, NY*

Although this is an introductory conference, certain topics may be complex and the instructors will review the basic tax law prior to discussing the consolidated return effects. Nevertheless, some knowledge of corporate taxation is assumed.

### DAY 1

8:00 – 8:30 a.m.

## REGISTRATION AND DISTRIBUTION OF MATERIALS

8:30 – 10:00 a.m., 10:15 a.m. – Noon, 1:00 – 2:15 p.m., 2:30 – 4:30 p.m.

Reasons for filing consolidated returns and the impact of filing them; definition of affiliated group; reverse acquisitions; determination of taxable years; due dates; accounting methods; the tax treatment of intercompany transactions.

**Stephen A. Sacks, CPA, JD, LLM**, *Executive Director, EY, New York, NY*

**Andrew M. Herman, JD, LLM**, *Senior Manager, EY, Washington, DC*

10:00 – 10:15 a.m.

## REFRESHMENT BREAK

Noon – 1:00 p.m.

## LUNCH RECESS

2:15 – 2:30 p.m.

## REFRESHMENT BREAK

## DAY 2

8:30 – 10:00 a.m., 10:15 a.m. – Noon, 1:00 – 2:15 p.m., 2:30 – 4:30 p.m.

Special limitations on certain deductions and losses; Separate Return Limitation Year (“SRLY”) rules and built-in loss rules; regulations addressing Section 382 in a consolidated context; “Overlap Rule”; at risk and passive activity rules; dual consolidated losses; NOL and capital loss carrybacks and carryforwards; loss absorption rules; effect of debt cancellation income on NOLs; other special rules relating to the computation of consolidated taxable income; consolidated tax liability including AMT, before credits; consolidated tax credits; allocation of consolidated tax liability.

**Kurt J. Roderich, CPA, MST**, *Partner, EY, New York, NY*

**Richard W. Stern, JD, MLT**, *Executive Director, EY, New York, NY*

10:00 – 10:15 a.m.

**REFRESHMENT BREAK**

Noon – 1:00 p.m.

**LUNCH RECESS**

2:15 – 2:30 p.m.

**REFRESHMENT BREAK**

## DAY 3

8:30 – 10:00 a.m., 10:15 a.m. – Noon, 1:00 – 2:15 p.m., 2:30 – 4:30 p.m.

Stock basis; excess loss accounts; determination of gain or loss on disposition of subsidiary stock; loss disallowance (unified loss rules); earnings and profits; application of Section 108 to a consolidated group; rules regarding intragroup distributions, including special rules relating to stock of members and debt obligations of members.

**Robert Liquerman, JD, LLM**, *Principal, KPMG, Washington, DC*

**Jeffrey L. Vogel, JD, LLM**, *Principal, KPMG, Washington, DC*

10:00 – 10:15 a.m.

**REFRESHMENT BREAK**

Noon – 1:00 p.m.

**LUNCH RECESS**

2:15 – 2:30 p.m.

**REFRESHMENT BREAK**

4:30 p.m.

**CONFERENCE CONCLUDES**

### LEARNING OBJECTIVES

Upon completion of this program, you will learn the fundamentals of the special rules governing the federal income taxation of consolidated groups:

- The eligibility requirements to file a consolidated federal income tax return, including the definitional provisions and the parameters for determining when an affiliated group is eligible to file a consolidated return and which corporations are eligible for inclusion
- The basics of calculating consolidated taxable income with emphasis on net operating losses and other tax attributes, the treatment of carryover and carryback items to separate return years, and the limits placed on such attributes
- The effects of consolidation within the group and among group members including basis, deferral of gains and losses, earnings and profits, and distributions

**Program Level: Basic • Prerequisite: Basic knowledge of corporate taxation**

# SUMMER INSTITUTE IN TAXATION

## INTRODUCTION TO TRUSTS AND ESTATES

**JULY 24–26, 2017**

**Chair:** Joseph P. Scorese, Esq., *Partner, Harwood Lloyd, Hackensack, NJ*

### DAY 1

8:00 – 8:30 a.m.

#### REGISTRATION AND DISTRIBUTION OF MATERIALS

8:30 – 9:00 a.m.

#### INTRODUCTION AND OVERVIEW

Joseph P. Scorese, Esq., *Partner, Harwood Lloyd, Hackensack, NJ*

9:00 – 10:00 a.m.

#### ESTATE TAXES I: THE NATURE OF THE TAX AND UNDERSTANDING THE GROSS ESTATE

This presentation introduces the basic infrastructure of the Federal estate tax, the wealth tax that drives all trust and estate planning. Covered are essential elements of the computation of the tax: the rates and credits, and the impact of the most recent statutes which affect wealth taxation, including relevant current tax law and policy discussions. Specific attention is given to the foundations of what is included in the gross estate, including powers of appointment, life insurance, and transfers with retained interests.

Mitchell Drossman, Esq., *Managing Director, National Director of Wealth Planning Strategies, US Trust, Bank of America Private Wealth Management, New York, NY*

10:00 – 10:15 a.m.

#### REFRESHMENT BREAK

10:15 – 11:30 a.m.

