

THE LATEST TAX DEVELOPMENTS AND PLANNING FROM TOP PRACTITIONERS



47<sup>TH</sup> <sup>THE</sup> ANNUAL

SOUTHERN FEDERAL  
TAX INSTITUTE



**OCTOBER 15-19, 2012**

**GRAND HYATT ATLANTA | IN BUCKHEAD, ATLANTA, GEORGIA**



**TWO DAY EXCLUSIVE**

**Estate Planning Presentations  
On October 18 & 19**

*The 2012 Southern Federal Tax Institute continues its proud tradition of excellence in continuing education by offering its annual Institute. This program continues to provide the most in-depth coverage of recent developments in tax and estate planning.*

*The 2012 Institute will be held in Atlanta's thriving and exciting Buckhead district at the elegant and luxurious Grand Hyatt Atlanta. Take advantage of this excellent opportunity to learn and network with your colleagues and associates.*

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# PRESIDENT'S LETTER

Dear Fellow Tax Practitioner:

On a warm summer evening in June, 1964, on the porch at the Desoto Hotel in Savannah, Georgia, our founding Southern Federal Trustees talked about and envisioned a special kind of federal taxation educational program -- a unique program that would bring together the very best speakers and beneficial topics in a friendly and cordial atmosphere. They also hoped for an experience where registrants, speakers, and Institute trustees could not only learn, but also get to know each other and network. Their plan was realized when the 1st Annual Southern Federal Tax Institute was held September 27 through October 1, 1966 at the Dinkler Motor Hotel in downtown Atlanta.

On behalf of our twenty Trustees, I invite you to join us in Atlanta at the Grand Hyatt Hotel in Buckhead for the 47th Annual Southern Federal Tax Institute as we continue the Southern Federal tradition. We have assembled for you an outstanding program presented by the best speakers who will cover in depth a wide range of topics. From the start on Monday and continuing through Wednesday, excellent speakers will present timely insights on significant 2012 income tax developments, tax legislation and proposals for tax reform, corporations and pass-through entities, international tax issues, tax accounting methods, tax-exempt entities, issues relating to employment agreements, and professional ethics. Thursday's and Friday's sessions are fully devoted to estate, gift and trust taxation, including excellent coverage of timely planning strategies. Important relevant topics in all of these areas will be addressed to keep tax practitioners up to date and on the cutting edge. We also continue to offer the flexibility of a two-day, three-day, or a five-day program to suit your schedule.

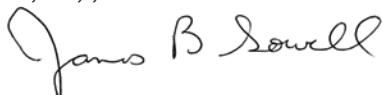
On Monday, Wednesday, and Thursday evenings, all registrants, speakers, exhibitors and sponsors are cordially invited to join the Institute Trustees for cocktails and hors d'oeuvres at the Grand Hyatt Hotel. These social events provide a wonderful opportunity for everyone to catch up with old friends and forge new relationships in a relaxed atmosphere.

We are excited to be offering registrants a "paperless" option regarding materials for the 2012 Institute. We have worked hard, addressing numerous logistical issues to help ensure that, for those who choose the "paperless" option, technical glitches will not disturb your experience. Nonetheless, we also heard loud and clear the message that not all registrants will prefer the "paperless" option, and we are continuing to provide paper volumes for those who desire to receive their materials in this format.

It is very important that you all know that the 2012 Institute is supported by a number of sponsors. Please join me in thanking them for their generous financial support. These sponsors enable us to provide you with a reasonably priced, exceptional continuing education program. On a cost per CPE/CLE hour basis, we believe that the 2012 Institute is offering one of the best values on the market.

All of the Southern Federal Tax Institute Trustees and I encourage you to join us this fall for the 47th Annual Southern Federal Tax Institute.

Very truly yours,



James B. Sowell

President

Southern Federal Tax Institute





# WHAT'S NEW IN THE INCOME TAX WORLD?

## SUNDAY EVENING, OCTOBER 14, 2012

5:30-8:00 Registration

## MONDAY MORNING, OCTOBER 15, 2012

*Kenneth L. Thrasher, Presiding*

7:15 Registration Desk Opens

8:00-9:00 Breakfast sponsored by **DEAN, MEAD, EGERTON, BLOODWORTH, CAPOUANO & BOZARTH, P.A.**

9:00-10:30 **RECENT FEDERAL INCOME TAX DEVELOPMENTS** — Significant court decisions, rulings and statutory and regulatory developments over the past twelve months, with particular focus on recent legislative changes.

**Martin J. McMahon, Jr.**, Stephen C. O'Connell Professor of Law, University of Florida College of Law, Gainesville, FL

**Ira B. Shepard**, Professor Emeritus of Law, University of Houston Law Center, Houston, TX

10:30-10:45 Break sponsored by **DIXON HUGHES GOODMAN LLP**

10:45-12:00 **RECENT FEDERAL INCOME TAX DEVELOPMENTS (Con't)**

12:15 -1:05 **Mid-day Program: FROM AUDIT THROUGH APPEALS TO LITIGATION: WHAT YOU NEED TO KNOW NOW** — Using a backdrop of the hottest issues for closely-held companies and their owners, the panel will point out the dangers you and your client face — and more importantly, the strategic opportunities for getting the best possible result. We will cover Section 7491 burden of proof, document production and defenses, the ability of the POA to handle interviews under Section 7521(c), the choice of going to Appeals by way of protest vs. petition, Appeals letter briefs, choice of trial forum and circuit, deciding how detailed your petition should be, the use of experts, and, time permitting, trial and briefing. Sponsored by **CHAMBERLAIN, HRDLICKA, WHITE, WILLIAMS & AUGHTRY** and presented by **Colin E. Blalock, CPA, Jones & Kolb, William J. Laverty, CPA, PricewaterhouseCoopers, Hale E. Sheppard, Esq., Chamberlain Hrdlicka; Moderator: David D. Aughtry, Esq., Chamberlain Hrdlicka**

## MONDAY AFTERNOON, OCTOBER 15, 2012

*Peter J. Genz, Presiding*

1:15-2:15 **TAX LEGISLATE REVIEW AND OUTLOOK** — This program will review recently enacted tax legislation and provide a legislative outlook for the remainder of 2012 and what to expect for 2013, including the potential for fundamental tax reform and the potential impact of the pending Presidential and Congressional elections. Emphasis will be placed on identifying risks and opportunities for your clients and your practice.

**Marc J. Gerson**, Miller & Chevalier, Chtrd., Washington, DC

2:15-3:15 **ENTITY CONVERSIONS AND "CROSS SPECIES" MERGERS** — An examination of the tax consequences of elective changes in tax classification through "check the box" elections under federal tax law; state law conversions between corporate and other entities; and tax classification changes effected by cross-species mergers.

**Thomas J. Nichols, J.D., C.P.A.** Meissner Tierney Fisher & Nichols S.C., Milwaukee, WI

3:15-3:30 Break sponsored by **KING & SPALDING LLP**

3:30-4:30 **NEW CURRENTS IN SELF-EMPLOYMENT TAXES AND THE DEFINITION OF "LIMITED PARTNER": PLANNING IN LIGHT OF RENKEMEYER, THE MEDICARE TAX CHANGES WHICH TAKE EFFECT IN 2013, AND OTHER DEVELOPMENTS** — Analysis of the limited partner self-employment tax exclusion after *Renkemeyer* and other judicial decisions; changes made by 2010 Health Care Act to Medicare tax regime which take effect in 2013, including new tax on net investment income; use of S corporation to mitigate self-employment tax burden where owners are active.

