

THE LATEST TAX DEVELOPMENTS AND PLANNING FROM TOP PRACTITIONERS



53<sup>RD</sup> <sup>THE</sup> ANNUAL

SOUTHERN FEDERAL  
TAX INSTITUTE



**OCTOBER 22-26, 2018**

**GRAND HYATT ATLANTA**  
IN BUCKHEAD, ATLANTA, GEORGIA  
Register Online at: [www.sfti.org](http://www.sfti.org)

**NEW ATTENDEES** receive 50% off the registration fee

**TWO DAY EXCLUSIVE**  
Estate Planning Presentations On Oct 25-26

PLATINUM SPONSOR

**DIVERSIFIED TRUST**

COMPREHENSIVE WEALTH MANAGEMENT



*The Southern Federal Tax Institute continues its proud tradition of excellence in continuing education by offering its annual Institute.*

*This program provides the most in-depth coverage of recent developments and cutting-edge topics in tax and estate planning.*

*The 2018 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.*

## BOARD OF TRUSTEES

### OFFICERS

#### CHAIRMAN OF THE BOARD

**Cameron N. Cosby**

Hogan Lovells US LLP  
Washington, DC

#### PRESIDENT

**Christopher J.C. Jones**

Moore & Van Allen PLLC  
Charlotte, North Carolina

#### VICE PRESIDENT

**Kimberly H. Stogner**

Womble Bond Dickinson LLP  
Winston-Salem, North Carolina

#### SECRETARY

**James B. Sowell**

KPMG LLP  
Washington, DC

#### TREASURER

**Martha Louise R. Lewis**

Ramage Lewis LLC  
Greenville, South Carolina

#### SPECIAL ADVISOR TO THE BOARD

**Professor Cass Brewer**

Georgia State University  
College of Law  
Atlanta, Georgia

### BOARD

**Tiffany A. Altizer**

Keith Altizer & Co. P.A.  
Maitland, Florida

**David D. Aughtry**

Chamberlain, Hrdlicka, White,  
Williams & Aughtry  
Atlanta, Georgia

**Reginald J. Clark**

Eversheds Sutherland (US) LLP  
Atlanta, Georgia

**Jeffery S. Drummonds**

LBMC, PC  
Brentwood, Tennessee

**Peter J. Genz**

King & Spalding LLP  
Atlanta, Georgia

**Michael A. Laing**

Taft Stettinius & Hollister LLP  
Cincinnati, Ohio

**Frank S. Macgill**

HunterMaclean  
Savannah, Georgia

**Pamela F. Olson**

PricewaterhouseCoopers LLP  
Washington, DC

**Alan F. Rothschild, Jr.**

Page, Scrantom, Sprouse,  
Tucker & Ford, P.C.  
Columbus, Georgia

**David C. Sojourner, Jr.**

Sojourner Caughman & Thomas, LLC  
Columbia, South Carolina

**Kenneth L. Thrasher**

Bennett Thrasher LLP  
Atlanta, Georgia

**R. David Wheat**

Kirkland & Ellis LLP  
Houston, Texas

### ADVISORY

**Jean T. Adams**

Durham, North Carolina

**R. Keith Altizer**

Maitland, Florida

**George S. Bailey**

Columbia, South Carolina

**Scott Y. Barnes**

Charleston, South Carolina

**Herschel M. Bloom**

Atlanta, Georgia

**William M. Blume, Jr.**

Mount Pleasant, South Carolina

**Thomas A. Caldwell**

Signal Mountain, Tennessee

**Thomas N. Carruthers, Jr.**

Birmingham, Alabama

**Mark S. Dray**

Richmond, Virginia

**H. Mitchell Dunn, Jr.**

Savannah, Georgia

**Charles H. Egerton**

Orlando, Florida

**Richard E. Fogg**

Free Union, Virginia

**William C. Fowler**

Atlanta, Georgia

**Stephen F. Gertzman**

Washington, DC

**Lawrence B. Gibbs**

Washington, DC

**James C. Gooch**

Nashville, Tennessee

**Harry V. Lamon, Jr.**

Atlanta, Georgia

**Lauch M. Magruder, Jr.**

Highlands, North Carolina

**Neill G. McBryde**

Charlotte, North Carolina

**Robert W. Meherg**

Hendersonville, North Carolina

**Mark J. Silverman**

Washington, DC

**J. Kenneth Tomlinson**

Columbia, South Carolina

**Robert C. Walthall**

Birmingham, Alabama

**Joyce A. Waterbury**

Carrboro, North Carolina

### EXECUTIVE DIRECTOR

**Mallory L. Decker**

Decatur, Georgia

# PRESIDENT'S LETTER



Dear Tax Advisor,

On behalf of the Trustees of the Southern Federal Tax Institute ("SFTI"), it is my distinct honor to invite you to join us at the Grand Hyatt Atlanta in Buckhead for the 53rd Annual Southern Federal Tax Institute. We will gather again in October to learn from some of the most distinguished tax professionals in the country. Each year it is the goal of the SFTI Board of Trustees to provide timely and cutting edge information to help you better advise and counsel clients and do it with a touch of southern hospitality.