#### ESTATE TAXES II: THE MARITAL DEDUCTION, CREDIT SHELTER PLANNING AND PORTABILITY

Estate planning for spouses requires an understanding and appreciation of the unlimited marital deduction and how it is used effectively. Also explored are planning with the “applicable exemption amount,” the credit shelter (or “bypass”) trust and portability of the applicable exemption amount under the Tax Relief Act of 2010, the American Taxpayer Relief Act of 2012, and the Federal Regulations.

Alexis S. Gettier, Esq., *Counsel, Day Pitney, Stamford, CT*

11:30 a.m. – 12:30 p.m.

#### ESTATE TAXES III: OTHER IMPORTANT DEDUCTIONS AND ELEMENTS OF PLANNING WITH THE CHARITABLE DEDUCTION

The presentation highlights components that govern deductions which can reduce or eliminate the estate tax, such as deductibility of debts, expenses of administration, and taxes. Also introduced are the estate tax charitable deduction and its importance as a planning tool for charitable remainder trusts (CRATs and CRUTs) and charitable lead trusts (CLATs and CLUTs).

Grant Gardner, Esq., *Principal, Senior Estate Administrator and Fiduciary Counsel, Bessemer Trust Company, NA, New York, NY*

12:30 – 1:45 p.m.

#### LUNCH RECESS

1:45 – 3:00 p.m.

#### TRANSFER TAX VALUATION ISSUES AND THEIR IMPACT ON FAMILY WEALTH PLANNING OPTIONS

What is “fair market value,” as applied to the world of Federal estate and gift tax? The presentation discusses this very fundamental and critical aspect of estate planning and estate administration, and how its perception has changed over the years. Emphasis is placed upon valuation in the context of closely-held business interests and family limited partnerships.

John M. Olivieri, Esq., *Partner, White & Case, New York, NY*

3:00 – 3:15 p.m.

**REFRESHMENT BREAK**

3:15 – 4:30 p.m.

**LIFETIME TRANSFERS AND THE FEDERAL GIFT TAX: THE ENDURING WEALTH TAX**

The tax on a client's lifetime gifts is an important complement to the estate tax and essential knowledge for anyone advising on estate and trust matters. But what is a gift? This presentation explores the nature of gifts through the eyes of the Internal Revenue Code. Essential concepts are covered such as the elements of a completed gift, allowable deductions, the annual exclusion, and other exclusions. Also covered in this presentation are the fundamental planning usages of disclaimers and Crummey trusts. In addition, the presentation covers foundational concepts such as gift splitting, calculation of tax, filing gift tax returns and procedures, and the impact of the relevant recent tax laws and projected tax policy.

**Catherine G. Schmidt, Esq.,** *Partner, Schulte Roth & Zabel, New York, NY*

**DAY 2**

8:30 – 8:45 a.m.

**"RE-GROUP AND Q&A"**

**Joseph P. Scorese, Esq.,** *Partner, Harwood Lloyd, Hackensack, NJ*

8:45 – 9:45 a.m.

**THE BASICS OF BASIS IN ESTATE PLANNING**

Ever since the American Taxpayer Relief Act and the Affordable Care Act, estate planning for high net-worth individuals has undergone a fundamental shift in focus. Practitioners can no longer rely simply on recommending venerable solutions such as credit shelter trusts and dynasty trusts to solve wealth tax problems. The current tax environment demands that advisors master the income-tax effects of capital gains and capital losses on estate and trust property and inherited wealth. Clients are making strategic investment decisions on income taxation, and too often costly mistakes occur and opportunities are missed when basis issues are ignored. What is basis? How does it change? When does a step-up occur? When does a step-down occur? How is basis reflected (and how does it change) in family limited partnerships? These and other fundamental concepts are explored, as well as a conversation about the role basis may play in any "death tax" reform.

**Michael S. Schwartz, Esq.,** *Partner, Curtis, Mallet-Prevost, Colt & Mosle, New York, NY*

9:45 – 10:45 a.m.

**ESTATE PLANNING THROUGH AN ASSET PROTECTION LENS**

With portability permanent and a \$5,490,000 exclusion, clients have begun to question the necessity of "estate planning." Fortunately, all signs indicate that the litigation explosion continues unabated, and that clients are demanding "asset protection planning" solutions from their estate planning advisors. This program discusses ways in which advisors can help clients integrate their estate and asset protection planning including the use of third party and self-settled trusts.

**Gideon Rothschild, Esq., CPA,** *Partner, Moses & Singer, New York, NY*

10:45 – 11:00 a.m.

**REFRESHMENT BREAK**

11:00 a.m. – 12:15 p.m.

**TRUST, ESTATE AND ELDER CARE PLANNING FOR CLIENTS OF MODEST WEALTH**

With the passage of tax reform in 2012, and the continuing call for the reform and repeal of the "death tax," practitioners need to diversify their practices to provide more comprehensive personal services to clients for whom sophisticated Federal estate tax planning is no longer paramount. This presentation explores the aspects of estate and tax planning for individuals whose net worth is less than \$5,490,000. Focus is on planning concepts for preserving wealth to be enjoyed by the clients into their old age, including elder care concepts and asset preservation, social security planning, lifetime gifts outright and in trust, durable powers of attorney, and advance directives for healthcare. Income taxation consequences to individuals, beneficiaries, and estates arising from planning techniques are discussed as well.