**Robert R. Keatinge**, Holland & Hart, LLP, Denver, CO

4:30-5:45 **LITIGATION SETTLEMENTS AND JUDGMENTS — THE MYRIAD TAX CONSIDERATIONS** — The resolution of litigation raises a host of tax considerations, ranging from reporting obligations to inclusion of litigation proceeds in gross income, the treatment of legal expenses, and the deductibility of damage awards. This presentation will address the tax treatment of back pay, severance, and other awards in employment cases, including Form 1099 and Form W-2 reporting obligations; the application of the section 104 exclusion to tort recoveries; the tax treatment of legal expenses in light of section 62(a)(20); the deductibility of litigation settlements; the scope of a "fine or penalty" under section 162(f); the deductibility of whistleblower settlements in False Claims Act cases; and Form 1099 reporting obligations relating to the disbursement of settlement payments to the client and the client's lawyers.

**Jody J. Brewster**, Skadden, Arps, Slate, Meagher & Flom LLP, Washington, DC

6:00-7:30 **Cocktail Party** sponsored by **HUNTON & WILLIAMS LLP, SUTHERLAND ASBILL & BRENNAN LLP, MILLER & CHEVALIER, Chtd.**

# BUSINESS TAXATION

## TUESDAY MORNING, OCTOBER 16, 2012

*Cameron N. Cosby, Presiding*

### PARTNERSHIPS AND REAL ESTATE

- 7:15-8:15 Breakfast sponsored by **NELSON MULLINS RILEY & SCARBOROUGH LLP**
- 8:15-9:00 **A REVIEW OF RECENT DEVELOPMENTS IN PARTNERSHIP AND REAL ESTATE TAXATION** — Review of final section 108(e)(8) regulations; issues relating to noncompensatory partnership options; uncertainties in the application of Revenue Ruling 99-6 to various transactional scenarios involving partnerships; recent regulatory, ruling and judicial developments affecting real estate investors and partnerships.  
**Robert J. Crnkovich**, Ernst & Young, Washington, DC
- 9:00-10:00 **EXTRACTING CASH FROM A PARTNERSHIP IN CONNECTION WITH A PROPERTY CONTRIBUTION: TAX-FREE OR JUST A BRILLIANT DISGUISE?** — IRS officials have indicated that changes may be in store for the disguised sale regulations that apply to property contributions to partnerships — topics will include cherry picking, qualified liability issues, leveraged partnership distributions (*Canal Corp.*, etc.), and pre-formation capital expenditure exception issues.  
**Michael Mollerus**, Davis Polk & Wardwell LLP, New York, NY • **Prof. Howard E. Abrams**, Emory University School of Law, Atlanta, GA
- 10:00-10:15 Break sponsored by **WYATT, TARRANT & COMBS, LLP**
- 10:15-11:00 **ARE REAL ESTATE GAINS BACK IN VOGUE? IT MAY BE TIME TO SHARPEN UP YOUR SECTION 1031 SKILLS** — This presentation will address pressing topics in the Section 1031 arena, including the structuring of reverse and construction exchanges; “drop-and-swap” and other partnership split-up transactions; and Section 1031(f)—it’s my (related) party and I’ll cry if I want to.  
**David Shechtman**, Drinker Biddle & Reath, LLP, Philadelphia, PA
- 11:00-12:00 **DO YOU FEEL LIKE DUSTIN HOFFMAN WHEN YOUR CLIENT DRILLS YOU ON THE TAX BENEFITS/RISKS OF A CONSERVATION EASEMENT TAX STRATEGY AND ASKS “IS IT SAFE?”** — Understanding how easement transactions work from both an economic, legal and tax perspective; charitable contribution deduction tax aspects; issues relating to leveraged property; key valuation issues; Subchapter K issues in allocating the deduction to investors; a review of how taxpayers have fared in the courts; evaluating the tax benefits and risks for your client.  
**James R. Walker**, Rothberger, Johnson & Lyons, LLP, Denver, CO • **James H. Lokey, Jr.**, King & Spalding, Atlanta, GA
- 12:15-1:05 **Mid-day Program: THE AUTOMATED DIGITAL TAX PRACTICE** — This session will focus on the technologies that are used today in an efficient tax practice. With the mandating of electronic filing and the enforcing of state security breach laws, processes have changed. We’ll cover scanning and data import, portals, electronic filing, workflow, and the use of mobile technologies. Sponsored by **CCH A WOLTERS KLUWER BUSINESS** and presented by **Mark Collins**

## TUESDAY AFTERNOON, OCTOBER 16, 2012

*Mark J. Silverman, Presiding*

### CORPORATIONS

- 1:15-2:15 **WHAT’S NEW IN THE TAXATION OF C AND S CORPORATIONS** — Review of important recent developments affecting C and S corporations, including developments in liquidation and reorganization transactions; tax attribute issues; facts and authorities to consider in determining whether a purported shareholder sale of “personal” goodwill can withstand IRS challenge; harmonizing the step-transaction doctrine, liquidation-reincorporation doctrine and Treas. Reg. § 1.368-2(k); and recent section 338(h)(10) private letter rulings.  
**Bryan P. Collins**, Deloitte Tax LLP, Washington, DC
- 2:15-3:15 **STRUCTURING BUSINESS TRANSACTIONS WITH RELATED PARTIES** — Review of various rules that impact the tax treatment of transactions between related partnerships and corporations, including section 197 anti-churning rules, sections 267 and 707(b), section 1239, section 108(e)(4); when will related party stock sales will be recast as dividends under section 304; and when will asset transfers between related corporations be recast as a “D” reorganization with boot.  
**R. David Wheat**, Thompson & Knight, LLP, Dallas, TX
- 3:15-3:30 Break sponsored by **KPMG LLP**
- 3:30-4:30 **FUNDAMENTALS OF OUTBOUND INTERNATIONAL TRANSACTIONS** — Overview of fundamental U.S. tax considerations affecting doing business abroad, including discussion of the foreign tax credit, controlled foreign corporation, passive foreign investment company and outbound property transfer rules that must be considered when U.S. persons conduct business outside the U.S. through wholly owned or joint venture entities.  
**William B. Sherman**, Holland & Knight, LLP, Ft. Lauderdale, FL
- 4:30-5:30 **TAX ISSUES IN STRUCTURING PRIVATE EQUITY AND OTHER FINANCING TRANSACTIONS** — Tax issues frequently encountered in structuring private equity, venture capital, and other transactions involving infusion of capital into a business, including overview of basic portfolio company acquisition techniques; utilization of portfolio company NOLs; effect of AHYDO rules, section 279, section 163(j) and other limitations relating to deduction of interest on acquisition debt; preferred OID issues; USRPHC status; rollover of management equity on a tax-deferred basis.  
**David F. Levy**, Skadden, Arps, Slate, Meagher & Flom LLP, New York, NY
- 5:40-7:40 **FLORIDA CPA REQUIREMENTS FOR ETHICS IN TAX PRACTICE** — Covers the ethical standards for tax practice for CPAs, including an overview of Circular 230, discussion of key provisions with examples, state accountancy rules for ethics, and the AICPA ethical guidelines in Statements on Standards for Tax Services. **For Florida CPAs only.**

# ACCOUNTING, ERISA, ETHICS, ET CETERA

## WEDNESDAY MORNING, OCTOBER 17, 2012

Stephen F. Gertzman, Presiding

7:30-8:30 Breakfast sponsored by **BENNETT THRASHER PC**

8:30-9:45 **THE 2012 "REPAIR REGULATIONS"** — They're new; they're old; they're filled with bright lines; they're dependent on facts and circumstances. What are they really, and how should taxpayers deal with them?

**Brandon Carlton**, Ernst & Young, Washington, DC

9:45-10:00 Break sponsored by **WARREN & SINKLER, L.L.P.**

10:00-11:00 **STRUCTURING TRANSACTIONS INVOLVING TAX-EXEMPT ORGANIZATIONS SO AS TO AVOID UBIT** — Overview of rules governing determination of "unrelated business taxable income" for tax exempt organizations; UBIT exclusions; debt-financed UBIT rules; issues relating to "rents from real property exclusion," including customary services, parking and other issues; UBIT issues involving joint ventures between for-profit and nonprofit organizations; circumstances under which receipt of UBIT can jeopardize tax-exempt status; partnership reporting obligations with respect to UBIT; FIN 48 traffic cop role in policing aggressive UBIT positions and update on possible extension of UTP disclosure to tax-exempts.

