

2013

2013 Tax Conference Speakers

Repository Citation

"2013 Tax Conference Speakers" (2013). *William & Mary Annual Tax Conference*. Paper 701.
<http://scholarship.law.wm.edu/tax/701>

WILLIAM & MARY
59TH TAX CONFERENCE SPEAKERS
NOVEMBER 6-8, 2013

JERALD D. AUGUST is Co-chair of the firm's Taxation & Wealth Planning Practice. Jerry practices out of the Philadelphia and West Palm Beach offices. His nationally recognized taxation experience includes: federal tax matters, including corporate and partnership taxation; federal transfer taxation; tax litigation and tax controversy, including trials before the United States Tax Court and appeals before the Eleventh Circuit Court of Appeals; corporate and partnership taxation; international taxation (inbound and outbound); and estate planning for owners of closely-held businesses

For four consecutive years, Mr. August has been named as one of the leading tax attorneys in Florida by *Chambers USA*. He represented the Tax Section of the Florida Bar Association before the U.S. Supreme Court in *Estate of Hubert v. Commissioner*. He also has served as adjunct professor at the University of Miami Law School, and as visiting professor for University of Pittsburgh School of Law and the Graduate Tax Program with University of Florida School of Law. Mr. August maintains his full-time residence in Jupiter, Florida, and a part-time residence in Haverford, Pennsylvania.

Mr. August has published extensively on federal taxation and lectured at leading tax institutes. He received an LL.M., Taxation, New York University School of Law, 1980; J.D., University of Pittsburgh School of Law, 1977; B.S., University of Pennsylvania, Wharton School of Business and a B.A., University of Pennsylvania, College of Arts and Sciences

DENNIS BELCHER is a Partner in the Richmond, Virginia and Tysons Corner, Virginia offices of McGuireWoods LLP; past Chair of the American Bar Association's Section of Real Property, Estate and Trust Law; past President of the American College of Trust and Estate Counsel; member of the Advisory Committee of the Heckerling Institute of Estate Planning; member of the Advisory Board of BNA Tax Management, Estate, Gifts and Trusts Magazine; listed in Town & Country Magazine top 45 estate planning lawyers in the United States; named one of America's "Leading Lawyers" Chambers USA, 2008 - 2013; named one of "Best Lawyers in America," 1987-2013; named Virginia Super Lawyer, Law & Politics, 2007-2013 (ranked number one for 2012); elected to the Estate Planners Hall of Fame 2010 by the National Association of Estate Planners and Councils; named one the 34 "Most Influential Lawyers" by the National Law Journal, 2011; numerous publications written and seminars taught including a frequent speaker at the Philip E. Heckerling Institute of Estate Planning, the AICPA and ALI-ABA estate planning seminars. He received his B.A., from the College of William and Mary, 1973 and a J. D., University of Richmond, 1976.

CRAIG D. BELL is a partner in the Richmond, Virginia office of McGuireWoods, where he practices in the area of State and Local Tax and Tax Litigation. Mr. Bell is the law

firm's head tax litigator in federal, state, and local tax disputes at the trial and appellate levels.

Mr. Bell holds a B.S. and a M.B.A. from Syracuse University and received his J.D. from the State University of New York at Buffalo. He earned an LL.M in Taxation from the Marshall-Wythe School of Law at the College of William & Mary.

Mr. Bell is an adjunct professor at the Marshall-Wythe School of Law and at the U.S. Army's Law School. He is a member of the Edgar J. Murdock Inn of Court for Tax and is on the Board of Directors of the Community Tax Law Project, a non-profit provider of *pro bono* legal representation for low-income Virginia taxpayers in U.S. Tax Court and federal district courts. He also served as the former Chair of the tax sections of the Virginia State Bar and Virginia Bar Association as well as a past Chair of the Virginia State Bar's Military Law Section. Mr. Bell frequently lectures on tax issues for a number of law and accounting professional organizations and tax conferences. He is Chairman of the Board of Directors of a publicly owned commercial bank headquartered in central Virginia.

Mr. Bell has received a number of peer accolades including election as a Fellow, American College of Tax Counsel and inclusion in *The Best Lawyers in America* in tax.

Before entering private practice, Mr. Bell spent six years on active duty in the United States Army as a Judge Advocate General. He continued his military service for an additional 21 years before retiring from the Army Reserve where he served as the Tax Advisor to The Judge Advocate General of the U.S. Army and as a Professor of Law at The Judge Advocate Generals Leadership Center and School located in Charlottesville, Virginia.