**Bernard A. Krooks, Esq., CPA, AEP, CELA,** *Founding Partner, Littman Krooks, New York, NY*

12:15 – 1:30 p.m.

**LUNCH RECESS**

# SUMMER INSTITUTE IN TAXATION

1:30 – 2:30 p.m.

## STATE DEATH TAXES: WHO SAID YOUR ESTATE WAS NON-TAXABLE?

Thanks to recent tax law and the continuing beat of the drum of Federal “death tax” reform, the Federal estate tax is not the looming threat to millions of “wealthy” Americans it used to be. However, state estate taxes continue to be a factor and, in some states, inheritance taxes often are overlooked, resulting in unhappy surprises for their heirs. This presentation provides an overview of these taxes and highlights planning ideas, including using the concept of “de-coupling,” state-only QTIP elections, New York’s “cliff tax” and other considerations for avoiding or deferring state estate taxes.

**Laura A. Kelly, Esq.,** *Partner, McCarter & English, Newark, NJ*

2:30 – 3:30 p.m.

## DIGITAL ASSETS

Rapid changes in technology are challenging an estate planner’s ability to keep pace with them. This presentation discusses recent legislation in the area, and explores techniques for dealing with and administering “digital assets.”

**Jill Choate Beier, Esq.,** *Founding Partner, Beier & Associates, Lake Placid, NY*

3:30 – 3:45 p.m.

## REFRESHMENT BREAK

3:45 – 4:30 p.m.

## INTRODUCTION TO INCOME TAXATION OF TRUSTS AND ESTATES

This session explores the fundamentals of Federal income taxation for estates and trusts. What are the essential components of the IRS Form 1041? How is fiduciary income tax computed? Other essentials covered include “simple” vs. “complex” trusts; treatment of capital gains and losses; distributable net income (DNI); income tax charitable deduction rules; other itemized deductions and limitations.

**Alison Kelly Hutchinson, Esq.,** *Senior Vice President, Brown Brothers Harriman & Co., New York, NY*

**Mark Taccetta,** *Vice President and Fiduciary Income Tax Manager, Brown Brothers Harriman & Co., New York, NY*

## DAY 3

8:45 – 9:00 a.m.

## “RE-GROUP, REVIEW AND Q&A”

**Joseph P. Scorese, Esq.,** *Partner, Harwood Lloyd, Hackensack, NJ*

9:00 – 10:15 a.m.

## MULTI-GENERATIONAL PLANNING AND THE GENERATION-SKIPPING TRANSFER TAX

The third of the three wealth taxes, the GST tax is largely a “planning tax” which affects high net-worth individuals, and advisors and practitioners who ignore it, do so at their peril. Basic concepts and mechanics of the tax are explored (i.e., the characterization of a generation skip, the allocation of GST exemption, inclusion ratio and the applicable rate), as well how these mechanics affect estate planning for high net-worth individuals in vehicles such as perpetual dynasty trusts and insurance trusts.

**Joseph P. Scorese, Esq.,** *Partner, Harwood Lloyd, Hackensack, NJ*

10:15 – 10:30 a.m.

## REFRESHMENT BREAK

10:30 a.m. – Noon

## POST-MORTEM ESTATE PLANNING

A decedent’s estate in administration presents the executor and his or her advisors with a multitude of tax options and elections, many of which are overlooked and cost families needless taxes. Estate and income tax elections are explored in general. Specific attention is given to fiscal year election and IRC §645 election, uses of alternate valuation, the benefits of filing for extensions and deferrals of payment of estate tax, and the benefits and costs of using a deduction for income vs. estate tax purposes.

**Kevin Duncan, Esq.,** *Managing Director, Trust Counsel, Fiduciary Trust Company International, New York, NY*

**Theresa Kraker McGinley, Esq.,** *Managing Director, Trust Counsel, Fiduciary Trust Company International, New York, NY*

Noon – 1:15 p.m.  
**LUNCH RECESS**

1:15 – 2:45 p.m.

### **PLANNING TECHNIQUES USING GRANTOR TRUSTS**

Grantor trusts enjoy a special role in sophisticated estate planning for high net-worth individuals. This presentation explores the appeal of the grantor trust, what makes an irrevocable trust a grantor trust, and how it is deployed. A comparison of the two most popular techniques, the Grantor Retained Annuity Trust (or GRAT) and the sale to an intentionally-defective grantor trust (or IDGT) are explored and explained.

**Loretta A. Ippolito, Esq.,** *Partner, Paul, Weiss, Rifkind, Wharton & Garrison, New York, NY*

2:45 – 3:00 p.m.

### **REFRESHMENT BREAK**

3:00 – 4:30 p.m.

### **ESTATE AND TAX PLANNING FOR QUALIFIED PLAN AND IRA DISTRIBUTIONS**

An essential primer for any estate planning professional who seeks to advise a client competently on issues surrounding retirement plans (i.e., 401(k) plans, IRAs, Roth IRAs, etc.). No other asset class receives more inconsistent and often incorrect planning advice from professionals. What is a “stretch-out” IRA? Can a trust be a designated beneficiary of a retirement plan? What is a rollover and when does it occur? How can you clean up someone else’s mistakes?