**Suzanne Ross McDowell**, Steptoe & Johnson LLP, Washington, DC

11:00-12:00 **TAX CONSIDERATIONS IN NEGOTIATING AND DRAFTING EMPLOYMENT AGREEMENTS** — Employment contracts implicate a variety of tax issues, and this presentation will address the most pressing, including taxable versus nontaxable benefits; section 409A implications; golden parachute (section 280G) planning; accountable reimbursement plan issues; and indemnity and clawback tax treatment.

**John L. Utz**, Utz Miller & Eickman LLC, Overland Park, KS

12:15-1:05 **Mid-day Program: ASO VS. PEO WHICH IS RIGHT FOR YOUR CLIENT'S BUSINESS?** — Most businesses today utilize some form workforce outsourcing. A PEO and an ASO both offer a combination of several business processes outsourced to a single provider. Typically these include payroll processing, human resources, employee benefits administration, workers compensation and retirement plan services. Learn more about the comparisons of PEOs and ASOs including advantages, disadvantages, and cost comparisons of the various models and why one might serve a better fit for your client.

Sponsored by **PAYROLL PROFESSIONALS OF GA, LLC** and presented by **Rhonda Champion, CPA**

## WEDNESDAY AFTERNOON, OCTOBER 17, 2012

Pamela F. Olson, Presiding

1:15-3:15 **WHAT DOES IT TAKE FOR YOUR CLIENT TO MOUNT A SUCCESSFUL PENALTY DEFENSE THESE DAYS (AND ARE YOU PART OF THE SOLUTION OR PART OF THE PROBLEM)?** — Ethical and professional problems for tax advisors who prepare returns or provide advice and then need to assert a reliance defense for their client on audit; OPR's invitation to Appeals Officers to refer the representative to OPR in a *successful* reliance defense; what's left of reliance, reasonable cause and ordinary care; a comparison of penalty defense winners and losers (contrast *Southgate Master Fund LLC* and *Canal Corp.*). (2.00 hours of ethics and professionalism)

**Karen Hawkins**, IRS Office of Professional Responsibility, Washington, DC

**Todd Welty**, SNR Denton, Dallas, TX

3:15-3:30 Break sponsored by **LATTIMORE BLACK MORGAN & CAIN, PC**

3:30-4:30 **COPING WITH AGGRESSIVE IDRS AND SUMMONSES, CHANGING PRACTICES AT APPEALS, LESS ADMINISTRATIVE GUIDANCE, AND INCREASING IRS RELIANCE ON JUDICIAL DOCTRINES** — A practical review of the consequences and proposed strategic responses to more aggressive IRS information-gathering, changing practices and personnel at Appeals, more advocacy and participation from IRS Counsel during audits, less formal administrative guidance, and increased IRS reliance on judicial doctrines.

**Gerald A. Kafka**, Latham & Watkins LLP, Washington, DC

**Rita A. Cavanagh**, Latham & Watkins LLP, Washington, DC

4:30-5:30 **EXPLORING THE LIMITS TO TREASURY'S REGULATORY POWERS** — *Mayo* changed the rules of the game but the courts have invalidated many non-Treasury regulations since *Chevron*; can taxpayers borrow a page from the Administrative Procedure Act playbook to attack Treasury regulations, as was done in the appeal of *Home Concrete* to the Supreme Court; can the IRS adopt "we win" regulations to retroactively reverse judicial precedent or to change the rules after you thought you won?

**Prof. Kristin E. Hickman**, University of Minnesota Law School, Minneapolis, MN

5:30-6:30 **Exhibitor's Cocktail Hour**

# TAILOR THE INSTITUTE

## TAILOR THE INSTITUTE TO YOUR SPECIFIC NEEDS

**THE SOUTHERN FEDERAL TAX INSTITUTE OFFERS PRACTITIONERS THE ABILITY TO CHOOSE A REGISTRATION PACKAGE THAT BEST MEETS THEIR NEEDS.**

### THE FIVE-DAY INSTITUTE:

- ■ ■ This package includes admission to all sessions and is ideal for the general tax practitioner and others who want a full week of first-rate tax instruction from the country's leading tax practitioners. This remains the favorite choice for most of our registrants and is a great way to sharpen your expertise in a broad range of tax areas.

### MONDAY THROUGH WEDNESDAY:

- ■ This choice combines the presentation on Monday through Wednesday covering Recent Income Tax Developments, Legislative Update, Entity Conversions, Self-Employment Taxes, Tax Treatment of Settlements and Judgments, Partnership Property Rollups, 1031 Exchanges, Conservation Easements, S Corporations, Related Party Transactions, International Tax, Private Equity, 2012 Repair Regulations, UBIT, Employment Agreements, Tax Penalties, and IRS Appeals. The concluding session on Wednesday afternoon deals with ethics and professionalism.

### WEDNESDAY THROUGH FRIDAY:

- ■ This package combines the Comprehensive Estate, Gift and Generation-Skipping Sessions on Thursday and Friday, including the Special Early Morning Hot Topic Session, Important Estate Tax Legislation, Key Estate Planning Techniques, Business Succession Planning, Ethical Issues in Representing Multiple Generations, Valuation Discounts, Planning for Estates Under \$10,000,000, Form 706 Preparation, State Income Taxation of Trusts, Special Need Beneficiaries, Trust as Beneficiaries of Retirement Plans, and Recent Estate Planning Developments, with the Wednesday morning presentation covering Accounting Methods, Tax Exempt Organization and Employment Tax, and the Wednesday afternoon topics dealing with Ethics and Professionalism.

### THURSDAY AND FRIDAY:

- This two-day session, which includes the Thursday and Friday presentations described in the package above, focuses exclusively on topics relevant to practitioners working primarily in the area of wealth transfer planning.

## LET US HELP YOU...

*The Southern Federal Tax Institute, Inc. is a non-profit corporation organized for the exclusive purpose of developing and presenting annually a professional institute covering current federal tax problems and issues at the post-graduate level.*

*This program is designed for the practitioner who must frequently anticipate and handle tax matters. Emphasis is placed on subjects which are new and current, including in-depth coverage of recent developments and problems which often prove difficult in planning clients' affairs and transactions.*

## WHAT WE DO...

*The speakers are tax practitioners and scholars from every section of the country. Each speaker has been selected based on his or her competence on the subject matter and the ability to communicate ably and clearly.*

*Visit [SFTI.org](http://SFTI.org) to register for the Institute and sign up for the SFTI mailing list to stay up to date with SFTI happenings!*

**BE SURE TO REGISTER OR  
VISIT US AT [WWW.SFTI.ORG](http://WWW.SFTI.ORG)**

# ESTATE PLANNING - DAY I

## THURSDAY MORNING, OCTOBER 18, 2012

*Dennis I. Belcher, Presiding*

6:30-7:30 Breakfast sponsored by **BARRY, EVANS, JOSEPHS & SNIPES**

7:30-8:15 **Special Early Morning Presentation: RECENT IRS RULINGS, REGULATIONS, AND PRONOUNCEMENTS** — Tax rulings, regulations, and court decisions are a fact of life for estate planning professionals. This panel of experts will survey the field of recent developments, highlighting those most likely to affect your daily practice.

