2002

2002 William and Mary Tax Conference Speakers

2002 WILLIAM & MARY TAX CONFERENCE SPEAKERS

FARHAD AGHDAMI

Farhad Aghdami is a Shareholder in the Tax Department at Williams, Mullen, Clark & Dobbins and is the chair of the firm's Business Succession Planning Advisory Team. He works with high net-worth individuals, executives, and business owners primarily in the areas of estate and gift tax planning, business succession planning, general tax and corporate planning, and estate and trust administration..

Mr. Aghdami is the author of several articles that have appeared in *The Tax Lawyer, The Journal of Taxation* and *Probate & Property*, in addition to other journals. He previously served as the Corporate Income Tax Editor for the *Virginia Tax Reporter*. Mr. Aghdami regularly speaks at national, state and local conferences and seminars on a variety of tax and estate planning topics. He is listed in *Who's Who in American Law* and *Who's Who in America*. Mr. Aghdami is involved with various tax committees of the American Bar Association and other professional groups.

Mr. Aghdami graduated from the University of Virginia in 1989. He graduated in 1992 from Wake Forest University School of Law, where he received academic honors. He received his Masters of Laws in Taxation from Georgetown University Law Center in 1995.

CRAIG D. BELL

Craig D. Bell is a partner in the Richmond office of McGuireWoods LLP, where he practices primarily in the areas of business taxation, state and local taxation, civil and criminal tax litigation, and general tax planning. He is an adjunct professor in tax law at the College of William and Mary School of Law, at the Virginia Commonwealth University Masters in Taxation program, and a frequent lecturer at numerous tax and business conferences.

Mr. Bell has written extensively on the subjects of federal, state and local taxation. He is a Fellow of the American College of Tax Counsel, and a Past Chair of the Virginia State Bar Section on Taxation and is a former member of its Board of Governors. He is also a member of the Virginia Bar Association's Tax Counsel. Mr. Bell is a member of the William & Mary Tax Conference Advisory Council.

He received his B.S. Degree in Management and Masters in Business Administration from Syracuse University, his Juris Doctor Degree from the State University of New York, and his Masters of Law in Taxation from the Marshall-Wythe School of Law, College of William & Mary. Mr. Bell is a Lieutenant Colonel assigned to the 10th JAG Legal Support Organization, with duty at The Judge Advocate Generals School as Adjunct Professor of Tax Law.

ARTHUR E. CIRULNICK

Arthur E. Cirulnick is a partner in the Washington, D.C. law firm of Venable, Baetjer, Howard and Civiletti, LLP. Mr. Cirulnick is a member of the firm's business, corporate finance and securities practices, with an emphasis on mergers and acquisitions and corporate matters.

Mr. Cirulnick teaches business planning as an adjunct professor at The George Washington University National Law Center. He has written numerous materials for inclusion in American Law Institute-American Bar Association publications, and has authored a chapter entitled "Shareholders Agreements," published by Wiley Law Publications as part of its *Negotiating Business Transactions* text.

A frequent lecturer on business law topics on behalf of the District of Columbia Bar Continuing Legal Education program, Mr. Cirulnick has also taught continuing education courses for a Big Six accounting firm. Mr. Cirulnick graduated with a B.A. from the University of California in 1975. He received his Juris Doctor Degree from the University of San Francisco in 1979 where he graduated with honors.

JUDGE MARY ANN COHEN

Judge Cohen was appointed to the United States Tax Court in 1982 by President Reagan and reappointed in 1997 by President Clinton. She served as Chief Judge from June 1, 1996 through May 1, 2000. Judge Cohen received her undergraduate degree from the University of California at Los Angeles and her law degree from the University of Southern California School of Law.

Prior to her appointment to the Tax Court, she practiced law in Los Angeles as a member of Abbott & Cohen, a Professional Corporation, and predecessor firms. She has been active in the American Bar Association Section of Taxation and has participated throughout her career in numerous continuing legal education activities.

In May of 1997, Judge Cohen received the Dana Latham Memorial Award from the Los Angeles County Bar Association Taxation Section for contributions to the legal profession in the field of taxation. In 1999, she received the Jules Ritholz Memorial Merit Award from the ABA Tax Section Committee on Civil and Criminal Tax Penalties.

ALLAN G. DONN

Allan Donn received a B.A. from the University of Virginia, an LL. B from Harvard Law School, and an LL.M in taxation from Georgetown Law School. Mr. Donn has been active in numerous professional organizations including the Tax Sections of the Virginia State Bar and The Virginia Bar Association where he served as Chairman. Mr. Donn is on the Board of Advisors of the Journal of Limited Liability Companies and the Journal of Passthrough Entities.

Mr. Donn is the author of the Practical Guide to Limited Liability Companies, State Limited Liability Company Laws (Aspen Law & Business) and has written many articles in various tax journals.