**Brad J. Richter, Esq.,** *Partner, Fried, Frank, Harris, Shriver & Jacobson, New York, NY*

4:30 p.m.

### **CONFERENCE CONCLUDES**

### **LEARNING OBJECTIVES**

Upon completion of this program, you will have acquired an understanding of the varieties of taxes and tax issues applicable to gratuitous transfers by individuals and trusts and estates:

- The fundamentals of the estate tax, gift tax, and generation-skipping transfer tax are explored, including inclusions and exclusions, common valuation issues, and typical resolutions
- Fundamentals of estate and trust planning for individuals and families of modest to ultra-high net-worth
- The ancillary impact of the estate tax rules including basis rules applicable to assets distributed from the estate to beneficiaries
- The basics and differences in planning before and after death, with emphasis on the relationship of the gift tax to the estate tax and planning opportunities involving spouses and family members
- Income tax planning in estates, trusts, and beneficiaries

**Program Level: Basic • Prerequisite: No Prerequisite**

## **ADVANCED INCOME TAX AND WEALTH PLANNING CONFERENCE**

**JULY 26-28, 2017**

**Chair:** **Jerald David August, Esq.,** *Partner, Kostelanetz & Fink, New York, NY*

### **DAY 1**

8:00 – 8:30 a.m.

### **REGISTRATION AND DISTRIBUTION OF MATERIALS**

8:30 – 10:15 a.m.

### **US TAXPAYERS, INCLUDING TRUST AND ESTATES REPORTING FOR FOREIGN ASSETS AND ACTIVITIES**

A discussion of the international tax reporting requirements relevant to US persons engaged in cross-border transactions. Foreign information returns to be discussed include Forms 926, 5471, 5472, 8858, 8865, 8621, 8938, and FinCEN Form 114 (FBAR).

**Mark C. Peltz, Esq.,** *Principal, Mazars USA, New York, NY*

**Eduardo S. Chung, Esq.,** *Senior Manager, Mazars USA, New York, NY*

# SUMMER INSTITUTE IN TAXATION

10:30 a.m. – Noon

## THE UNIFORM VOIDABLE TRANSACTIONS ACT: GOOD FOR THE CREDITORS' BAR, BUT BAD FOR THE ESTATE PLANNING BAR?

Adopted by the National Conference of Commissioners on Uniform State Laws at its annual conference in Seattle, Washington during July 2014, the Uniform Voidable Transactions Act (the "UVTA") invites states to replace the better known Uniform Fraudulent Transfer Act.

**George D. Karibjanian, Esq.**, *Partner, Franklin Karibjanian & Law, PLLC, Washington, DC & Boca Raton, FL*

Noon – 1:15 p.m.

## LUNCH RECESS

1:15 – 3:05 p.m.

## UPDATE ON USE OF FAMILY LIMITED PARTNERSHIPS IN ESTATE PLANNING

An annual favorite topic of the Wealth Conference, Professor Maxfield and Mr. August again discuss recent case developments involving transfer tax and related tax issues on the use and efficacy of family limited partnerships.

**Jerald David August, Esq.**, *Partner, Kostelanetz & Fink, New York, NY*

**Guy B. Maxfield, Esq.**, *Professor Emeritus, NYU School of Law, Graduate Program in Taxation, New York, NY*

3:05 – 3:15 p.m.

## REFRESHMENT BREAK

3:15 – 4:30 p.m.

## STRUCTURING REAL ESTATE PARTNERSHIP/LLC DIVORCES

This presentation provides a practical guide to formulating effective structures for accomplishing a real estate partnership/LLC "divorce" with a minimum of adverse tax consequences. Topics covered will include: strategies for accomplishing a real estate partnership/LLC divorce; techniques for dissolving an entity and separating assets - dissolve & exchange, outright sales, "Russian Roulette," redemptions, cross-purchases, like-kind exchanges and more; practical guidance on modifying existing partnership and operating agreements to accomplish a divorce; and major tax issues to consider when formulating a real estate partnership/LLC divorce.

**Norman Lencz, Esq.**, *Partner, Venable, Baltimore, MD*

## DAY 2

8:30 – 9:40 a.m.

## PLANNING ISSUES AND PROBLEMS WITH RESPECT TO DECANTING TRUSTS

Decanting is a powerful tool that can be used to modify an irrevocable trust to address changes in laws applicable to the trust, changes in family circumstances or a need to change trust administrative provisions, such as trustee appointment and succession. This session addresses reasons to decant a trust, state decanting laws, and tax issues associated with decanting a trust.

**Wendy Herbert, Esq.**, *Partner, Fox Rothschild, Princeton, NJ*

9:40 – 9:50 a.m.

## REFRESHMENT BREAK

9:50 – 11:00 a.m.

## POST-MORTEM INCOME TAX PLANNING FOR CLOSELY-HELD COMPANIES

The presentation focuses on the income tax issues that arise from a decedent owning an interest in a partnership or S corporation at death. The topics addressed include elections to mitigate income tax, funding of bequests, utilization of losses accrued prior to death, post-death sales of company interests and application of the net investment income tax.