The major focus of the 53rd Southern Federal Tax Institute will be the newly enacted Tax Cuts & Jobs Act ("TCJA") and how it will impact our practices. The Institute will start Monday morning with an overview of federal income tax developments since last year's Institute. On Monday afternoon, we will have several in-depth presentations on the new IRC §199A. The Tuesday morning programs will focus on how the tax reform changes will affect partnerships and real estate and Tuesday afternoon will focus on the significant changes to corporate tax law. On Wednesday morning, we will address international tax reform and the tax aspects of private equity compensation and Wednesday afternoon will have several interesting presentations related to tax controversy. Thursday and Friday will again focus on estate planning topics, beginning with Clary Redd presenting on Estate Planning after TCJA and the estate planning program will end on Friday afternoon with Professor Sam Donaldson speaking on recent developments.

We continue to offer the flexibility of two-day, three-day or five-day programs. The comprehensive outlines provided by our speakers are a hallmark of the SFTI. This year we are again offering a 50% discount to first-time attendees. It is the hope of the Trustees that the first-time attendee discount will encourage younger practitioners to attend the Institute, but any first-time attendee can take advantage of the discount. With the significant amount of tax law changes as a result of the passage of TCJA, it is imperative for all of us, whether new practitioners or experienced veterans, to make sure we are up to speed on all the changes.

In addition to the great substantive program we have put together, we also want to extend an invitation to join us at our receptions on Monday, Wednesday and Thursday evenings. The cocktail parties are a wonderful opportunity to renew friendships with colleagues and network with the region's leading tax practitioners. We also encourage you to meet and thank our sponsors. Their support and generosity plays an important part in delivering programs that are exceptional both in quality and value.

We look forward to seeing you at the 53rd Annual Southern Federal Tax Institute.

Christopher J. C. Jones

A handwritten signature in black ink, appearing to read 'Chris Jones', written over a light blue background.

President  
Southern Federal Tax Institute

# WHAT'S NEW IN THE INCOME TAX WORLD?

## SUNDAY EVENING, OCTOBER 21, 2018

5:30-8:00 Registration Begins

## MONDAY MORNING, OCTOBER 22, 2018

Cameron N. Cosby, *Presiding*

7:15 Registration Desk Opens

8:00-9:00 Breakfast

9:00-10:30 **RECENT FEDERAL INCOME TAX DEVELOPMENTS** – This session highlights significant changes affecting taxpayers over the past twelve months, including court decisions, rulings, and statutory and regulatory developments.

**Bruce A. McGovern**, Professor of Law and Director, Tax Clinic, South Texas College of Law Houston, Houston, TX

**Cassady V. "Cass" Brewer**, Associate Professor of Law, Georgia State University College of Law, Atlanta, GA

10:30-10:45 Break

10:45-12:00 **RECENT FEDERAL INCOME TAX DEVELOPMENTS (CONT'D)**

12:15-1:05 **Mid-Day Program: WHAT EVERY FAMILY BUSINESS AND FAMILY OFFICE NEED TO KNOW** – On the income tax side, the multi-year repeal of the Section 212 investment expense deduction in the 2017 Tax Cut and Jobs Act compel family offices and businesses to take a harder look at protecting their "trade or business" status under *Lender*. On the estate and gift tax side, a long anticipated opinion will shed new light on S-Corp tax affecting and USPAP 93 recognition that non-controlling interests get no benefit from non-operating assets. And perhaps most importantly, that case teaches us how principled families can best preserve their businesses for generations to come.

Sponsored by **Chamberlain, Hrdlicka, White, Williams & Aughtry** and presented by **Alan J. Zachariah, John W. Hackney, David D. Aughtry** and

**Stephanie Brun de Pontet**

## MONDAY AFTERNOON, OCTOBER 22, 2018

Jeffery S. Drummonds, *Presiding*

1:15-2:45 **FOR SELECT TAXPAYERS ONLY: 20% OFF UNTIL 2026! NEW IRC § 199A AND "QUALIFIED BUSINESS INCOME"** – New § 199A allows noncorporate taxpayers a special deduction (subject to limitations) equal to 20% of qualified business income ("QBI"). Essentially, the Tax Cuts and Jobs Act results in a 20% reduction in tax rates until 2026 for those noncorporate taxpayers earning QBI who can structure their operations and report as required to take advantage of new § 199A. This panel explores new § 199A in depth, including the use of LLCs, S corporations, management companies, compensation arrangements, and other strategies to maximize QBI and the benefits of new § 199A.

**Adam S. Feuerstein**, Principal, PricewaterhouseCoopers LLP, McLean, VA

**Sarah Ritchey Haradon**, Associate, Holland & Hart LLP, Denver, CO

2:45-4:00 **THE EMPLOYEE VS. INDEPENDENT CONTRACTOR DETERMINATION – MORE IMPORTANT THAN EVER** – Properly classifying someone as an independent contractor or employee involves a fact-sensitive analysis that derives from a complicated set of factors. This determination is more relevant than ever with new § 199A and the 20% deduction for QBI, given that the deduction does not apply to employee compensation but often will apply to compensation paid to an independent contractor. The employee vs. independent contractor determination has long been a focus in IRS audits, and given the increased stakes, it is likely that the pressure associated with this issue will only increase. This session will provide strategies for evaluating independent contractor relationships and avoiding claims of independent contractor misclassification.