CAMERON N. COSBY – Mr. Cosby's practice focuses on Federal income tax. He has significant experience advising clients on real estate capital markets matters, including real estate investment trusts, private equity funds, real estate-related tax credits, energy projects, venture capital, partnerships and joint ventures, and mergers and acquisitions.

Mr. Cosby has structured and performed due diligence for issuers and underwriters in connection with initial public offerings and secondary public offerings of equity and debt securities of real estate investment trusts ("REITs"); represented acquirors and targets in mergers and acquisitions of public and private real estate companies and REITs; represented private equity and other private investment funds in formations, offerings, investment acquisitions, financing and divestitures; represented syndicators, sponsors and investors in low-income housing tax credit and historic rehabilitation tax credit transactions, including both single property investments and multi-property funds; and represented buyers and sellers of interests in facilities qualifying for the section 45 tax credits.

Mr. Cosby earned a B.S., from the University of Virginia and J.D., from the William & Mary School of Law.

ROBERT J. CRNKOVICH – is a member of Ernst & Young LLP’s National Tax Partnership Transactional Planning and Economics Group, where he advises on the taxation of partnerships, private equity, hedge funds, and real estate. He returned to the firm after serving as Senior Counsel in the U.S. Department of Treasury's Office of Tax Policy (Office of Tax Legislative Counsel) in Washington, D.C., where he focused on partnership matters.

For nearly 25 years, Mr. Crnkovich has been on the faculty at Georgetown University Law Center where he teaches two courses, *Advanced Partnership Taxation* and *Private Equity & Hedge Funds: Taxation and Transactions*. A frequent lecturer, Mr. Crnkovich has spoken at a number of conferences, including those sponsored by the University of Chicago Law School, New York University, the University of Virginia, the University of Southern California, the University of Alabama, the Practising Law Institute, the Tax Executives Institute, the American Bar Association, the Southern Federal Tax Institute, and the American Institute of Certified Public Accountants. He has also written extensively in the partnership area, including co-authoring the Tax Management Portfolios on *Limited Liability Companies* and *Non-compensatory Partnership Options* (to-be-released) and the following recent articles – *Son of Boss Revisited*; *Castle Harbour Strikes Again*; *Partnership Conversions – Making Something Out of Nothing*; *CFC Stock Held by Foreign Partnerships – Confusion Galore*; and *New COD-AHYDO Legislation – Needed Relief Adds Complexity*.

Mr. Crnkovich is a member of the Washington, DC bar and has earned accounting and law degrees from Marquette University and a masters of law degree from Georgetown University Law Center.

ELIZABETH E. DRIGOTAS is a Principal in the Washington DC office of Deloitte Tax LLP, focusing on employee benefits and executive compensation. Ms. Drigotas practices primarily in the areas of nonqualified deferred compensation and equity compensation, including in the context of mergers and acquisitions. Prior to joining Deloitte Tax, Ms. Drigotas worked as an Attorney Advisor in the Office of the Benefits Tax Counsel for the U.S. Treasury Department. During her tenure there, she participated in a number of regulatory projects including golden parachute regulations, incentive stock option regulations, and regulatory projects related to qualified plans. She is a frequent speaker and writer on issues concerning employee benefits and compensation, in particular on the implementation of section 409A and is one of the principal authors of 385-5th T.M. Deferred Compensation Arrangements.

Ms. Drigotas received an A.B. in History from Bowdoin College in Maine, and a J.D. from the University of North Carolina at Chapel Hill. She is a member of the Employee Benefits Committee, Section of Taxation, American Bar Association, the State Bar of Texas and the Maryland State Bar Association.

STEVEN M. FRIEDMAN is a principal in the real estate tax practice of Ernst & Young LLP, located in the firm’s National Tax Department in Washington, D.C. Steve directs all services to our homebuilding, housing and land development clients. A transactional tax advisor, Steve has more than 25 years of experience in advising publicly and privately

held companies, and their owners, engaged in real estate acquisition, construction, development, operation, finance, management and investment.

