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William & Mary Annual Tax Conference

Conferences, Events, and Lectures

1995

1995 Schedule

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41st William & Mary

Tax Conference

December 1-2, 1995

Hot Topics in
Real Estate,
and More

FORTY-FIRST WILLIAM AND MARY TAX CONFERENCE

TABLE OF CONTENTS

	<u>Tab</u>
Mark Your Calendars: 42nd W&M Tax Conference - Dec. 6 & 7	
Tax Conference Schedule	1
Speaker Profiles	2
CLE and CPE Forms	3
Friday, December 1, 1995	
FOCUS: HOT TOPICS IN REAL ESTATE	
9:00 a.m. - 12:15 p.m.	
Choice of Entity Issues	4
<u>The Virginia Limited Liability Company</u> James J. Wheaton	pages A 1-19
<u>Limited Liability Partnerships</u> James J. Wheaton	pages B 1-12
<u>Choice of Entity - Tax Issues</u> Lisa M. Landry	pages C 1-13
<u>Choice of Entity - General Considerations</u> L. Michael Gracik, Jr.	pages D 1-4
<u>Choice of Entity - Flexibility, Exit Strategy</u> Thomas R. Frantz	pages E 1-23
<u>Hypotheticals:</u>	
<u>Numbers 1 & 2</u> Lisa M. Landry	pages F 1
<u>Case Studies: Operating Business and Venture Business</u> James J. Wheaton	pages G 1-2
<u>Case Studies: Small Professional Services Organization and Large Professional Services Organization</u> L. Michael Gracik, Jr.	pages H 1-2
<u>Case Studies: Scenarios Nos. 1, 2 & 3</u> Thomas R. Frantz	pages I 1-2

Friday, December 1, 1995

1:45 p.m. - 5:00 p.m.

Creative Real Estate Tax Planning

Tab

5

<u>The Year in Review: A Discussion of Significant Regulations, Rulings and Cases</u> Stefan F. Tucker	pages	A 1-96
<u>Tax Considerations in the Formation and Operation of Limited Liability Companies</u> Blake D. Rubin	pages	B 1-39
<u>Principal Differences in Application of Classification Rules to Limited Liability Companies Compared to Limited Partnerships</u> Blake D. Rubin	pages	C 1-4
<u>Planning Opportunities Remain Under the Final Partnership Allocation Rules for Contributed Property</u> Michael G. Frankel	pages	D 1-50
<u>Allocation of Nonrecourse Liabilities: IRS Takes Two Steps Forward, One Back</u> Michael G. Frankel	pages	E 1-9
<u>Partnership Workouts: Problems and Solutions Under Final Section 704(b) and 752 Regulations</u> Michael G. Frankel	pages	F 1-49
<u>Partnership Issues in Developing Section 1017 Regulations (IRS submission)</u> Blake D. Rubin	pages	G 1-4
<u>Focus on Capitalization v. Deductability-- Environmental Remediation</u> Stefan F. Tucker	pages	H 1-8
<u>Tax Treatment of Environmental Cleanup Costs</u> Blake D. Rubin	pages	I 1-30
<u>Planning for the Taxable Disposition of Overleveraged Property</u> Blake D. Rubin	pages	J 1-9
<u>The Like Kind Exchange: Everything You Needed to Know, Whether or Not You Wanted to Ask</u> Stefan F. Tucker	pages	K 1-33
<u>Creative Financing</u> Stefan F. Tucker	pages	L 1-32

<u>Topic</u>	<u>Tab</u>
Saturday, December 2, 1995	
8:00 a.m. - 9:00 a.m. - Auditorium	
<u>Jurisdiction and Nexus</u> John B. Harper	6
9:00 a.m. - 10:00 a.m. - Auditorium	
<u>Ethical Issues in Tax Practice</u> Robert I. Brauer James P. Holden	7
<u>Office of Director of Practice</u> Robert I. Brauer	8
10:15 a.m. - 11:45 a.m. - Auditorium	
<u>Recent Federal Income Tax Developments</u> Ira B. Shepard	9
1:15 p.m. - 2:30 p.m. - Auditorium	
<u>Determining the Assets Necessary to Retire, Including Gift and Estate Planning Applications</u> Bruce J. Temkin	10
2:30 p.m. - 3:45 p.m. - Auditorium	
<u>Creative Uses of Split Dollar Life Insurance</u> John H. Milne	11
4:00 p.m. - 5:00 p.m.	
Session A - Rooms AB&C	
<u>Reforming Legal Ethics in Virginia</u> John M. Levy	12
Session B - Auditorium	
<u>Planning for Distribution from Qualified Retirement Plans and IRAs</u> Louis A. Mezzullo	13
<u>Integrating Qualified Plan Distributions into the Overall Financial and Estate Plan</u> Bruce J. Temkin	14

**1995 William and Mary Tax Conference
Schedule of Activities**

<u>Time</u>	<u>Activity/Topic</u>	<u>Location</u>
Friday Morning, Dec. 1		
7:30am	Coffee	Foyer/N.Gallery
8:00am- 9:00am	Registration	East Gallery
8:50am- 9:00am	Welcome and Introduction	Auditorium
9:00am-12:15pm	Choice of Entity Issues	Auditorium
10:00am-10:15am	Break	Foyer/N.Gallery
12:15pm- 1:45pm	Lunch Washington Up-Date	Virginia Room
Friday Afternoon		
1:45pm- 5:00pm	Creative Real Estate Tax Planning	Auditorium
3:15pm-3:30pm	Break	Foyer/N.Gallery
5:00pm-6:00pm	Cash Bar Reception	North Gallery
Saturday Morning, Dec. 2		
8:00am- 9:00am	When May a State Require an Out-of-State Entity to File Returns and Pay Taxes?	Auditorium
9:00am-10:00am	Ethical Issues in Tax Practice	Auditorium
10:00am-10:15am	Break	Foyer/N.Gallery
10:15am-11:45am	Current Developments in Income Taxation	Auditorium
11:45am- 1:15pm	Lunch On Your Own	

<u>Time</u>	<u>Activity/Topic</u>	<u>Location</u>
Saturday Afternoon		
1:15pm- 2:30pm	Determining the Assets Necessary to Retire	Auditorium
2:30pm- 3:45pm	Creative Use of Split Dollar Life Insurance	Auditorium
3:45pm- 4:00pm	Break	Foyer/N.Gallery
Concurrent Sessions:		
<u>Session A:</u>		
4:00pm- 5:00pm	Legal Ethics	Rooms ABC
<u>Session B:</u>		
4:00pm- 5:00pm	Qualified Retirement Plan Workshop	Auditorium