**Panel: Ronald D. Aucutt and Diana S.C. Zeydel • Moderator: Dennis I. Belcher**

8:15-9:00 **LEGISLATIVE UPDATE** — As the clock winds down in 2012, significant changes will loom on the horizon as the federal estate and gift tax regime is scheduled to return in all of its pre-EGTRRA glory. This presentation will address any legislative reforms that either prevent or further delay this day of reckoning. Barring any such enacted legislation, the presentation will discuss legislative proposals that may be taken up in the lame duck session of Congress. **Ronald D. Aucutt**, McGuireWoods LLP, McLean, VA

9:00-9:45 **TRY IT, YOU'LL LIKE IT: SEVEN KEY ESTATE PLANNING TECHNIQUES PEOPLE ARE TALKING ABOUT TODAY** — This session will review and explain the season's hottest and most interesting planning ideas, for clients and estates of all sizes and situations. Among the timely and timeless tips and topics will be Protecting GST Trusts Against Sunset, The Better Installment Sale To The Superior Trust, Testamentary CLUTs, 99 Year and Leveraged GRATs. **Diana S.C. Zeydel**, Greenberg Traurig, LLP, Miami, FL

9:45-10:00 Break sponsored by **TAFT STETTINIUS & HOLLISTER LLP**

10:00-11:00 **BUSINESS SUCCESSION PLANNED AND UNPLANNED** — This session will use a parable to present common issues of families involved in a closely held business with other family members. Many family business owners experience competing goals. They desire to preserve for their future security the value in their business, but they also are interested in transferring ownership to pass a legacy to their descendants. Additionally, effective governance of the business and harmony among the family owners is complicated by family dynamics where one descendant is actively involved in the business and another has no involvement. The panel will provide practical solutions for balancing the goals of maintaining the strength of a successful family business and treating family members equitably in the founder's estate plan. The program will also address tax-efficient techniques for transferring the value of the family business to future generations and methods for transitioning control of the business to the next generation.

**Kimberly H. Stogner**, Womble Carlyle Sandridge & Rice, LLP, Winston-Salem, NC • **David Herritt**, Genspring Family Offices, LLC, Greenwich, CT

11:00-12:00 **ETHICAL CONSIDERATION IN REPRESENTING MULTIPLE GENERATIONS** — Representing large families is the bedrock of many estate planners' practice, yet it is easy to overlook the additional legwork upfront that is necessary to protect yourself in case family or client relations go south. Through case studies and a (brief) overview of the ethical rules, this presentation will identify potential conflicts that could arise during the course of representing large and/or multiple generations of families, propose solutions for effectively representing each client where possible, and address how the practitioner's role as a family counselor is affected. Proposals for handling both new representations and long-standing relationships will be discussed. (1.00 hour of ethics and professionalism) **Lauren Y. Detzel**, Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, P.A., Orlando, FL

12:15-1:05 **Mid-day Program: ESTATE AND TAX PLANNING FOR LIQUIDITY EVENTS** — In the life cycle of many family businesses there comes a time when the wealth created through the ownership of a successful family business is transformed through some form of liquidity event. However, extracting the wealth from the family business through a liquidity event is seldom an easy task and planning is critical in order for the voluntary or involuntary liquidity event to be successful. This program will provide an overview of the tax and estate planning issues, opportunities and pitfalls that exist when a family business is sold to a third party or merged with another company. Sponsored by **BROWN BROTHERS HARRIMAN TRUST COMPANY, N.A.** and **MOORE & VAN ALLEN PLLC** and presented by **Brett D. Sovine and Christopher J.C. Jones**

## THURSDAY AFTERNOON, OCTOBER 18, 2012

*Jean T. Adams, Presiding*

1:15-2:15 **UPDATE ON PLANNING WITH VALUATION DISCOUNTS** — Courts continue to address valuation and other tax-related issues that arise in the context of gifts and sales of beneficial interests of family limited partnerships and limited liability companies. This presentation reviews the breadth and depth of recent decisions and IRS positions, while noting the effect of these decisions and positions on current planning. **John W. Porter**, Baker Botts LLP, Houston, TX

2:15-3:15 **PORTABILITY AND PLANNING FOR THE UNDER \$10 MILLION CLIENT** — The planning uncertainty confronting married couples with \$10 million or less is stunning. Their estates could be entirely free of federal estate tax, or they may face federal estate tax for half their estates at rates exceeding 50%. They may have new planning flexibility in their planning with portability, or they may face the same old challenges in using both spouses' applicable exclusion amounts. This session will discuss the planning tools that the under \$10 million client must consider regardless of which way the law goes, and the role of portability if it ends up being a permanent part of the law.

**Thomas W. Abendroth**, Schiff Hardin LLP, Chicago, IL

3:15-3:30 Break sponsored by **TRUSTS & ESTATES MAGAZINE**

3:30-4:30 **VALUATION DISCOUNTS AND ESTATE PLANNING: NOT NECESSARILY A MARRIAGE MADE IN HEAVEN** — This presentation will explore the manner in which various estate planning strategies and vehicles actually operate when used in conjunction or funded with assets having discounted values. The asset characteristics that give rise to valuation discounts are compatible with some estate planning techniques but incompatible with others. **Charles A. "Clary" Redd**, Stinson Morrison Hecker LLP, St. Louis, MO

4:30-5:30 **PREPARING AND FILING THE FORM 706: WHO, WHAT, WHEN, WHERE, AND WHY?** — For most individuals, death is their single most important financial transaction. For estates of wealthy decedents, the preparation of the Form 706 may be the single most important item in estate administration. With portability even modest estates will choose to file. Learn the importance of how to properly prepare and file the Form 706. **Glen A. Yale**, Yale Law Firm, P.C., San Antonio, TX

5:30-7:00 **Cocktail Party** sponsored by **MANAGEMENT PLANNING, INC.**



# ESTATE PLANNING - DAY II

## FRIDAY MORNING, OCTOBER 19, 2012

*George S. Bailey, Presiding*

7:00-8:00 Breakfast sponsored by **BESSEMER TRUST**

8:00-8:45 **PLANNING TO MINIMIZE STATE INCOME TAXATION OF TRUSTS** — This presentation will examine the myriad rules and standards that govern states' imposition of income tax on nongrantor irrevocable trusts and offer suggestions regarding how to minimize state income taxes both for existing trusts and trusts to be created. The presentation will include a comprehensive appendix summarizing each state's maximum trust income tax rate and the standard(s) each state uses when determining whether a trust will be subject to its tax.

**Richard W. Nenno**, Wilmington Trust Company, Wilmington, DE

8:45-9:45 **SOPHISTICATED PLANNING TECHNIQUES FOR THE OVER \$10 MILLION CLIENT** — There are many estate planning strategies available today to assist wealthy clients in transferring wealth. This presentation will cover using these techniques to transfer wealth: family limited partnerships, private derivatives, defined value formula clauses, grantor trusts, leveraged GRATs to facilitate GST planning, the reverse freeze family limited partnership, and other sophisticated tools.

**S. Stacy Eastland**, Goldman Sachs & Co., Houston, TX

9:45-10:00 Break sponsored by **WILMINGTON TRUST FSB, GEORGIA**

10:00-11:00 **PLANNING FOR BENEFICIARIES WITH SPECIAL NEEDS** — Many families, including those of high net worth, routinely seek advice from their professional advisors on how to plan for family members challenged by disabling conditions or "special needs." Learn the "Top Ten" advance planning practice pointers designed to secure the futures of those with special needs, as well as options for modifying a faulty plan (and how to deal with no plan at all).

**Kristen M. Lewis**, Smith, Gambrell & Russell, LLP, Atlanta, GA

11:00-12:00 **MAKING RETIREMENT BENEFITS PAYABLE TO TRUSTS** — Learn how a trust can qualify for the life expectancy payout method under the IRS's "minimum distribution trust rules," how to determine trust "income" and "principal" when the trust holds an IRA, and other pitfalls of naming a trust as beneficiary of a retirement plan or IRA.