**Hugh C. Seligman, Esq.**, *Associate, Jones Walker, New Orleans, LA*

11:00 a.m. – 12:10 p.m.

## USE OF DEFECTIVE ENTITIES AND TAX NOTHINGS—ANOTHER LOOK AT THE CHECK-THE-BOX REGULATIONS

The speaker explores entity classification under the check-the-box regulations, including recent developments, flexibility and planning opportunities created by the regulations, traps that exist for the unwary and practical tax practitioner guidance.

**Larry J. Brant, Esq.**, *Shareholder, Garvey Schubert Barer, Portland, OR*



12:10 – 1:30 p.m.  
LUNCH RECESS

1:30 – 2:45 p.m.

**PRACTICAL, FINANCIAL, AND INCOME TAX CONCERNS FOR BUSINESS  
SUCCESSION PLANNING**

An analysis of the obstacles and available alternative solutions in passing ownership of a family business on to the next generation when the senior family member desires to treat all of the children equally, but some of the children will not take an active role in running the family business or key employees will be needed to assist in management. How the financial solutions are structured for income tax purposes.

**Jerome M. Hesck, Esq.**, *Adjunct Professor of Law, University of Miami School of Law, Miami, FL*

2:45 – 3:00 p.m.

**REFRESHMENT BREAK**

3:00 – 4:30 p.m.

**MERGERS AND ACQUISITIONS OF CLOSELY-HELD BUSINESSES**

Estate planning for the closely-held business owner often focuses on the “exit strategy,” which may be accelerated by the untimely death or incapacity of the patriarch or matriarch of the business, especially when no succession plan is in place.

**C. Wells Hall, III, Esq.**, *Partner, Nelson Mullins Riley & Scarborough, Charlotte, NC*

**DAY 3**

8:30 – 10:00 a.m.

**DEDUCTIONS INVOLVING MARITAL TRUSTS FOR A NON-CITIZEN SPOUSE:  
THE QUALIFIED DOMESTIC TRUST (QDOT)**

This session explores the rules and planning “do’s” and “don’ts” in drafting and implementing QDOT Trusts.

**Douglas L. Siegler, Esq.**, *Partner Venable, Washington, DC*

10:00 – 10:15 a.m.

**REFRESHMENT BREAK**

10:15 a.m. – Noon

**THE NEW BASIS CONSISTENCY AND BASIS REPORTING RULES**

Fiduciaries and tax advisors must pay careful attention to complying with these complex new reporting rules enacted in 2015.

**Richard H. Greenberg, Esq., CPA**, *Member, Greenberg & Schulman, Attorneys at Law, Woodbridge, NJ*

Noon – 1:15 p.m.

**LUNCH RECESS**

1:15 – 2:45 p.m.

**CHOICE OF ENTITY IN LIGHT OF TAX REFORM**

Lawyers and accountants are frequently advising clients on the pros and cons of using a particular entity under state, including foreign law, for business and investment operations. This ranges from the use of a C or S corporation to a pass thru entity such as a partnership or limited liability company. For cross-border activities, the list can expand to include reverse and hybrid entities. Each model has its own tax and transfer tax profile. The speakers discuss this “menu of choices” and weave into the discussion pending tax reform proposals.

**Jerald David August, Esq.**, *Partner, Kostelanetz & Fink, New York, NY*

**Stephen R. Looney, Esq.**, *Shareholder, Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, PA, Orlando, FL*

2:45 – 3:00 p.m.

**REFRESHMENT BREAK**

# SUMMER INSTITUTE IN TAXATION

3:00 – 4:30 p.m.

## ESTATE PLANNING FOR INVESTMENT REAL ESTATE

Investment real estate as an asset class requires special consideration in estate planning. Maximizing the basis step-up and addressing liquidity concerns pose unique challenges in planning for these assets. This program addresses these considerations and explains why conventional estate planning techniques may not be appropriate. It also provides practical solutions.

**Stephen M. Breitstone, Esq.**, *Partner, Meltzer, Lippe, Goldstein & Breitstone, Mineola, NY and New York, NY*

4:30 p.m.

## CONFERENCE CONCLUDES

### LEARNING OBJECTIVES

Upon completion of this program, you will have moved beyond the basics of the taxation of trusts and estates to more sophisticated planning opportunities and pitfalls, such as:

- Estate planning for investment real estate
- Choice of entity factors for owners of closely-held businesses
- Post-mortem planning opportunities and obstacles
- Tax planning in light of new and recent tax developments
- Review of US international tax and reporting obligations
- Advanced strategies and techniques of the estate tax, gift tax, and generation-skipping transfer tax are explored

**Program Level:** Update • **Prerequisite:** Knowledge of the taxation of trusts and estates

## GENERAL INFORMATION

### CONFERENCE FEE

See the registration form for individual conference fees. Each conference fee includes sessions, continental breakfast, refreshment breaks, and one set of course materials on a USB flash drive for each participant. You may register online, by mail, or on-site at the conference. We can only accept credit card payments through the online payment portal. We do not accept faxed registrations or wire transfers as a form of payment. To register by mail, complete the registration form and return it with a check or money order. All registrations sent by mail must be received by 12 p.m. on Thursday, July 13, 2017 (Eastern Standard Time). Full and partial waivers of the conference fee based upon financial need are available as well. To request an application, please call **212-992-3320** or email your request to [sps.tax@nyu.edu](mailto:sps.tax@nyu.edu). To register on-site, you may pay with check, money order or credit card. To pay by credit card, all walk-ins will be required to self-register at available kiosks. For faster service, conference attendees should plan to register in advance, online at [sps.nyu.edu/sumtax](https://sps.nyu.edu/sumtax).