W. BIRCH DOUGLASS, III

W. Birch Douglass, III is a partner in the Richmond office of McGuireWoods and has substantial experience in all areas of the tax law, with a focus on estate planning and planning for closely held businesses, including advising clients in the creation of private foundations and various trust arrangements.

Mr. Douglass is involved with numerous charitable organizations, including service on the Boards of Hampden-Sydney College, Hanover Tavern Foundation, and the Virginia Museum of Fine Arts Foundation. He serves on the boards of several private foundations and closely held businesses. He is a Fellow of both the American College of Tax Counsel and the American College of Trust and Estate Counsel.

Mr. Douglass is a member of the Family Firm Institute, lectures frequently on various tax subjects, and is involved with various tax committees of the American Bar Association and other professional groups. He is a graduate of Hampden-Sydney College, received his law degree from the University of Richmond, and has an LL.M. degree from Harvard Law School.

THOMAS R. FRANTZ

Tom Frantz is a partner in and co-chair of the Business Department at Williams Mullen. His practice includes tax counseling, structuring and handling capital transactions, tax controversies and litigation. Mr. Frantz also maintains a corporate practice representing multi-national corporations, handling major mergers and acquisitions, and advising corporations on a variety of legal matters.

A frequent lecturer, he has spoken about tax and corporate law at the Tax Conferences of the College of William & Mary, Old Dominion University and the University of Virginia and to numerous regional and national professional groups. Listed in three categories in Best Lawyers in America, Mr. Frantz is a past president of the Hampton Roads Tax Forum and is a director of the William & Mary Annual Tax Conference.

Mr. Frantz graduated from the College of William & Mary with an accounting degree in 1970 and from its School of Law in 1973. He obtained his license as a Certified Public Accountant in 1973 and received his Masters in Law and Taxation from William & Mary in 1981.

L. MICHAEL GRACIK, JR.

Mike Gracik Jr. has twenty-five years experience in public accounting providing tax services for publicly and privately owned business enterprises. Mr. Gracik has significant expertise in planning and structuring sales, merger and acquisition transactions; executive compensation programs, estate planning and administration; tax issues of non-profit organizations; and multi-state taxation.

Mike serves as former chairman of the Individual Taxation Committee of the American Institute of CPA's, a member of the Board of Directors of the Estate Planning Council of Richmond, and Co-Director of the Annual Virginia Conference on Federal Taxation. In a 1999 poll conducted by Richmond Magazine, he was named the top accountant in the Central Virginia area for corporate, individual, and small business taxes and for business succession planning.

MICHAEL L. LAYMAN

Michael L. Layman, an attorney and certified public accountant, received his Bachelor of Science Degree from the McIntire School of Commerce at the University of Virginia in 1967, and received his Juris Doctor degree from the University of Virginia Law School in 1971.

Mr. Layman is a member of the William and Mary Tax Conference Advisory Council and has lectured on tax topics on behalf of the Committee of Continuing Legal Education of the Virginia Law Foundation. Mr. Layman has been a member of the Legal Advisory Board of the Small Business Council of America, Inc., and a member of the Tax Section of the American Bar Association.

Since 1972, Mr. Layman has practiced as a tax attorney with an emphasis on estate planning and estate administration, small business tax planning, and pension benefit planning. He is the managing partner of the law firm of Layman & Nichols, P.C.

JOHN W. LEE

John W. Lee is a Professor of Law at the Marshall-Wythe School of Law, College of William & Mary. He received a B.A. from the University of North Carolina an LL.B from the University of Virginia and a LL.M. in Taxation from Georgetown University. Professor Lee clerked on the U.S. Tax Court 1968-1970, was associate and then partner with Hirschler, Fleischer,Weinberg, Cox & Allen, Richmond, Virginia, 1970-1981, in Federal Income Tax Practice Richmond, Virginia, and has taught at William & Mary since 1981.

He has published 45 articles including 10 on various aspects of capitalization versus expensing and collaborated with Professor Boris Bittker in the chapter on this topic among others in FEDERAL INCOME TAXATION OF INCOME, ESTATES AND GIFTS (1st ed. 1981). Professor Lee's articles in this area provided the definition of investigatory costs and start up costs in the legislative history to Section 195 and strongly shaped the recent Advance Notice of Proposed Rule Making: Guidance Regarding Deduction and Capitalization of Expenditures. He has given numerous presentations nationally and locally on tax topics. Professor Lee has been on the Planning Committee of the Virginia Tax Conference for 30 years serving as co-editor, and has been on the Advisory Committee of the William & Mary Tax Conference for 18 years.