**Natalie B. Choate**, Nutter McClennen & Fish LLP, Boston, MA

12:15-1:05 **Mid-day Program:** McGuireWoods and NLEC will share their experiences to illustrate how ultra-high net worth individuals use life insurance products both as part of their investment portfolio and as a tool to transfer significant wealth to future generations. The speakers will review:

- practical guidance for the advisor analyzing policy projections from life insurance companies,
- the impact of the low interest rate environment on performance of a life insurance policy and a life insurance company's financial statements,
- the importance of investment and risk management through policy and company diversification,
- the role of the fiduciary in trust-owned life insurance, including new laws concerning investment direction and trustee delegation, and
- the possibility of using new or existing estate planning techniques (GRATs, installment sales) to reinforce the life insurance techniques.

Sponsored by **MCGUIREWOODS LLP** and **NEASE, LAGANA, EDEN & CULLEY, INC.** and presented by **Dennis I. Belcher** and **Lawton M. "Mac" Nease, III**

## FRIDAY AFTERNOON, OCTOBER 19, 2012

*Christopher J.C. Jones, Presiding*

1:15-3:15 **RECENT ESTATE PLANNING DEVELOPMENTS** — Significant court decisions, rulings and statutory and regulatory developments relating to federal trust and wealth transfer taxes.

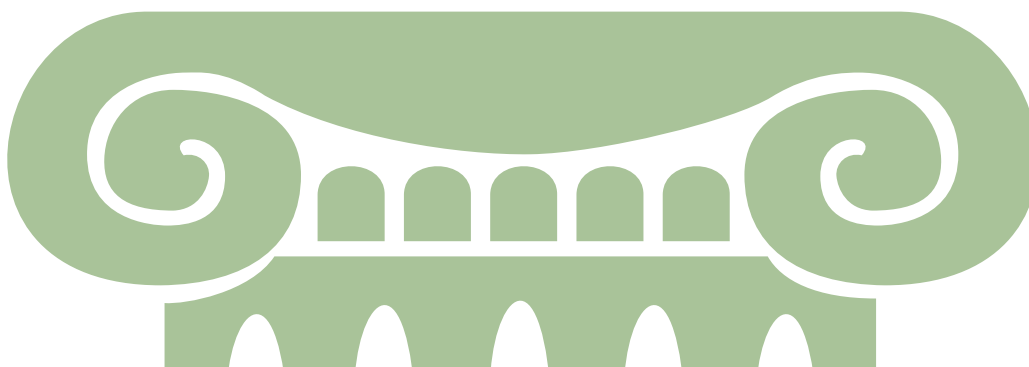
**Stanley M. Johanson**, Distinguished Teaching Professor and Fannie Coplin Regents Chair in Law, University of Texas School of Law, Austin, TX

3:15 Adjourn

### ADDITIONAL SPONSORSHIPS:

**WI-FI:** **BCG VALUATIONS**

**BINDERS:** **WOMBLE CARLYLE SANDRIDGE & RICE, PLLC**



# GRAND HYATT ATLANTA

## SFTI'S STYLISH HOST HOTEL

Located in the fashionable Buckhead district, the Grand Hyatt Atlanta is convenient to Atlanta's finest dining, shopping and nightlife for you and your colleagues. Only minutes from downtown, the plush Grand Hyatt melds seamless service with elegant décor and haute cuisine to provide an ideal setting for networking with your associates. All this plus Atlanta's tradition of warm Southern hospitality makes a stay at the Grand Hyatt Atlanta an unforgettable experience.

## ACCOMMODATIONS

The Grand Hyatt Atlanta's elegantly appointed rooms soothe the eye and spirit of every weary traveler. Peace and contentment await Institute attendees in rooms designed with comfort as the top priority.

## DINING

While Buckhead is home to many fine restaurants, you can also find delectable dining options in the hotel. For breakfast, lunch and dinner, the Grand Hyatt Atlanta's Cassis Restaurant combines award winning cuisine with the charming ambience of the garden level. The Lobby Lounge offers cocktails, light dining and entertainment for dinner. Convenient, 24-hour room service is also available.

## FACILITIES

The Grand Hyatt Atlanta offers world class amenities for you and your colleagues. The health spa features a sauna, strength and cardiovascular building equipment, steam room, outdoor pool and optional massage. For business-minded attendees, the hotel's business center can attend to every need from secretarial services, photocopies, faxes, equipment rental, and more.

## THE HEART OF ATLANTA

Join your friends and colleagues in Buckhead, Atlanta's destination for great food, abundant shopping and exciting nightlife. Home to many of the most popular restaurants in Atlanta, Buckhead provides a friendly atmosphere and boasts a wide spectrum of casual to elegant dining options, from French and Italian to Asian, New American and Eclectic.

## ATTRACTIONS

Buckhead has a variety of attractions including the Georgia Aquarium, Atlanta History Center, and the Georgia Governor's Mansion. Other Atlanta attractions, like Atlanta Braves Baseball, Atlanta Falcons Football, the Fox Theatre, High Museum of Art, Underground Atlanta, Martin Luther King, Jr. Center, Centennial Park and the Coca Cola Museum, are minutes away and easily accessible by MARTA.

## SHOPPING

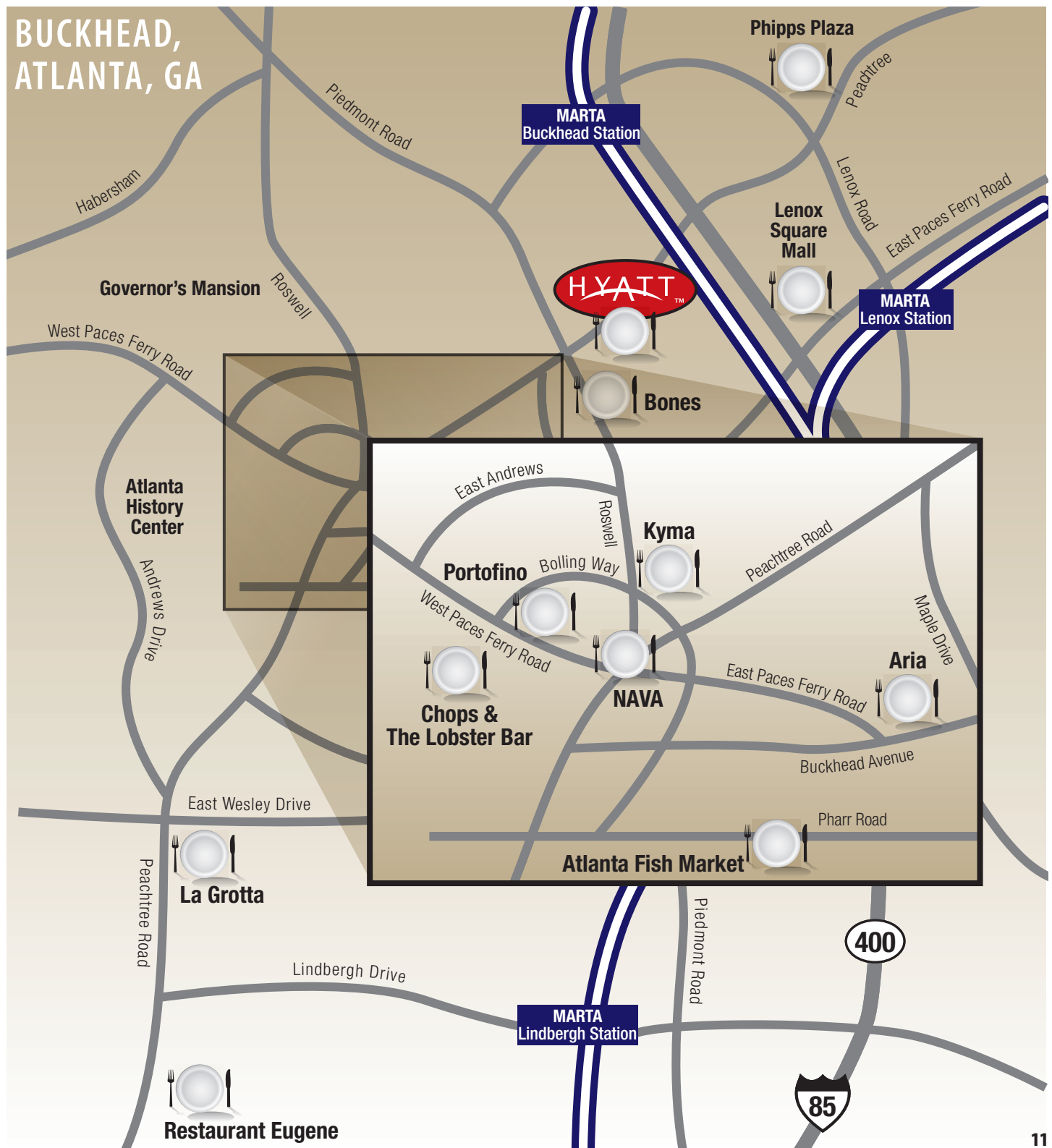
Shopping enthusiasts can join friends and colleagues at two upscale malls that are within walking distance of the hotel — Lenox Square and Phipps Plaza. Enjoy boutiques as well as grand department store shopping at Nordstrom, Saks Fifth Avenue, Neiman Marcus, Williams-Sonoma, Brooks Brothers and many other fine establishments. Both malls also feature fine restaurants.