### ELECTRONIC REGISTRATION CONFIRMATION

An automated email confirmation will be sent to the email address provided to the NYU School of Professional Studies at the time of registration. Please use an individual email address for each registrant. If a confirmation is not received within two days of online registration submission (allow one-two weeks for registrations sent by mail), please email [sps.tax@nyu.edu](mailto:sps.tax@nyu.edu) to request a duplicate copy.

### CANCELLATION AND SUBSTITUTION POLICY

A written request for cancellation must be emailed to [sps.tax@nyu.edu](mailto:sps.tax@nyu.edu) to the attention of: Conference Administration. Requests received by June 30 will receive a 100% tuition refund less a \$195 cancellation fee per conference. Due to financial obligations incurred by the NYU School of Professional Studies, there are **no refunds available after June 30**. We are not able to arrange cancellation exceptions or to accept on-site cancellations. If you cannot attend but would like to send someone in your place, please email [sps.tax@nyu.edu](mailto:sps.tax@nyu.edu) no later than July 13.

## CONFERENCE LOCATION AND HOTEL ACCOMMODATIONS

All of the conferences in the Summer Institute in Taxation are held at The Westin New York at Times Square, 270 West 43rd Street on the corner of Eighth Avenue. Hotel accommodations also are available at The Westin New York, which is easily accessible to Times Square, Broadway theaters, Radio City Music Hall, Carnegie Hall, Rockefeller Center, Central Park, and Fifth Avenue shopping. To provide a quality conference at the best possible cost the NYU School of Professional Studies has negotiated special room rates and has committed to a block of rooms at the Westin New York. We ask you to support the NYU School of Professional Studies by reserving your sleeping accommodations within the room block. Your support allows us to keep our registration fees reasonable. Single- or double occupancy rooms are available at the NYU School of Professional Studies group rate of \$319 by calling **888-627-7149** or **212-201-2700** and referring to the NYU Summer tax conference. Book your reservation in advance. Hotel rooms can sell out prior to the cut-off date. These rooms will be held as a block, unless exhausted, until June 23, at which time they will be released to the general public.

## CONFERENCE MATERIALS

A set of course materials is provided to each registrant for each conference they are registered. Included in the conference fee, registrants will receive a USB flash drive at the time of check-in containing the course materials. In addition, registrants will receive an email from the NYU School of Professional Studies approximately two-three days prior to the conference start date containing a link and special password in order to access and to download and/or print the course materials. Free WiFi also will be available for attendees at the Institute. **Bound hardcopies of the course materials will be available only upon advance request at an additional fee of \$195 per conference.** If you wish to have a printed set of materials available at the NYU School of Professional Studies Registration Desk, please indicate this when registering and submit the additional fee of \$195 per conference. Printers will not be available at the conference. Please note that materials not provided to the NYU School of Professional Studies in advance may be available in hard copy onsite and/or may be emailed to registrants after the conference upon request. However, last minute materials will not be on the USB flash drive. If you are unable to attend the conferences but would like to receive a copy of the course materials (on a USB flash drive), please send your request to: NYU School of Professional Studies, Summer Institute in Taxation Course Materials Order, 11 West 42nd Street, Suite 400A, New York, NY 10036, call **212-992-3320**, or email [sps.tax@nyu.edu](mailto:sps.tax@nyu.edu) to reserve your copy. See the Conference Registration Form for further details on how to order course materials.

## CONFERENCE CHECK-IN AND COURSE MATERIALS PICK-UP

The NYU School of Professional Studies Summer Institute in Taxation Registration Desk will open, and materials will be available beginning at 8 a.m. Mon.-Fri. July 17-28, 2017. Continental breakfast also begins each day at 8 a.m. Proper photo identification is required for badge retrieval. One set of conference materials on a USB flash drive per paid registrant is provided at time of badging. Badges must be displayed in all public spaces throughout the conference.

## SPECIAL NEEDS

Any participant who has special needs (physical, etc.) is encouraged to email [sps.tax@nyu.edu](mailto:sps.tax@nyu.edu) or call the Department of Finance and Law Programs at **212-992-3320** at least two weeks prior to the conference start date to indicate their particular requirement.

## SPONSORSHIP AND EXHIBIT OPPORTUNITIES

For information on becoming an Institute Sponsor or exhibiting at the Conferences, please contact Kathleen Costello at **212-992-3320** or [kathleen.costello@nyu.edu](mailto:kathleen.costello@nyu.edu).