**Todd H. Lebowitz**, Partner, BakerHostetler LLP, Cleveland, OH

4:00-4:15 Break

4:15-5:30 **STATE TAX UPDATE, WITH A FOCUS ON THE IMPLICATIONS OF TCJA** – With TCJA's dramatic reduction in corporate rates, \$10,000 limitation on personal deductions for state and local taxes, and the impact of new § 199A on independent contractor versus employee status, not to mention SCOTUS's reconsideration of *Quill*, state and local tax planning is even more critical. This expert panel addresses TCJA's immediate implications for state and local tax planning, and gazes into the crystal ball of what the future may hold.

**James H. Adams**, Principal, Ernst & Young LLP, Atlanta, GA

**Brian B. McCuller**, Shareholder, LBMC, PC, Nashville, TN

5:30-7:00 **Cocktail Party**



# BUSINESS TAXATION

## TUESDAY MORNING, OCTOBER 23, 2018

Peter J. Genz, *Presiding*

7:00-8:00 Breakfast

8:00-9:15 **HOT TAX REFORM TOPICS AFFECTING PARTNERSHIPS AND REAL ESTATE** — This expert panel provides an analysis of important tax reform issues relating to partnerships and real estate. Topics include: (i) planning for carried interests under new § 1061; (ii) government contributions to real estate projects under § 118; (iii) modifications to § 1031; (iv) changes to the historic rehabilitation tax credit rules; (v) the new regime for qualified opportunity zones; (vi) the repeal of partnership technical terminations; (vii) the overturn of *Grecian Magnesite Mining* by new § 864(c)(8) (including the related 10% transferee and partnership withholding under § 1446(f)); (viii) changes to partnership basis adjustment rules; (ix) lower corporate rates and implications for FIRPTA; and (x) TCJA implications for PTPs, REITs, and their owners.

**Ana G. O'Brien**, Partner, Latham & Watkins LLP, Los Angeles, CA

**Mark Schwed**, Partner, Weil, Gotshal & Manges LLP, New York, NY

9:15-10:15 **MAKING SENSE OF THE EVER-EXPANDING LOSS LIMITATION REGIMES** — By modifying the rules relating to deductibility of NOLs and creating a new loss limitation regime for “excess business losses,” TCJA has compounded what already was a complicated maze of rules relating to loss limitations. This session will analyze the interplay of the various loss limitation regimes, specifically addressing modified § 172 (NOLs), new § 461(l) (excess loss limitation), and §§ 465 (at risk), 469 (passive loss), and 704(d) (partnership basis).

**Brent Clifton**, Shareholder, Winstead PC, Dallas, TX

10:15-10:30 Break

10:30-11:15 **IT'S 2018 AND THE NEW PARTNERSHIP AUDIT REGIME IS A HARSH REALITY — NOW WHAT?** — The new partnership audit rules went “live” as of this year. While audits under the new regime are still likely a couple of years off, it is necessary to consider these rules currently in drafting or amending partnership agreements and in negotiating transactions involving partnerships or partnership interests. The regime applies to a shockingly broad array of transactions and is extremely complicated. We have seen technical corrections and hundreds of pages of regulations applying and interpreting these rules. This presentation will provide the latest guidance, tips, and strategies to cope with the new partnership audit rules.

**Steven R. Schneider**, Partner, Baker & McKenzie LLP, Washington, D.C.

11:15-12:00 **MORE TCJA SURPRISES PART I: NEW LIMITATIONS ON DEDUCTING BUSINESS INTEREST FOR PARTNERSHIPS AND REAL ESTATE** — TCJA amended § 163(j) to impose limits on the deductibility of business interest. While real estate businesses may elect to be exempt from these rules, questions exist regarding the scope of those qualifying for the exemption and when the election will be beneficial. The new rules applicable to partnerships are inordinately complex and also irrational in many contexts. This session reviews the limitations on deductions for interest expense in the partnership and real estate context with an emphasis on TCJA's amendments to § 163(j).

**Stephen J. Giordano**, Principal, KPMG LLP, Washington, D.C.

12:15-1:05 **Mid-Day Program: To Be Announced**

## TUESDAY AFTERNOON, OCTOBER 23, 2018

R. David Wheat, *Presiding*

1:15-2:00 **MORE TCJA SURPRISES PART II: NEW LIMITATIONS ON DEDUCTING BUSINESS INTEREST FOR CORPORATIONS** — As explored in the morning session, TCJA amended § 163(j) to impose new limits on the deductibility of business interest. This session explores these new limitations in the context of corporations and alternative capital structuring opportunities that should be considered.

**Michael B. Shulman**, Partner, Shearman & Sterling, New York, NY

2:00-3:15 **BACK TO THE FUTURE FOR C CORPORATIONS? EXAMINING THE CHOICE OF ENTITY ANALYSIS AFTER TCJA** — By lowering the top rate on C corporations to 21%, including personal service corporations, while simultaneously enacting new § 199A to provide a tax break for individual and trust/estate owners of flow-through entities, Congress has given new life to the old choice-of-entity analysis. In fact, reversing the trend since 1986, C corporations may be the best choice in some circumstances. This presentation reexamines the choice-of-entity analysis in light of TCJA and outlines the circumstances where a C corporation may or may not make sense.