Mr. Friedman's principal areas of expertise include the structuring of transactions, restructurings, and cross-border and multinational real estate investment, finance and tax reporting and planning. He is recognized as an expert in real estate taxation, including real estate investment trusts, mortgage-backed securities, home building and land development, multifamily housing, and partnerships and limited liability companies. Mr. Friedman's clients include many publicly held and multinational enterprises (and their principal shareholders), including homebuilders, apartment owners and developers, land development companies, REITs, corporations and partnerships.

Mr. Friedman is a graduate of Georgetown University (B.S.B.A.) and the Fordham University School of Law. He is a member of the Counselors of Real Estate, a Fellow of the Homer Hoyt Institute and a Fellow of the Royal Institute of Chartered Surveyors. Mr. Friedman currently serves as chair of the Advisory Committee of the William & Mary Tax Conference and on the Advisory Board of the Pacific Coast Builders Conference.

A frequent speaker, Mr. Friedman has lectured a numerous programs and institutes, including program offerings by The Urban Land Institute, The Pacific Coast Builders Conference, The American Bar Association (Tax Section, Real Estate Committee), The California Bar, The Florida Bar, The University of Southern California Real Estate Conference, The New York University Institute on Federal Taxation and The *Big Builder* and *Builder 100* Programs.

A frequent author, Mr. Friedman has written articles appearing in *The Journal of Real Estate Taxation*, *Real Estate Taxation*, *the Journal of Partnership Taxation*, *the Tax Advisor*, *Real Estate Forum*, *Commercial Investment Real Estate Journal* and *The Real Estate Journal*.

Mr. Friedman is an active member of many professional organizations, including The Urban Land Institute, The National Association of Home Builders, The Counselors of Real Estate, The National Association of Real Estate Investment Trusts, American Bar Association (Section of Taxation, Partnership Committee).

ROBERT G. MCELROY is a tax partner with McGuireWoods LLP. He regularly advises public corporations and private companies on tax matters related to reorganizations, mergers, business acquisitions, and capital financing. He also represents emerging growth and middle market companies with tax-advantaged investment and acquisition transactions, including private equity and mezzanine debt financings. Recent transactions involved clients in diverse industries, including insurance, healthcare, manufacturing, technology and telecommunications, real estate, oil and gas, commodity trading, and retail.

Having previously served as tax counsel of a Fortune 100 multinational corporation, Mr. McElroy has substantial experience in international transactions,

including tax-free restructurings, cross-border acquisitions, foreign fund investments, and debt/equity financings.

He began his career as a certified public accountant with a national accounting firm, where he served in the firm's Washington office and later assumed responsibility for tax planning, tax audit and assurance on several Fortune 500 multinational companies and a number of large, privately held national and international businesses. He is a Fellow of the American College of Tax Counsel and an adjunct professor at Virginia Commonwealth University, where he teaches in the Masters in Taxation program.

Mr. McElroy received a B.A. from Miami University; a J.D. from Cleveland-Marshall College of Law, Cleveland State University; and an LL.M., from Georgetown University Law Center.

BRIAN J. O'CONNOR co-chairs the Tax and Wealth Planning Group for the national law firm Venable and practices in its Baltimore, MD, Washington, DC and Tysons Corner, VA offices. In addition to his role of managing the Tax and Wealth Planning Group, Mr. O'Connor provides sophisticated tax and business advice to publicly-traded and closely-held businesses and their owners. His practice focuses on foreign and domestic tax matters for partnerships, limited liability companies, joint ventures, both C and S corporations, real estate investment trusts ("REITs") and regulated investment companies ("RICs"). He is also regularly consulted by wealthy individuals and entrepreneurs on federal and state income tax matters and federal estate and gift tax issues.

Mr. O'Connor handles all types of tax matters for clients of all sizes. As a transactional tax attorney, he works on transactions ranging from small sales transactions to merger or acquisition transactions in the billions of dollars. Similarly, as a tax controversy attorney, he has represented both individual clients in small audit matters and publicly-traded corporate clients in tax disputes with amounts at issue in excess of one billion dollars. His clients often find his in-depth knowledge and broad experience very helpful in addressing both their everyday tax needs and their most difficult tax problems.

Mr. O'Connor is an adjunct professor in the graduate tax program at Georgetown University Law Center where he teaches an advanced course on partnership taxation and the preparation of partnership and limited liability company agreements. His course at Georgetown focuses heavily on the technical tax aspects of partnerships as well as the practical business and tax drafting considerations that arise in partnerships with special partners such as tax-exempt organizations, foreign investors and REITs.