ROBERT E. LEE

Robert Lee is a shareholder and director of the law firm of Cook, Heyward, Lonnes, Lee & Hopper, P.C. in Richmond, Virginia. Mr. Lee is a former chair of the board of governors for the tax section of the Virginia State Bar as well as a fellow in the American College of Tax Counsel and the American College of Trust and Estate Counsel.

Mr. Lee has taught at both the Virginia Commonwealth University and the University of Richmond Law School. Currently he is a member of the Board of Directors of the Community Tax Law Project. Mr. Lee received a B.S. in Accounting *summa cum laude* from St. Joseph's University and an LL.B from Harvard Law School.

MARY ANN MANCINI

Mary Ann Mancini is a partner of Steptoe & Johnson, in Washington, DC. She holds a BA from Washington College, a JD from Catholic University and her LLM in tax from the Georgetown University School of Law where she serves as an Adjunct Professor in the LLM program.

Ms. Mancini has published several articles in tax journals and is involved in numerous professional organizations. She is a fellow in the American College of Trust and Estate Counsel and is a member of the Fiduciary Income Tax Committee, American Bar Association Section of Taxation and a member of the Washington, DC Estate Planning Council.

R. MARSHALL MERRIMAN, JR.

R. Marshall Merriman, Jr. is a Managing Director with Harris Williams & Co., an investment bank specializing in mergers and acquisition advice for middle market companies throughout the United States. Harris Williams is headquartered in Richmond and has offices in Boston and San Francisco. Prior to joining Harris Williams in 1998, Mr. Merriman practiced law for fifteen years, the last nine of which were at McGuire Woods, LLP in Richmond.

LOUIS A. MEZZULLO

Louis A. Mezzullo is a member of Mezzullo & Guare, PLC, Richmond, Virginia. His principal areas of practice are taxation, estate planning, and employee benefits. He is an Adjunct Professor of Law at the University of Richmond Law School where he teaches courses in those subjects. He also lectures for the Continuing Legal Education Committee of the Virginia Bar Foundation. He is listed in *Who's Who in American Law, Who's Who in Emerging Leaders* and *Who's Who in America* and in *The Best Lawyers in America* for tax, employee benefits and trust and estates.

He has written numerous articles on the subjects of taxation, estate planning and employee benefits and has spoken at numerous tax and estate planning conferences. Mr. Mezzullo received his J.D. from the University of Richmond Law School, and a B.A. and M.A. from the University of Maryland.

He is a Fellow and Vice Chair of the American College of Tax Counsel; a Fellow of the American Bar Foundation; a Fellow of the Virginia Law Foundation; a Fellow and former Regent of the American College of Trust and Estate Counsel, as well as former Chair of its Employee Benefits in Estate Planning and Elder Law Committees; he is also co-director of the William & Mary Tax Conference.

ANDREA I. O'BRIEN

Andrea O'Brien assists clients in designing and implementing a wide range of compensation and benefit arrangements. In addition, Mrs. O'Brien advises closely-held and professional clients on business formation questions, the contractual relationships involving employees and co-owners, and the business and professional ethical issues which arise in disputes and terminations.

Mrs. O'Brien is a member in the Section of Taxation of the American Bar Association, for which she has chaired a panel on financial planning for lawyers. In addition, she is a member of the Employee Benefits Committee of the District of Columbia Bar and the DC Women's Bar Association. Mrs. O'Brien is the founder of the firm's "Women in Business Forum," which provides a platform for women executives and entrepreneurs to discuss legal and business issues. Mrs. O'Brien has co-authored several articles on current employee benefit issues and speaks frequently on employee benefit and employment law issues to professional groups and clients. Andrea O'Brien received a B.A. from the University of Notre Dame, *magna cum laude*, and her J.D. degree from Georgetown University Law Center.

DELORES A. REMO

Dee Ann Remo is a Partner in Personal Financial Planning with KPMG. Ms. Remo has over fifteen years of experience with KPMG, providing Personal Financial Planning services to corporate executives, professionals, business owners, and other high net worth individuals. She is a frequent speaker on financial planning topics and is involved in many professional and civic organizations. Ms. Remo graduated *magna cum laude* with a B.S. from West Virginia University before becoming a Certified Public Accountant.

THOMAS P. ROHMAN

Thomas P. Rohman is a partner with the law firm of McGuireWoods, LLP in Richmond, Virginia, where he is Chairman of the Firm's Taxation & Employee Benefits Department. He represents and advises businesses and their owners on matters relating to tax strategies for acquisitions, sales, joint ventures and reorganizations, federal and state income tax controversies, and general tax and business planning. He also represents a variety of Fortune 500 clients on various corporate and partnership tax matters relating to mergers, acquisitions and strategic alliances.