**Scott M. Levine**, Partner, Jones Day, Washington, D.C.

3:15-3:30 Break

3:30-4:30 **MERGERS, ACQUISITIONS, AND OTHER CORPORATE REORGANIZATIONS AFTER TAX REFORM** — Do spin-offs still make sense after TCJA? Or, should we instead expect mergers and consolidations to increase? If so, are stock purchases more likely now? This panel explores the implications of tax reform on § 355 transactions, mergers, acquisitions, and other corporate reorganization transactions.

**Karen Gilbreath Sowell**, Principal, Ernst & Young LLP, Washington, D.C.

**Brian W. Reed**, Principal, Ernst & Young LLP, Washington, D.C.

4:30-5:30 **DUE DILIGENCE FOR TARGET S CORPORATIONS AND C CORPORATIONS** — Thanks to TCJA, our list of due diligence questions for target S and C corporations just got longer. Moreover, for acquisitions taking place this year, last year's tax returns may not reveal next year's problems. This presentation distills all the old and new questions into a tax due diligence primer that can help your client avoid buying into trouble, now and in the future.

**Gregory N. Kidder**, Partner, Steptoe & Johnson LLP, Washington, D.C.

**Zack Leder**, Partner, Bennett Thrasher, LLP, Atlanta, GA

# ACCOUNTING, ERISA, ETHICS, ET CETERA

## WEDNESDAY MORNING, OCTOBER 24, 2018

Michael A. Laing, *Presiding*

7:30-8:30 Breakfast

8:30-9:30 **INTERNATIONAL TAX REFORM TOPICS THAT WE ALL NEED TO UNDERSTAND** — After TCJA, it's literally a new world in international taxation. What was expected to be a simplified environment for international tax planners has become just the opposite—a world of increased complexity requiring analysis of many more varied facts and circumstances. This session covers the most important aspects of the new rules, including the transition tax for deferred foreign income, the changes to subpart F, the Global Intangible Low Taxed Income ("GILTI") rules, the Base Erosion and Anti-Abuse Tax ("BEAT"), the changes to the earnings stripping rules, and many others.

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

9:30-10:45 **NEW § 83(i) AND OTHER TAX ASPECTS OF PRIVATE EQUITY COMPENSATION** — In addition to all the other changes enacted by TCJA, modifications were made to the familiar rules under § 83. These modifications will affect how private equity compensation is structured. This session covers the taxation of equity compensation structures, including stock options; restricted stock; phantom stock; stock appreciation rights; fee waivers; carried interest waivers; and partnership profit interests, with a focus on the interplay with new § 83(i).

**Gregg D. Polsky**, Francis Shackelford Distinguished Professor in Taxation Law, University of Georgia School of Law, Athens, GA

10:45-11:00 Break

11:00-12:00 **TAX ACCOUNTING AND COST RECOVERY UPDATE** — As in other areas, TCJA has made significant changes in tax accounting and cost recovery rules. Expensing will be available for numerous classes of assets through 2023, although questions exist with respect to the scope of the expensing provisions. In many situations, new § 451(b) will accelerate income inclusion by reference to "applicable financial statements" under financial accounting standards. In addition, the availability of exemptions for small businesses with respect to the use of cash method accounting has expanded, along with exemption from UNICAP and qualification for the completed contract method. These various changes and additions to the rules will be discussed.

**George A. Hani**, Member, Miller & Chevalier Chartered, Washington, D.C.

12:15-1:05 **Mid-Day Program: A YEAR INTO TAX REFORM, HOW HAS THE LANDSCAPE CHANGED FOR TAX CREDIT INVESTMENTS?** — This presentation will cover a number of new considerations in evaluating federal and state tax credit investments created by the 2017 federal tax law changes. Learn from a veteran tax expert — the Managing Director of Tax Credit Investments for the most diversified tax credit investment provider — how the changes in tax reform have impacted federal and state ITCs. The presenter will discuss changes as it relates to rates, depreciation, and interest expense limitations. Changes to the ITCs, namely historic and solar also will be discussed. Sponsored by **Monarch Private Capital** and presented by **George L. Strobel II**

## WEDNESDAY AFTERNOON, OCTOBER 24, 2018

Pamela F. Olson, *Presiding*

1:15-2:15 **READING BODY LANGUAGE TO EVALUATE TRUTHFULNESS** — Professionalism requires candor which, in turn, requires that you know whether you have been misled. Ever wonder whether and when your opposition, a witness, or even your client is not being truthful? Develop an eye for truthfulness by learning the telltale signs from the body language expert.

**Susan Constantine**, MPsy, Principal, The Human Behavior Lab, LLC, Apopka, FL

*Submitted for 1.0 hour of professionalism credit.*

2:15-3:15 **NEGOTIATING IN APPEALS WITH EXAM PRESENT** — The structure of Appeals has moved from opposing face-to-face conferences to inviting Exam to sit in on negotiations. Learn the best approach for handling this new obstacle and reaching the best result, in both an LB&I and SBSE context, from the most effective ADR office in the country.