Before joining Venable, Mr. O'Connor was an attorney-advisor for the Office of Chief Counsel for the Internal Revenue Service in Washington, DC where he worked on high profile legislative projects, regulations and other published guidance relating to partnerships, S corporations, trusts, common trust funds and cooperatives. His valuable experience and continuing connections with the government, when combined with his significant private practice experience, permit Mr. O'Connor to provide unique insights to his clients, both large and small, on important tax and business issues.

STEPHEN L. OWEN practices in the Washington, D.C., and Baltimore, Maryland offices of DLA Piper LLP (US). He practices primarily in the areas of mergers and acquisitions, joint ventures, business transactions, corporate and partnership tax planning, real estate tax planning, and business and estate planning for closely-held enterprises and their owners. Mr. Owen represents a variety of publicly-traded corporations and REITs, as well as many successful privately-owned businesses and entrepreneurs. Mr. Owen has written on a variety of tax and business topics, including extensive works on corporate, partnership and real estate taxation, and estate planning in various professional journals. He is a member of the editorial boards of *The Journal of Real Estate Taxation* and *The Journal of Pass-Through Entities*. He is a frequent speaker on tax and business topics at nationally recognized programs including The N.Y.U. Institute on Federal Taxation, The Southern Federal Tax Institute, N.Y.U. Real Estate Tax Institute, The Federal Real Estate Tax Conference, The New Jersey Tax Institute, The North Carolina Tax Institute, The Tennessee Tax Institute, The Kentucky Tax Institute, The National Association of Real Estate Companies Tax Conference, The William & Mary Tax Conference, The AICPA Federal Real Estate Tax Conference, The AICPA National Real Estate Tax Conference, PLI Tax Planning for Domestic and Foreign Partnerships, The Texas Tax Institute and various ALI-ABA national tax programs.

Mr. Owen is a past Chair of the Partnerships and LLCs Committee of the ABA Section of Taxation and is a past Chair of the Section of Taxation of the Maryland State Bar Association. He also served as Chair of the DLA Piper Tax Practice Group from 1998 to 2008. Mr. Owen is listed in *The Best Lawyers In America* in the categories of tax law, trusts and estates law and corporate law, and *Chambers USA: America's Leading Lawyers for Business* (D.C.). He was recognized by The Washington Business Journal as one of its "2009 Top Washington Lawyers." He is also a Fellow of The American College of Tax Counsel and is an active member of Real Estate Roundtable and NAREIT. Mr. Owen was recently appointed to the William & Mary Tax Conference Advisory Council.

WILLIAM M. RICHARDSON is a Professor of the Practice of Law at the William & Mary Law School and an Adjunct Lecturer in the Master of Accounting program at the William & Mary Mason School of Business. He was previously a partner in the law firm of Hunton & Williams LLP in Richmond, Virginia until he retired in 2008. His practice focused on federal income tax law, with emphasis on corporate acquisitions and reorganizations, financings, and controversy proceedings. A past Chair of the Corporate Tax Committee of the American Bar Association's Section of Taxation, he is a Fellow of the American College of Tax Counsel and a member of the Advisory Council for the William & Mary Tax Conference.

Mr. Richardson received a B.A. in Philosophy from the College of William & Mary in 1974 and a J.D. from the University of California, Hastings College of the Law, in 1978. He clerked at the Supreme Court of Virginia from 1978 to 1980, before joining Hunton & Williams in 1980.

THOMAS P. ROHMAN is a partner in the Richmond and Tysons Corner offices of McGuireWoods LLP and former chairman of the Firm's Taxation and Employee Benefits

Department. Mr. Rohman represents and advises businesses and their owners on a wide range of subjects including matters relating to tax strategies for acquisitions, sales, joint ventures and reorganizations, real estate transactions, and general tax and business planning.

Mr. Rohman received his B.B.A. from the University of Notre Dame, his J.D. from Michigan State University and his LL.M. in taxation from New York University. He is also a Certified Public Accountant and a member of the American Institute of Certified Public Accountants. Mr. Rohman is co-author of a national treatise on S Corporations published by Thomson/West entitled *S Corporations: Federal Taxation*. He is a fellow of the American College of Tax Counsel, and has lectured at numerous tax seminars on various tax subjects.