## CONTINUING EDUCATION CREDIT

The NYU School of Professional Studies is a recognized leader in professional continuing education. The NYU School of Professional Studies Department of Finance and Law Programs has been certified by the New York State Continuing Legal Education Board as an Accredited Provider of continuing legal education in the State of New York. These conferences meet the educational requirements of many organizations and agencies with mandatory CLE/CPE filing requirements. We urge you to contact our office in advance at least 30 days prior to the conference start date at **212-992-3320** or at [sps.tax@nyu.edu](mailto:sps.tax@nyu.edu) to ensure the availability of credit for a specific MCLE state, as we cannot guarantee that credit will be applied for in all cases.

# SUMMER INSTITUTE IN TAXATION

## ESTIMATED CONTINUING EDUCATION CREDITS

### Introduction to State and Local Taxation

23.0 based upon a 50-minute hour

(including 1.0 ethics credit)

19.25 based upon a 60-minute hour

(including 1.0 ethics credit)

### Intermediate State and Local Taxation

15.5 based upon a 50-minute hour

(including 1.0 ethics credit)

13.0 based upon a 60-minute hour

(including 1.0 ethics credit)

### Introduction to Partnerships Taxation

23.0 based upon a 50-minute hour

19.5 based upon a 60-minute hour

### Introduction to Consolidated Returns

23.0 based upon a 50-minute hour

19.5 based upon a 60-minute hour

### Advanced Income Tax and Wealth Planning Conference

22.5 based upon a 50-minute hour

18.5 based upon a 60-minute hour

### Introduction to Trusts and Estates

22.0 based upon a 50-minute hour

18.5 based upon a 60-minute hour

### Introduction to International Taxation

22.0 based upon a 50-minute hour

(including 1.5 ethics credits)

18.5 based upon a 60-minute hour

(including 1.5 ethics credits)

### Advanced International Taxation

14.5 based upon a 50-minute hour

12.0 based upon a 60-minute hour

Except where indicated, CLE credits are in the categories of professional practice/practice management. CLE boards define a credit hour as either 60 minutes or 50 minutes. Recommended CPE credits are in the following NYS subject area: Taxation. NASBA Field of Study: Taxes. In accordance with the Standards of the National Registry of CPE Sponsors, CPE credits are based upon a 50-minute hour. Please note that not all state boards accept half credits.



### NASBA

The NYU School of Professional Studies Department of Finance and Law Programs is registered with the National Association of State Boards of Accountancy as a sponsor of continuing professional education on the National Registry of CPE Sponsors.

State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors through its website: [nasbaregistry.org](http://nasbaregistry.org).

New York and Texas require sponsors to individually register with their states as continuing professional education sponsors; the NYU School of Professional Studies is a registered sponsor in the State of New York (Sponsor ID# 000493) and the State of Texas (Sponsor ID# 000439).

A certificate of attendance is given to each registrant and validated upon completion of the program. For questions concerning credit hours or approvals, please call **212-992-3320** or email [sps.tax@nyu.edu](mailto:sps.tax@nyu.edu).

## ONLINE REGISTRATION

- VISIT [sps.nyu.edu/sumtax](http://sps.nyu.edu/sumtax)
- Highly recommended for fastest response
- Automated email confirmation will be sent to the email address provided to the NYU School of Professional Studies at the time of registration
- Please use an individual email address for each registrant
- Major credit cards accepted: American Express®, Discover®, MasterCard® or Visa®

## OTHER REGISTRATION OPTIONS

**Mail:** To register by mail, complete the registration form, and return it with a check or money order made payable to **New York University**. Mail to the address below. Payment must accompany the registration form. We can only accept credit card payments through the online payment portal. We do not accept faxed registrations or wire transfers as a form of payment. An email confirmation of registration will be sent to the email address provided to the NYU School of Professional Studies. Fill out a separate form for each registrant. Send to: NYU School of Professional Studies Budget Office, New York University, 7 East 12th Street, 12th Floor, New York, NY 10003, Attention: 2017 Summer Institute in Taxation. All registrations sent by mail must be received by 12 p.m. on Thursday, July 13, 2017 (Eastern Standard Time).

**On-site:** To register on-site, you may pay by check, money order, or credit card. To pay by credit card, all walk-ins will be required to self-register at available kiosks. For faster service, conference attendees should plan to register in advance online at [sps.nyu.edu/sumtax](http://sps.nyu.edu/sumtax). To register on-site, visit the NYU School of Professional Studies Registration Desk at The Westin New York beginning at 8 a.m. Mon–Fri, July 17–28, 2017.

For more information regarding administrative policies such as complaints and refunds, or if you need help registering, please call our conference administrators at **212-992-3320** or email [sps.tax@nyu.edu](mailto:sps.tax@nyu.edu).