## RESTAURANTS

Atlanta Fish Market (Seafood) • Aria (American Contemporary) • Bone's (Steakhouse) • Chops & The Lobster Bar (Seafood/Steakhouse) • Kyma (Greek) • La Grotta (Italian) • NAVA (Southwestern) • Portofino (Italian) • Restaurant Eugene (American Contemporary)

# BUCKHEAD NIGHTLIFE

Buckhead is the center of Atlanta nightlife, boasting hundreds of bars, restaurants and dance clubs, many of which are located near the Grand Hyatt Atlanta. From celebrated restaurants serving haute cuisine to nightspots that range from casual pubs to mellow jazz to exciting dance clubs. Buckhead is the hottest spot in Atlanta when the sun goes down.



# FOR YOUR INFORMATION

## REGISTRATION

Four custom registration packages are available for this year's Institute.

Two-day registration is \$695 (received by August 13, 2012); \$745 (received by September 24, 2012); \$825 (received after September 24, 2012); three-day registration (first three days or last three days) is \$795 (received by August 13, 2012); \$845 (received by September 24, 2012); \$925 (received after September 24, 2012) and five-day registration is \$995 (received by August 13, 2012); \$1,045 (received by September 24, 2012); \$1,125 (received after September 24, 2012).

A "paperless" discount of \$50 will be provided to registrants who opt to receive no hardcopy materials, and a discount of \$25 will be provided to those who opt to receive a hardcopy of only one volume of the two-volume set of materials. A discount will be provided equal to **15%** of the total registration price for firms or companies registering six or more people and **30%** for firms or companies registering 11 or more people. As registration will close at capacity, we suggest you register as soon as possible. Registration is by mail or website, and can be processed by American Express, VISA or MasterCard or a check for the full amount, payable to the Southern Federal Tax Institute, Inc. Registration will be accepted on-site, based on the availability of space and materials. All events are scheduled at the Grand Hyatt Atlanta in Buckhead. Hyatt reservations and discounted room rates are only available if you register on or before September 28, 2012.

## PAPERLESS OPTIONS

Every registrant will receive a thumb-drive containing all of the materials for this year's program along with all prior program materials dating back to 1998. In addition, every registrant will receive an e-mail in advance of the program with a link and password that will provide access to this year's materials via the internet. You will be able to download and print the materials for any programs that you desire to have at the conference. In addition, you will be able to access and download the materials at the conference via the SFTI website. There will be power strips at many tables so that registrants can use their computers for the duration of the conference. Printers will not be available at the conference, so it will be necessary to print any materials that you desire to have prior to arriving at the conference.

## SPECIAL ACCOMMODATIONS

SFTI is committed to providing equal access to our meetings for all attendees. If you are an attendee with a disability and require programmatic accommodations, please contact the SFTI office. In an effort to provide the highest quality of service

to all attendees, we require that details of all access requests be communicated in writing to our office at least 14 days in advance of the commencement of the meeting.

## BADGES

Attendees will be issued a name badge upon arrival required for admission to all events.

## BREAKFAST

A complimentary continental breakfast will be provided each morning at the time indicated on the daily schedule. Food and beverage is provided for on-site consumption only.

## MID-DAY PROGRAM

Those registrants who sign up for an optional mid-day program no later than 10:00 AM the day of the program, will be provided a box lunch free of charge when they attend.

## REFUND POLICY

Registrants who are unable to attend the Institute will receive a full refund (less a \$75 administrative fee) if a written cancellation notice, via U.S. mail or email, is received on or before October 1, 2012. The Institute will gladly accept substitutions for cancellations received after that date, but refunds will not be issued.

## FUTURE INSTITUTES

Forty-Eighth Annual Institute, October 21-25, 2013

Forty-Ninth Annual Institute, October 20-24, 2014

## AIRLINES

SFTI has arranged for discounted travel on American Airlines. Use your own travel agent or call the airline directly. American Airlines (800) 433-9790 (file #A34H2BM) or go to [www.aa.com](http://www.aa.com).

## CAR RENTAL

SFTI has arranged for discounted car rental rates with AVIS. To receive a special discount call 1-800-524-9000 x33297 and reference group AWD: D086179



# CONTINUING EDUCATION

SFTI is an advanced seminar for tax professionals versed in the field based on education in law, accounting, or business programs, or the equivalent in practical experience. The seminar consists of a series of lectures on specific topics grouped by subject matter, for which no specific advanced preparation is required. In past years, the Institute's program has been approved for CPE/CLE accreditation by states with mandatory requirements.

Objectives: Acquisition of knowledge and skills to develop proficiency as a practitioner; maintenance of professional competence as a practitioner; development of proficiency in performance of intricate and complex legal, accounting, estate and trust law tasks. SFTI is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education of 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, 150 Fourth Avenue North, Suite 700, Nashville, TN 37219-2417. Web site: [www.nasba.org](http://www.nasba.org).

For more information regarding administrative policies such as complaints and refunds, please contact our offices at (770) 640-8300.

The Institute strives to present programs that will meet most state continuing education requirements for attorneys and CPA's, and will continue to submit all of its offerings for approval by the various states' legal and accounting boards. However, several state CPA certification boards, including Florida, have recently imposed highly specific requirements for the content of qualifying ethics courses. The Institute is unable to offer state-specific ethics programs. Please consult your state's continuing education guidelines. Additionally, due to recent heightened requirements imposed by the Georgia Insurance Department, the 2012 program will not be submitted for the continuing education credit required of Georgia insurance professionals.

The 2012 program will be submitted to NASBA and the State Bars in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee and Virginia. The rules of the North Carolina State Board of CPE Examiners provide that sponsors of continuing education programs which are listed in good standing on the National Registry of CPE Sponsors maintained by the NASBA are also approved CPE sponsors. Submissions will be made to other states where necessary. The 2012 program will also be submitted for CFP approval. Various forms required by each state will be available at the registration desk.

## TOTAL COURSE HOURS\*



35.50 (60-minute hours)  
43.00 (50-minute hours)  
3.00 hours ethics  
3.00 hours professionalism  
4 hours of ethics for Florida CPAs (on Tuesday evening)

## COURSE HOURS FOR MONDAY - WEDNESDAY\*



21.75 (60-minute hours)  
27.00 (50-minute hours)  
2.00 hours ethics  
2.00 hours professionalism  
4 hours of ethics for Florida CPAs (on Tuesday evening)

## COURSE HOURS FOR WEDNESDAY - FRIDAY\*



20.50 (60-minute hours)  
25.00 (50-minute hours)  
3.00 hours ethics  
3.00 hours professionalism  
4 hours of ethics for Florida CPAs (on Tuesday evening)

## COURSE HOURS FOR THURSDAY AND FRIDAY\*



13.25 (60-minute hours)  
16.00 (50-minute hours)  
1.00 hour ethics  
1.00 hour professionalism

\* Not including Early Morning and Mid-day presentations.