He is an adjunct professor at the University of Richmond's T.C. Williams School of Law, where he teaches both 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. He is also involved with various tax committees of the American Bar Association and other professional groups.

WILLIAM L.S. ROWE is a partner in the Richmond, Virginia office of Hunton & Williams LLP, where he is a member of the Tax and ERISA team. His practice focuses on taxation with emphasis on state and local tax controversy matters, including administrative appeals and litigation.

Mr. Rowe was appointed by the Governor and General Assembly of Virginia to serve as a citizen member of various legislative studies of Virginia tax laws and procedures. In addition, he has chaired Task Forces that led to establishment of Tax Policy Division of Virginia Department of Taxation and Commonwealth's administrative appeals process. He is a frequent speaker at various tax conferences.

A member of the ABA, Virginia Bar Association, and the Richmond Estate Planning Council, Mr. Rowe is a Fellow of the American College of Tax Law. He is listed in *The Best Lawyers in America* for Tax Law. Mr. Rowe received his B.A. from Washington & Lee University in 1970, and earned a J.D. from the University of Virginia in 1973.

STEVEN R. SCHNEIDER is a Tax Counsel for many national companies including real estate and private equity funds, REITs, corporations, but trade associations are what Steve Schneider is known for. Mr. Schneider is an author, commentator, and lecturer on tax topics at prominent national venues and has been an adjunct professor at Georgetown University Law Center since 2005, teaching an advanced tax course on drafting partnership and LLC agreements. He has significant experience in a wide variety of domestic and international transactions with particular experience in the taxation of pass-through entities such as partnerships, S corporations and REITs. His work crosses several industries including real estate, technology, energy, legal, and the financial sector. Mr. Schneider also brings significant knowledge through his prior experience in the IRS

National Office and in the national office of a Big-Four accounting firm. Steve is a Co-Chair of the firm's International Investors Group.

He authors a blog covering tax-related topics called [TaxLawRoundup](#). In the blog, he provides succinct and timely summaries of important US tax guidance affecting your business.

Mr. Schneider was named one of “The Best Lawyers in America.” His education includes: Georgetown University Law Center, LL.M., 1998, with Distinction, in taxation; Washington University School of Law, J.D., 1994, Order of the Coif; and University of Missouri-Columbia, B.S., 1991, *summa cum laude*.

JAMES B. SOWELL - is a Principal at KPMG LLP and leads the Real Estate Practice in KPMG’s National Tax Office. His practice is focused primarily on tax issues relating to partnerships, REITs, and debt workouts with respect to such entities. He has worked extensively in fund formation and acquisition structuring for large private equity clients. Jim was previously an Associate Tax Legislative Counsel in the Office of Tax Policy at the U.S. Treasury Department where he was responsible for legislation and guidance relating to partnerships, REITs, and like-kind exchanges. Mr. Sowell is a former Chairman of the Real Estate Committee of the American Bar Association (Tax Section) and a former Vice Chairman of the Real Estate Roundtable’s Tax Policy Advisory Committee. He currently is Chairman of the Board of Trustees for the Southern Federal Tax Institute and is an active participant on NAREIT’s Government Relations Committee. Mr. Sowell has written numerous articles and speaks extensively on partnerships and REITs.

Mr. Sowell has his undergraduate and law degrees (both with high honors) from the University of Florida and has an LL.M. in taxation from New York University, where he served as an editor on the Tax Law Review.

RUSSELL W. SULLIVAN is a former staff director for the Senate Finance Committee, advises clients on strategy and business planning as a senior advisor to McGuireWoods Consulting. He also provides strategic legal counsel to the McGuireWoods LLP clients, offering comprehensive solutions from an administrative, regulatory and legislative perspective to some of their most complex matters. He brings a unique perspective to a wide variety of issues facing a broad range of industries, including tax, healthcare, energy, pensions, transportation, education, trade and economic development, as well as matters involving the nonprofit and for-benefit enterprise sectors.

Mr. Sullivan began working on Capitol Hill in 1995 and joined the Senate Finance Committee staff in 1999. He served as the staff director to the committee from 2004 until his retirement from the Senate in 2013. During his tenure, many of the most complex issues facing the business community came before the committee. A native of Little Rock, Arkansas, Mr. Sullivan graduated from Baylor University and received his law degree from the University of Texas. He is active in the community, and serves on the board of Capital Area Reach, a mentoring program for students in the Washington, D.C. area.