Mr. Rohman is also a certified public accountant, a member of the American Institute and Virginia Society of Certified Public Accountants. He is a co-author of a national treatise on S corporations published by Clark Boardman Callaghan and entitled "S Corporations: Federal Taxation." Mr. Rohman is a Fellow of the American College of Tax Counsel and has lectured at several tax seminars on various tax subjects. Mr. Rohman is on the faculty of the T.C. Williams School of Law at the University of Richmond teaching partnership taxation (and corporate taxation) and has been a faculty member of the Graduate Program at Virginia Commonwealth University teaching taxation of mergers and acquisitions.

WILLIAM L. S. ROWE

William L. S. Rowe is a partner with the law firm of Hunton & Williams, in Richmond, Virginia. He received a B.A. from Washington and Lee University and a J.D. from the University of Virginia.

He has served as Chairman of the Virginia Bar Association Committee on Taxation, on the Board of Trustees of the Virginia State Bar Section of Taxation, Chairman of the Taxation Committee of the Virginia Chamber of Commerce, and as Special Counsel to the Taxation Committee of the Virginia Manufacturers Association. He is a member of the American Bar Association Taxation Section and the Richmond Estate Planning Council, and a Fellow of the American College of Tax Counsel. He is a frequent author and lecturer on state tax matters. Mr. Rowe is a member of the Advisory Council of the William & Mary Tax Conference.

IRA B. SHEPARD

Mr. Shepard is a Professor of Law at the University of Houston Law Center. He received his undergraduate degree from Harvard College and his law degree from Harvard University, where he was an editor of the *Harvard Law Review*.

He practiced in New York City with the firm of Paul, Weiss, Rifkind, Wharton & Garrison from 1964 to 1971. Prior to joining the faculty at the University of Houston in 1975, Professor Shepard taught at the University of Georgia School of Law.

Professor Shepard has been the Special Advisor to the Southern Federal Tax Institute since 1974. He has chaired the Continuing Legal Education and Research Committee of the American Bar Association Taxation Section and the planning committee for the University of Texas Tax Conference, and has been president of the Wednesday Tax Forum. He currently sits on the boards of the (Houston) International Tax Forum and the Houston Bar Association Tax Section. He is a fellow of the American College of Tax Counsel and speaks regularly at numerous tax institutes throughout the country.

SAMUEL P. STARR

Sam Starr is currently the Tax Matters Partner (chief internal tax officer) for PricewaterhouseCoopers, LLP (USA). Mr. Starr recently served as co-leader of his firm's Pass Through Entities practice, and has advised clients and the firm's practice offices on partnerships, limited liability companies, and S corporations. Mr. Starr has co-authored a <u>BNA Tax Management Portfolio</u> on limited liability companies and various partnership tax articles. Mr. Starr also is nationally recognized for his expertise on S corporations and is the author of the two current <u>BNA Tax Management Portfolios</u> on the subject. In 1997 BNA Tax Management selected Mr. Starr as one of its Distinguished Authors.

Mr. Starr serves as a departmental editor for RIA's <u>Journal of Taxation</u>, (Partnerships, S Corporations & LLCs); and he also serves on the board of RIA's <u>Journal of Business Entities</u>. Among other professional activities, he is an active member of the AICPA and a former chair of the AICPA's S Corporation Committee. He is an adjunct professor at Georgetown University Law Center, where he teaches taxation of limited liability companies and S corporations. Mr. Starr is a frequent speaker and is quoted in the national press on general tax matters. Mr. Starr is a CPA and received his B.S. in Accounting, with honors, from the Pennsylvania State University, J.D. from the University of Virginia and LL.M. in Taxation from the Georgetown University Law School.

ANNE B. SHUMADINE

Anne Shumadine is President of Signature Financial Management, Inc. Anne's community activities include: chairman and past president of the Tidewater Scholarship Foundation, Trustee of the Chrysler Museum of Art, former rector of the Board of Visitors of Old Dominion University, Advisory Board of the William & Mary Tax Conference, Special Issues Committee of the Virginia Bar Association, director of the Economics Club of Hampton Roads, chair of ODU Educational Foundation Investment Committee, and former trustee of the William & Mary Law School Foundation.

Anne is a graduate of Wellesley College and the Marshall-Wythe School of Law at the College of William and Mary. She is a Fellow of the Virginia Law Foundation, and has been listed in *Who's Who in America* and in *Who's Who in American Women.*

PAUL H. WILNER

Paul Wilner is a Tax Partner with the Bethesda, MD, CPA firm of Grossberg Company LLP. His practice concentrates on federal income tax matters involving troubled business workouts and complex real estate, partnership, and business transactions. Mr. Wilner is Chair of the AICPA Partnership Taxation Committee, past Chair of the Greater Washington Society of CPA's Federal Taxation Committee and past Chair or Member of numerous other AICPA task forces and working groups on matters related to partnership taxation and real estate. A frequent lecturer on federal taxation issues, Mr. Wilner is author of various articles on real estate and partnership taxation.