**BE SURE TO REGISTER OR  
VISIT US AT [WWW.SFTI.ORG](http://WWW.SFTI.ORG)**

# SCHEDULE AT A GLANCE

## MONDAY, OCTOBER 15

### 8:00-9:00

Breakfast sponsored by DEAN, MEAD, EGERTON, BLOODWORTH, CAPOUANO & BOZARTH, P.A.

### 9:00-10:30

RECENT FEDERAL INCOME TAX DEVELOPMENTS

### 10:30-10:45

Break sponsored by DIXON HUGHES GOODMAN LLP

### 10:45-12:00

RECENT FEDERAL INCOME TAX DEVELOPMENTS (Con't)

### 12:15-1:05

Mid-day Program: WHO SAYS TAX FROM AUDIT THROUGH APPEALS TO LITIGATION: WHAT YOU NEED TO KNOW NOW. Sponsored by CHAMBERLAIN, HRDLICKA, WHITE, WILLIAMS & AUGHTRY and presented by Colin E. Blalock, CPA, Jones & Kolb, William J. Laverty, CPA, PricewaterhouseCoopers, Hale E. Sheppard, Esq., Chamberlain Hrdlicka; Moderator: David D. Aughtry, Esq., Chamberlain Hrdlicka

### 1:15-2:15

TAX LEGISLATE REVIEW AND OUTLOOK

### 2:15-3:15

ENTITY CONVERSIONS AND "CROSS SPECIES" MERGERS

### 3:15-3:30

Break sponsored by KING & SPALDING LLP

### 3:30-4:30

NEW CURRENTS IN SELF-EMPLOYMENT TAXES AND THE DEFINITION OF "LIMITED PARTNER"

### 4:30-5:45

LITIGATION SETTLEMENTS AND JUDGMENTS — THE MYRIAD TAX CONSIDERATIONS

### 6:00-7:30

Cocktail Party sponsored by HUNTON & WILLIAMS LLP, SUTHERLAND ASBILL & BRENNAN LLP, MILLER & CHEVALIER, Chtd.

## TUESDAY, OCTOBER 16

### 7:15-8:15

Breakfast sponsored by NELSON MULLINS RILEY & SCARBOROUGH LLP

### 8:15-9:00

A REVIEW OF RECENT DEVELOPMENTS IN PARTNERSHIP AND REAL ESTATE TAXATION

### 9:00-10:00

EXTRACTING CASH FROM A PARTNERSHIP IN CONNECTION WITH A PROPERTY CONTRIBUTION: TAX-FREE OR JUST A BRILLIANT DISGUISE?

### 10:00-10:15

Break sponsored by WYATT, TARRANT & COMBS, LLP

### 10:15-11:00

ARE REAL ESTATE GAINS BACK IN VOGUE? IT MAY BE TIME TO SHARPEN UP YOUR SECTION 1031 SKILLS

### 11:00-12:00

DO YOU FEEL LIKE DUSTIN HOFFMAN WHEN YOUR CLIENT DRILLS YOU ON THE TAX BENEFITS/RISKS OF A CONSERVATION EASEMENT TAX STRATEGY AND ASKS "IS IT SAFE?"

### 12:15-1:05

Mid-day Program: THE AUTOMATED DIGITAL TAX PRACTICE Sponsored by CCH A WOLTERS KLUWER BUSINESS

### 1:15-2:15

WHAT'S NEW IN THE TAXATION OF C AND S CORPORATIONS

### 2:15-3:15

STRUCTURING BUSINESS TRANSACTIONS WITH RELATED PARTIES

### 3:15-3:30

Break sponsored by KPMG LLP

### 3:30-4:30

FUNDAMENTALS OF OUTBOUND INTERNATIONAL TRANSACTIONS

### 4:30-5:30

TAX ISSUES IN STRUCTURING PRIVATE EQUITY AND OTHER FINANCING TRANSACTIONS

## WEDNESDAY, OCTOBER 17

### 7:30-8:30

Breakfast sponsored by BENNETT THRASHER PC

### 8:30-9:45

THE 2012 "REPAIR REGULATIONS"

### 9:45-10:00

Break sponsored by WARREN & SINKLER L.L.P.

### 10:00-11:00

STRUCTURING TRANSACTIONS INVOLVING TAX-EXEMPT ORGANIZATIONS SO AS TO AVOID UBIT

### 11:00-12:00

TAX CONSIDERATIONS IN NEGOTIATING AND DRAFTING EMPLOYMENT AGREEMENTS

### 12:15-1:05

Mid-day Program: ASO VS. PEO WHICH IS RIGHT FOR YOUR CLIENT'S BUSINESS? Sponsored by PAYROLL PROFESSIONALS OF GA, LLC and presented by Rhonda Champion, CPA

### 1:15-3:15

WHAT DOES IT TAKE FOR YOUR CLIENT TO MOUNT A SUCCESSFUL PENALTY DEFENSE THESE DAYS (AND ARE YOU PART OF THE SOLUTION OR PART OF THE PROBLEM)?

### 3:15-3:30

Break sponsored by LATTIMORE BLACK MORGAN & CAIN, PC

### 3:30-4:30

COPING WITH AGGRESSIVE IDRS AND SUMMONSES, CHANGING PRACTICES AT APPEALS, LESS ADMINISTRATIVE GUIDANCE, AND INCREASING IRS RELIANCE ON JUDICIAL DOCTRINES

### 4:30-5:30

EXPLORING THE LIMITS TO TREASURY'S REGULATORY POWERS

### 5:30-6:30

Exhibitor's Cocktail Hour

## THURSDAY, OCTOBER 18

### 6:30-7:30

Breakfast sponsored by BARRY, EVANS, JOSEPHS & SNIPE

### 7:30-8:15

Special Early Morning Presentation: RECENT IRS RULINGS, REGULATIONS, AND PRONOUNCEMENTS

### 8:15-9:00

LEGISLATIVE UPDATE

### 9:00-9:45

TRY IT, YOU'LL LIKE IT: SEVEN KEY ESTATE PLANNING TECHNIQUES PEOPLE ARE TALKING ABOUT TODAY

### 9:45-10:00

Break sponsored by TAFT STETTINIUS & HOLLISTER LLP

### 10:00-11:00

BUSINESS SUCCESSION PLANNED AND UNPLANNED

### 11:00-12:00

ETHICAL CONSIDERATION IN REPRESENTING MULTIPLE GENERATIONS

### 12:15-1:05

Mid-day Program: ESTATE AND TAX PLANNING FOR LIQUIDITY EVENTS. Sponsored by BROWN BROTHERS HARRIMAN TRUST COMPANY, N.A. and MOORE & VAN ALLEN PLLC

### 1:15-2:15

UPDATE ON PLANNING WITH VALUATION DISCOUNTS

### 2:15-3:15

PORTABILITY AND PLANNING FOR THE UNDER \$10 MILLION CLIENT

### 3:15-3:30

Break sponsored by TRUSTS & ESTATES MAGAZINE

### 3:30-4:30

VALUATION DISCOUNTS AND ESTATE PLANNING: NOT NECESSARILY A MARRIAGE MADE IN HEAVEN

### 4:30-5:30

PREPARING AND FILING THE FORM 706: WHO, WHAT, WHEN, WHERE, AND WHY?

### 5:30-7:00

Cocktail Party sponsored by MANAGEMENT PLANNING, INC.