## REGISTRATION FORM

**Online:** [sps.nyu.edu/sumtax](http://sps.nyu.edu/sumtax)

**Mail To:** NYU School of Professional Studies Budget Office,  
New York University,  
7 East 12th Street, 12th Floor, New York, NY 10003  
Attention: 2017 Summer Institute in Taxation

- |   |   |
|---|---|
| <input type="checkbox"/> Intro. to International Taxation for <b>\$1,275</b>                    | <input type="checkbox"/> Intermediate State and Local Taxation<br><b>Day Two Only for \$525</b>   |
| <input type="checkbox"/> Advanced International Taxation for <b>\$995</b>                       | <input type="checkbox"/> Intro. to Trusts and Estates for <b>\$1,275</b>                          |
| <input type="checkbox"/> Intro. to State and Local Taxation for <b>\$1,275</b>                  | <input type="checkbox"/> Advanced Income Tax and Wealth<br>Planning Conference for <b>\$1,275</b> |
| <input type="checkbox"/> Intermediate State and Local Taxation<br>Both Days for <b>\$995</b>    | <input type="checkbox"/> Intro. to Partnerships Taxation for <b>\$1,275</b>                       |
| <input type="checkbox"/> Intermediate State and Local Taxation<br><b>Day One Only for \$525</b> | <input type="checkbox"/> Intro. to Consolidated Returns for <b>\$1,275</b>                        |

### PRINTED COURSE MATERIALS—Extra Option for an Additional Fee

We are going green; to help defray costs, printed materials are available for an additional \$195 per conference. Check here if you want a printed copy of the materials and include the \$195 fee.

☐ **Printed Materials for \$195 x \_\_\_\_\_ Conference(s)**

*Included in the conference fee, registrants will be provided access to download and/or print the course materials prior to the Conference and also will receive a USB flash drive at the time of check-in containing the course materials.*

*Print or type clearly. This information will appear on the attendee list and on your badge. (Emails will not be publicized.)*

Name: \_\_\_\_\_

Firm: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_

State: \_\_\_\_\_

Zip Code: \_\_\_\_\_

Business Phone: \_\_\_\_\_

Email\*: \_\_\_\_\_

(\*Email is required—registration confirmations are sent via email.)

I am a/n ☐ CPA ☐ ATTORNEY ☐ EA ☐ OTHER

I require ☐ CLE Credit ☐ CPE Credit

FOR CLE ONLY: For which state(s) is CLE credit being requested: State: \_\_\_\_\_

## CAN'T ATTEND

If you are unable to attend a conference but would like to receive a copy of the course materials (on a USB flash drive), please send your request to: NYU School of Professional Studies, Summer Institute in Taxation Course Materials Order, 11 West 42nd Street, Suite 400A, New York, NY 10036, or call **212-992-3320** or email [sps.tax@nyu.edu](mailto:sps.tax@nyu.edu) to reserve your copy. Reserve your copy by June 30, 2017. We cannot guarantee a selection after June 30. The price for each set of materials on a USB flash drive is \$195. There is no additional charge for shipping and handling in the continental US. Please add an additional \$20 when shipping orders outside the continental US. Please make check or money order payable to New York University or email [sps.tax@nyu.edu](mailto:sps.tax@nyu.edu) to learn how to pay by credit card. **Materials are mailed at the conclusion of the Summer Institute in Taxation.**

Name: \_\_\_\_\_

Firm: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_

State: \_\_\_\_\_

Zip Code: \_\_\_\_\_

Email\*: \_\_\_\_\_

Business: \_\_\_\_\_

### PLEASE SEND ME:

- |  |  |
|--|--|
| <input type="checkbox"/> Intro. to State and Local Taxation for \$195    | <input type="checkbox"/> Intro. to International Taxation for \$195                      |
| <input type="checkbox"/> Intermediate State and Local Taxation for \$195 | <input type="checkbox"/> Advanced International Taxation for \$195                       |
| <input type="checkbox"/> Intro to Partnerships Taxation for \$195        | <input type="checkbox"/> Intro. to Trusts and Estates for \$195                          |
| <input type="checkbox"/> Intro. to Consolidated Returns for \$195        | <input type="checkbox"/> Advanced Income Tax and Wealth<br>Planning Conference for \$195 |

# SUMMER INSTITUTE IN TAXATION

**JULY 17-28, 2017**

**THE WESTIN NEW YORK AT TIMES SQUARE**  
NEW YORK, NY

Eight individual conferences make up the Institute.  
Check inside to see if one is right for you.

INTRODUCTION TO INTERNATIONAL TAXATION	JULY 17-19, 2017
ADVANCED INTERNATIONAL TAXATION	JULY 20-21, 2017
INTRODUCTION TO STATE AND LOCAL TAXATION	JULY 17-19, 2017
INTERMEDIATE STATE AND LOCAL TAXATION	JULY 20-21, 2017
INTRODUCTION TO PARTNERSHIPS TAXATION	JULY 24-26, 2017
INTRODUCTION TO CONSOLIDATED RETURNS	JULY 26-28, 2017
INTRODUCTION TO TRUSTS AND ESTATES	JULY 24-26, 2017
ADVANCED INCOME TAX AND WEALTH PLANNING CONFERENCE	JULY 26-28, 2017

For more information, call **212-992-3320**  
visit [sps.nyu.edu/sumtax](http://sps.nyu.edu/sumtax)  
email [sps.tax@nyu.edu](mailto:sps.tax@nyu.edu)

PG17-014 06/17



**NYU** | SCHOOL OF  
PROFESSIONAL STUDIES

Finance and Law Programs  
**2017 Summer Institute in Taxation**  
11 West 42nd Street, Suite 400A  
New York, NY 10036

**ATTENTION MAIL ROOM:** If the individual  
whose name is on the label is no longer employed,  
please forward this material to his/her successor.