**Brian W. Kittle**, Partner, Mayer Brown, New York, NY

3:15-3:30 Break

3:30-4:30 **INTERNATIONAL TAX VIOLATIONS AND RISING IRS ENFORCEMENT: SUCCESSFULLY DEFENDING TAXPAYERS IN GLOBAL DISPUTES** — Despite budget constraints and key vacancies, the IRS continues to target international issues and assert large penalties. The IRS is focused on FBAR violations, expanded foreign asset reporting duties, taxpayers who ceased participation in voluntary disclosure programs, implementation of multiple FATCA weapons, deprivation of passports for tax debtors, automatic penalties for late international information returns, compliance initiatives targeting foreign investors with U.S. rental property, and more. This presentation reviews the latest issues, penalties, cases, rulings, and defense strategies in the international arena.

**Hale E. Sheppard**, Shareholder, Chamberlain, Hrdlicka, White, Williams & Aughtry, Atlanta, GA

4:30-5:30 **THE ACCIDENTAL FELON: WHEN DOES RETURN PRESENTATION AND ADVOCACY BECOME A § 7212 CRIMINAL OBSTRUCTION OFFENSE?** — A pending § 7212 criminal obstruction case suggests that failing to maintain adequate records, structuring transactions and return presentation to reduce audit exposure, and resisting document requests may cross the fuzzy line between civil advocacy and criminal conduct. This expert panel explores this alarming new case to help tax advisors avoid the previously unimaginable—jail time!

**Ian M. Comisky**, Partner, Fox Rothschild LLP, Philadelphia, PA

**Elizabeth P. Askey**, Managing Director, Grant Thornton LLP, Washington, D.C.

*Submitted for 1.0 hour of ethics credit.*

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 three-day package combines the Recent Federal Income Tax Developments and other hot topic sessions on Monday, the Pass-Through, Real Estate, Corporate and Other Business Tax Topics sessions on Tuesday, and the Tax Accounting, Employee Benefits, International, Tax Controversy, and Ethics and Professionalism sessions on Wednesday. Specifically, this package includes presentations on Recent Developments, the 20% 199A Deduction, Employee vs Independent Contractor Determination, the State Response to the Limit on Deductions for State Taxes, Hot Partnership and Real Estate Topics, the New Loss Limitation Regime, Strategies with the New Partnership Audit Rules, New Limitations on Deducting Business Interest, Choice of Entity Post-TCJA, Mergers, Acquisitions and Reorganizations post-TCJA, Primer on Tax Due Diligence, International Tax Post-TCJA, Equity-Based Incentive Compensation, Effect of TCJA on Tax Accounting, Reading Body Language to Evaluate Truthfulness, Negotiations with IRS Appeals, Defending Taxpayers in Global Tax Disputes, and When Does Return Preparation Become Criminal Obstruction.

### WEDNESDAY THROUGH FRIDAY:

- ■ This three-day package combines the Estate, Gift and Generation-Skipping Planning sessions on Thursday and Friday with the Tax Accounting, Employee Benefits, International, Tax Controversy, and Ethics and Professionalism sessions on Wednesday. In particular, Wednesday includes presentations on International Tax Post-TCJA, Equity-Based Incentive Compensation, Effect of TCJA on Tax Accounting, Reading Body Language to Evaluate Truthfulness, Negotiations with IRS Appeals, Defending Taxpayers in Global Tax Disputes, and When Does Return Preparation Become Criminal Obstruction. The Estate Planning sessions on Thursday and Friday include presentations covering Recent Estate and Gift Planning Developments, Estate Planning and Administration Post-TCJA, Tax Planning for Real Estate Investors, the Attorney-Client Privilege in the Trust and Estate Context, Minimizing State Income Taxes on Nongrantor Trusts, Fiduciary Concerns in Decanting a Trust, Using Self-Settled Asset Protection Trusts for Tax Planning, the Effect of TCJA on Tax-Exempt Entities, Unwinding the Family LP or LLC, Innovative Pass-Through Structures and Techniques Post-TCJA, Increased Attractiveness of Nongrantor Trusts Post-TCJA, and Managing Required Minimum Distributions from IRAs and Other Retirement Plans.

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

**REGISTER ONLINE AT [WWW.SFTI.ORG](http://WWW.SFTI.ORG)**

# ESTATE PLANNING - DAY I

## THURSDAY MORNING, OCTOBER 25, 2018

Alan F. Rothschild, Jr., *Presiding*

7:00-8:00 Breakfast

8:00-9:00 **ESTATE PLANNING AND ADMINISTRATION AFTER TCJA** — TCJA contains several provisions of significance to professionals in the fields of estate planning and administration. Among the most notable are the “doubling” of the basic exclusion amount, the \$10,000 cap on the deduction for state and local taxes, the elimination of miscellaneous itemized deductions, and the up-to-20% deduction for qualified business income. This session examines the important details of these provisions and discusses various strategies to maximize available benefits and avoid or minimize detrimental results.

**Charles A. “Clary” Redd**, Partner, Stinson Leonard Street LLP, St. Louis, MO

9:00-10:00 **DISHING THE DIRT ON PLANNING FOR REAL ESTATE INVESTORS** — This program focuses on income tax and wealth transfer tax opportunities (and pitfalls) associated with planning for real estate investors, including valuation discounts; valuation freezes; and leveraging strategies for specific types of assets and ownership structures common in real estate deals. This program also examines the implications of TCJA and discusses practical considerations (tax and non-tax) for representing real estate investors, including, among other topics, choosing the right trustees after the *Aragona* case; dealing with negative capital accounts; and managing capital gains and avoiding “dealer” status.