## FRIDAY, OCTOBER 19

### 7:00-8:00

Breakfast sponsored by BESSEMER TRUST

### 8:00-8:45

PLANNING TO MINIMIZE STATE INCOME TAXATION OF TRUSTS

### 8:45-9:45

SOPHISTICATED PLANNING TECHNIQUES FOR THE OVER \$10 MILLION CLIENT

### 9:45-10:00

Break sponsored by WILMINGTON TRUST FSB, GEORGIA

### 10:00-11:00

PLANNING FOR BENEFICIARIES WITH SPECIAL NEEDS

### 11:00-12:00

MAKING RETIREMENT BENEFITS PAYABLE TO TRUSTS

### 12:15-1:05

Mid-day Program: McGuireWoods and NLEC will share their experiences to illustrate how ultra-high net worth individuals use life insurance products both as part of their investment portfolio and as a tool to transfer significant wealth to future generations. Sponsored by MCGUIREWOODS LLP and NEASE, LAGANA, EDEN & CULLEY, INC. and presented by LAWTON M. "MAC" NEASE, III

### 1:15-3:15

RECENT ESTATE PLANNING DEVELOPMENTS

### 3:15

Adjourn

# REGISTRATION FORM

**October 15-19, 2012**  
**Grand Hyatt Atlanta In Buckhead**  
**Atlanta, Georgia**

Name \_\_\_\_\_ Name on Badge \_\_\_\_\_  
Profession: ☐ Attorney ☐ CPA ☐ Atty/CPA ☐ CFP ☐ CLU ☐ ChFC ☐ Other \_\_\_\_\_  
Firm \_\_\_\_\_  
Mailing Address \_\_\_\_\_ City/State/Zip Code \_\_\_\_\_  
Phone ( ) \_\_\_\_\_ Fax ( ) \_\_\_\_\_ Email/Internet Address \_\_\_\_\_  
How did you learn about SFTI: ☐ Word of Mouth ☐ Direct Mail ☐ Publication (Please List) \_\_\_\_\_

**Registration fees include:** session, presentation outlines in print and electronic form, continental breakfast, Monday & Thursday evening cocktail parties and the Wednesday exhibitors' cocktail hour. Food and beverage is provided for onsite consumption only.

## REGISTRATION FEES\*

	EARLY: Received by 8/13/12	STANDARD: Received by 9/24/12	LATE: Received after 9/24/12
♦TWO-DAY REGISTRATION – ESTATE PLANNING TOPICS	10/18-10/19 (Thurs & Fri)	\$695	\$745
♦THREE-DAY REGISTRATION – GENERAL SESSIONS & ETHICS	10/15-10/17 (Mon, Tues, Wed)	\$795	\$845
♦THREE-DAY REGISTRATION – ETHICS & ESTATE PLANNING	10/17-10/19 (Wed, Thurs, Fri)	\$795	\$845
♦FIVE-DAY REGISTRATION – ALL SESSIONS	10/15-10/19 (Mon - Fri)	\$995	\$1,045
			\$1,125

\*PAPERLESS DISCOUNTS: \$50 Discount – No Hardcopy Materials • \$25 Discount – Volume 1 Only (Mon-Wed) • \$25 Discount – Volume 2 Only (Thurs-Fri)

\*OTHER DISCOUNTS: \*50% Discount for IRS/Treasury Employees. \*\*15% Discount for firms or companies registering 6 or more people – registrations must be mailed together in the same envelope (please use printable registration form). \*\*\*30% Discount for firms or companies registering 11 or more people – registrations must be mailed together in the same envelope (please use printable registration form).

**Florida CPAs:** Will you attend the Tuesday evening Ethics session (no additional cost)? ☐ Yes ☐ No

Do you plan to attend the cocktail party Monday evening? ☐ Yes ☐ No

Do you plan to attend the cocktail party Thursday evening? ☐ Yes ☐ No

Are you staying at the Grand Hyatt? ☐ Yes ☐ No

If no, where? ☐ Other hotel \_\_\_\_\_ ☐ Friend/Relative ☐ Home

Is this your first time attending SFTI? ☐ Yes ☐ No

## METHOD OF PAYMENT (Checks or VISA, MasterCard and American Express)

Enclosed is a check for \$ \_\_\_\_\_ Check# \_\_\_\_\_ (Make checks payable to: SFTI)

Please charge my (check one): ☐ Visa ☐ MasterCard ☐ American Express Account # \_\_\_\_\_ Expiration Date \_\_\_\_\_

Name of Cardholder \_\_\_\_\_ Signature \_\_\_\_\_

**Refund Policy:** Registrants who are unable to attend the Institute will receive a full refund (less a \$75 administrative fee) if a written cancellation notice is received on or before October 1, 2012.

The Institute will gladly accept substitutions for cancellations received after that date, but refunds will not be issued. Refunds will be made after the Institute. Tax ID#: 586047220

**If you are registering additional persons from your firm, please submit a registration form for each registration. This form may be photocopied. To avoid duplicate charges, DO NOT MAIL the original registration form if you have already faxed it.**

**Southern Federal Tax Institute, Inc.** • 2107 North Decatur Road • PMB 521 • Decatur, GA 30033 • 770.640.8300 • FAX 800.858.9940 • [www.sfti.org](http://www.sfti.org)

**Mail or fax this form directly to:** Reservations Department, Grand Hyatt Atlanta in Buckhead, 3300 Peachtree Road, Atlanta, Georgia 30305 or call (404) 365-8100 or (800) 233-1234; FAX (404) 364-3887.

**Reservations must be received by September 28, 2012 and prior to the block filling for discounted rate.**

## HOTEL RESERVATIONS

Name \_\_\_\_\_ Phone ( ) \_\_\_\_\_  
Address \_\_\_\_\_ City/State/Zip Code \_\_\_\_\_  
Firm Name \_\_\_\_\_ Phone ( ) \_\_\_\_\_  
Address \_\_\_\_\_ City/State/Zip Code \_\_\_\_\_  
Arrival Date \_\_\_\_\_ Time \_\_\_\_\_ Departure Date \_\_\_\_\_ Time \_\_\_\_\_

CHECK IN TIME 3:00 PM. Access to accommodations prior to 3:00 PM are subject to availability. CHECK OUT TIME 12:00 NOON

**Guaranteed Reservations: Reservations must be accompanied by deposit or credit card guarantee.**

Please hold my reservation for (check one) ☐ Guaranteed by 1st night's deposit plus 15% tax (\$ \_\_\_\_\_ enclosed)

☐ Credit Card guarantee Type \_\_\_\_\_

Credit Card No. \_\_\_\_\_ Exp. \_\_\_\_\_

Signature of Cardholder \_\_\_\_\_

SFTI expects to receive commissions from the Grand Hyatt Atlanta that are derived from room fees paid by SFTI registrants. SFTI uses these commissions to pay a portion of the expenses it incurs in producing the Institute.

**FOR GUARANTEED RESERVATIONS:** I understand that I am liable for one night's room and tax which will be deducted from my deposit, or billed through my credit card, in the event that I do not arrive or cancel by 4 PM on day prior to my arrival. An early departure fee of \$50 will be charged if you checkout prior to your scheduled departure date. Departure date can be changed up to your check-in date without penalty.

Signature \_\_\_\_\_ Gold Passport No \_\_\_\_\_

Requests for specific accommodations will be first come, first serve at check-in. Tax rate on room is 15%, subject to change. If unable to present a credit card at check-in, cash deposit is requested.

**Guest Room Information:** No. of Rooms: \_\_\_\_\_ Single (1 person) @ \$239 \_\_\_\_\_ Double (2 persons) @ \$239 (including unlimited internet access)

Bed Type: ☐ King ☐ 2 Doubles ☐ Smoking Additional persons: \$25. Children under 18 free when sharing room with parents. If room is not available at rate requested, reservations will be made at next available rate.

Share with \_\_\_\_\_

In accordance with the Americans with Disabilities Act, please notify Grand Hyatt Atlanta if you have any special needs.



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## October 15-19, 2012

**Grand Hyatt Atlanta In Buckhead** | Atlanta, Georgia



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ESTATE PLANNING**  
WEDNESDAY - FRIDAY



**ESTATE PLANNING  
TOPICS**  
THURSDAY - FRIDAY