**Farhad Aghdami**, Partner, Williams Mullen, Richmond, VA

10:00-10:15 Break

10:15-11:15 **SQUARING THE CIRCLE** — This expert panel provides a comprehensive examination of the history, recent statutory and case law developments, and contemporary challenges of applying the attorney-client privilege in the fiduciary realm.

**Dana G. Fitzsimons Jr.**, Principal, Bessemer Trust, Atlanta, GA

**Meghan G. Hubbard**, McGuireWoods LLP, Richmond, VA

*Submitted for 1.0 hour of ethics credit.*

11:15-12:00 **MINIMIZING OR ELIMINATING STATE INCOME TAXES ON NONGRANTOR TRUSTS** — This session explores the substantial state income tax savings that can be achieved through the careful selection of a trust’s fiduciary, place of administration, and other factors.

**Richard W. “Dick” Nenzo**, Senior Trust Counsel and Managing Director, Wilmington Trust Company, Wilmington, DE

12:15-1:05 **Mid-Day Program: VALUATION ISSUES ARISING FROM TAX REFORM** — This program will cover valuation issues that the firm has seen arise from Tax Reform and new planning techniques that the firm’s referral sources are using. The presenter will address different assets that are being valued in conjunction with new planning techniques, as well as other issues that have surfaced in the valuation community over the past year.

Sponsored by **MPI** and presented by **Todd Povlich**

## THURSDAY AFTERNOON, OCTOBER 25, 2018

Frank S. Macgill, *Presiding*

1:15-2:15 **DECANTING: A BALANCING ACT** — “Decanting” in the trust-law context refers to a trustee’s “pouring over” of trust assets from an existing trust to another trust, the terms of which may vary slightly or significantly as allowed by governing law. Having originated as a common-law concept in the early 1940s, decanting has now been codified in approximately half the states in the Union. While decanting provides practical flexibility to deal with difficult, inappropriate or ambiguous trust terms, its availability can also increase exposure to the fiduciary, which must consider carefully whether and how its fiduciary duty of impartiality among beneficiaries impacts its judgment as to the potential benefits of “improved” provisions. The various state statutes adopted to date vary significantly in the discretion afforded the fiduciary and, thus far, very few judicial decisions are available to guide the trustee or advisor.

**Cynthia G. Lamar-Hart**, Shareholder, Maynard Cooper & Gale, Birmingham, AL

2:15-3:15 **USING SELF-SETTLED ASSET PROTECTION TRUSTS FOR TAX PLANNING PURPOSES** — This program provides an overview of domestic self-settled asset protection trusts. The program also addresses why clients are interested in creating domestic self-settled asset protection trusts and how such trusts can be used to accomplish certain tax planning objectives. In particular, the program explains the proper use of completed gift asset protection trusts and DING (Delaware incomplete gift non-grantor) trusts.

**Michael Gordon**, Director, Gordon, Fournaris & Mammarella, P.A., Wilmington, DE

3:15-3:30 Break

3:30-4:30 **“TAX-EXEMPT” DOES NOT MEAN “NONTAXABLE,” ESPECIALLY AFTER TCJA** — The changes wrought by TCJA did not spare exempt organizations. In fact, there are new excise taxes, new exceptions, new charitable contribution rules, and important changes to the determination of unrelated business income. In addition, administrative developments, both friendly and unfriendly, over the past year also significantly affect exempt organizations. This presentation explains these changes and developments and offers practical planning tips.

**James K. Hasson, Jr.**, Principal, Hasson Law Group, LLP, Atlanta, GA

4:30-5:30 **FAMILY LPS AND LLCs: THE UNWIND** — This session will examine the income tax issues that may be overlooked in unwinding a family LP or LLC, particularly if the advisor’s expertise is more concentrated on estate planning than income taxation.

**Robert R. Pluth, Jr.**, Partner, Schiff Hardin LLP, Chicago, IL

5:30-7:00 **Cocktail Party**



# ESTATE PLANNING - DAY II

## FRIDAY MORNING, OCTOBER 26, 2018

Martha Louise R. Lewis, *Presiding*

7:00-8:00 Breakfast

8:00-9:15 **INNOVATIVE PASS-THROUGH STRUCTURES AND TECHNIQUES IN THE WAKE OF TCJA** — Tax reform (whether you call it the “Tax Cuts and Jobs Act” or the “Tax COVFEFE and Jibberish Act”) is here to stay. . . sort of. This presentation discusses the important opportunities and pitfalls that have been created for families (and family-owned businesses) with pass-through entities (partnerships, LLCs, and disregarded entities) from both an estate planning and income tax planning standpoint, with a focus on what will expire and what is “permanent.”

**Paul S. Lee**, Senior Vice President, The Northern Trust Company, New York, NY

9:15-10:30 **ARE NONGRANTOR TRUSTS THE CAT’S PAJAMAS AGAIN?** — For years we have been using grantor trusts that are disregarded as separate entities for income tax purposes to enhance gift planning. But after TCJA, have we entered a new era where nongrantor trusts suddenly are more attractive? For instance, do they offer advantages for state and local tax deductions or administrative expenses? Can we use them to maximize the new § 199A deduction by balancing distributions to the beneficiaries when the trust owns a pass-through business? Do ESBIs qualify for the new § 199A deduction and/or provide any new planning opportunities with the expanded charitable contribution deduction? Finally, when the love boat takes on water, who reports the income generated by the couple’s grantor trust? These and other timely questions about fiduciary income tax planning are answered by this session.

**Carol A. Cantrell**, Member, Cantrell & Cantrell, PLLC, Houston, TX

10:30-10:45 Break

10:45-12:00 **70 ½: HOW TO COMPUTE, TAKE, MINIMIZE AND/OR AVOID RMDs** — The baby boomers are reaching age 70 ½ at the rate of 10,000 per day. They need your help in dealing with “required minimum distributions” from their IRAs and other retirement plans. This presentation addresses how to do RMDs “right” and manage the tax impact.

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

12:15-1:05 **Mid-Day Program: To Be Announced**

## FRIDAY AFTERNOON, OCTOBER 26, 2018

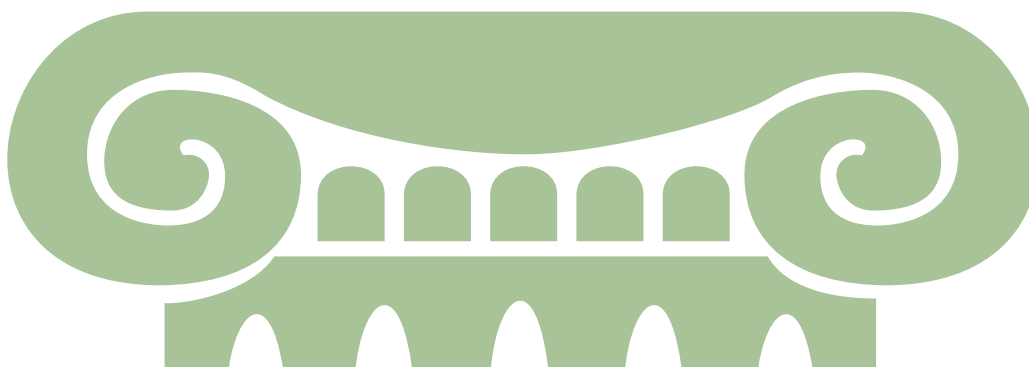
Tiffany A. Altizer, *Presiding*

1:15-2:30 **RECENT ESTATE AND GIFT PLANNING DEVELOPMENTS** — In an always lively and informative fashion, this session details significant court decisions, rulings, and statutory and regulatory developments relating to trust and wealth transfer taxes over the past twelve months.

**Samuel A. Donaldson**, Professor of Law, Georgia State University College of Law, Atlanta, GA

Adjourn

**EASY ONLINE REGISTRATION**  
**WWW.SFTI.ORG**



# IN & AROUND ATLANTA

## LOCATION AND HOTEL ACCOMMODATIONS

Conveniently located in the Buckhead district, the Grand Hyatt Atlanta in Buckhead is accessible to Atlanta's finest dining, shopping and nightlife for you and your colleagues. Moreover, the Grand Hyatt Atlanta 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. To provide a quality Institute at the best possible cost, SFTI has negotiated special room rates and has committed to a block of rooms at the Grand Hyatt Atlanta in Buckhead. Your support allows us to keep our registration fees reasonable. Single or double occupancy rooms are available at the SFTI group rate of \$249. To make your reservation, please call 1-888-421-1442 and identify yourself as attending the SFTI tax conference. You may also book online at [www.sfti.org](http://www.sfti.org); click on Travel Info, then Hotel Info. We urge you to make your hotel and travel plans early. Hotel rooms can sell out prior to the cut-off date. These rooms will be held as a block, unless exhausted, until September 28, 2018, at which time they will be released to the general public.

## 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.

## RESTAURANTS

- Antica Posta (Italian) • Aria (American Contemporary)
- Atlanta Fish Market (Seafood) • Atlas (New American)
- Bone's (Steakhouse) • Café Sunflower (Vegetarian/Gluten Free)
- The Capital Grille (Steakhouse) • King & Duke (New American)
- Restaurant Eugene (American Contemporary)
- South City Kitchen (Southern)

## ATTRACTIONS

Buckhead has a variety of attractions including the Atlanta History Center and the Georgia Governor's Mansion. Other Atlanta attractions include the new Mercedes-Benz Stadium (home of the 2019 Super Bowl), Center for Civil and Human Rights, the College Football Hall of Fame & Fan Experience, Georgia Aquarium, World of Coca-Cola, Inside CNN Studio Tour or the Skyview Ferris Wheel. All are minutes away and easily accessible by Marta. *Advance online tickets are recommended for all attractions.*



Photo courtesy of Mercedes-Benz Stadium

## 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. Or venture a few blocks away to the Shops of Buckhead Atlanta.

# SPONSORS

SFTI acknowledges the generous support of the following sponsors for their involvement in this year's Institute.

## PLATINUM

**DIVERSIFIED TRUST**

COMPREHENSIVE WEALTH MANAGEMENT

## MID-DAY

 **Chamberlain Hrdlicka**  
Attorneys at Law

  
**MONARCH**  
PRIVATE CAPITAL

 **mpi** Business Valuation  
& Advisory

## SPEAKER/TRUSTEE DINNER

**BROWN**   
**BROTHERS**  
**HARRIMAN**

## PARTNER

  
**BALENTINE™**  
THE ART & SCIENCE OF INVESTING

 **BENNETT  
THRASHER** LLP

  
**BESSEMER**  
TRUST

  
**BNY MELLON**  
WEALTH MANAGEMENT

 **CENSEO**  
ADVISORS

  
**GENSPRING™**  
SUNTRUST PRIVATE WEALTH

 **HAYNSWORTH  
SINKLER BOYD**

 **HunterMaclean**  
ATTORNEYS

  
**Keith Altizer and Company, P.A.**  
Certified Public Accountants

 **KPMG**

**KING & SPALDING**

 **LBMC** MAKE A GOOD  
BUSINESS BETTER

  
**THE MOREHEAD GROUP**  
Established 1941

 **mcguire sponasel**

**Moore&VanAllen**

**NLEC** NEASE, LAGANA  
EDEN & CULLEY

 **RAMAGE LEWIS** L.L.C.  
CERTIFIED PUBLIC ACCOUNTANTS

**SOJOURNER  
CAUGHMAN  
& THOMAS**

**Taft/**

## CONTRIBUTOR

 **Wealth  
Management.com**  
The digital resource of **REP.** and **TRUSTS**  
ESTATES

  
**Willamette  
Management  
Associates**

 **WOMBLE  
BOND  
DICKINSON**

**Hogan  
Lovells**

# FOR YOUR INFORMATION

REGISTER ONLINE AT: [WWW.SFTI.ORG](http://WWW.SFTI.ORG)

## REGISTRATION

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

Two-day registration is \$695 (received by August 20, 2018); \$745 (received by October 1, 2018); \$825 (received after October 1, 2018). Three-day registration (first three days or last three days) is \$795 (received by August 20, 2018); \$845 (received by October 1, 2018); \$925 (received after October 1, 2018). Five-day registration is \$995 (received by August 20, 2018); \$1,045 (received by October 1, 2018); \$1,125 (received after October 1, 2018). A **50%** discount is available to first time attendees and/or IRS employees. 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. A **25%** discount is available for second time attendees who attended in 2017 as a first time attendee. A special code will be sent via email to those eligible. **Discounts may not be combined.**

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 upon the availability of space and materials. All events are scheduled at the Grand Hyatt Atlanta in Buckhead. Discounted room rates are only available if you reserve on or before September 28, 2018 at the Grand Hyatt Atlanta in Buckhead.

## CONFERENCE MATERIALS

Every registrant will receive a USB flash 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 email in advance of the program with a link and password in order to access and to download and/or print the course materials. Free wifi also will be available for attendees at the Institute. There will be power strips at many of the tables so that registrants can use their computers for the duration of the conference. Printers will not be available.

## SFTI IS GOING GREEN

**Bound hard copies of the course materials will be available only upon advance request at an additional fee of \$35 per book. There are two books available. Volume 1 includes Monday, Tuesday and Wednesday materials; Volume 2 includes Thursday and Friday materials.** If you wish to have printed materials available for pick-up at the SFTI book desk, please indicate this when registering and submit the additional fee of \$35/book.

## SPECIAL NEEDS

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 emailed to [info@sfti.org](mailto:info@sfti.org) at least 14 days in advance of the commencement of the meeting.

## BADGES

Attendees will be issued a name badge upon arrival that is required for admission to all events. Proper photo identification may be required.

## BREAKFAST

A complimentary continental breakfast will be provided each morning at the time indicated on the daily schedule. Food and beverages are 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. Gluten free and vegetarian options will be available. Please indicate your preference on each day's sign up sheet.

## CANCELLATION/SUBSTITUTION POLICY

A written request for cancellation must be emailed to [info@sfti.org](mailto:info@sfti.org) to the attention of: Conference Administration. If your request is received by October 8, you will receive a 100% refund **less a \$75 cancellation fee**. Due to financial obligations incurred by SFTI, there are no refunds available during the two weeks prior to the Institute. We are not able to arrange cancellation exceptions or to accept onsite cancellations. If you are unable to attend the Institute but would like to send someone in your place, please send written notification by email to [info@sfti.org](mailto:info@sfti.org) no later than October 15.

## FUTURE INSTITUTES

Fifty-Fourth Annual Institute, October 21-25, 2019

Fifty-Fifth Annual Institute, October 26-30, 2020

## AIRLINES

SFTI has arranged for discounted travel on Delta Airlines. Use your own travel agent or call the airline directly. Delta Airlines (800) 328-1111 (Code NMS4E) or go to [www.delta.com](http://www.delta.com).

## CAR RENTAL

SFTI has arranged for discounted car rental rates with AVIS. To receive a special discount call 1-800-331-1600 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 advance 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; and 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 submitted to the National Registry of CPE Sponsors through its website: [www.nasbaregistry.org](http://www.nasbaregistry.org).

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

The Institute strives to present programs that will meet most state continuing education requirements for attorneys and CPAs, and will continue to submit all of its offerings for approval by the various states' legal and accounting boards. The Institute seeks to offer programs that will allow registrants to satisfy their obligation to receive continuing education credit in the areas of ethics and professionalism. However, each state licensing organization has specific requirements for these programs, and some organizations will not allow a single program to simultaneously qualify for ethics and professionalism credit. The Institute cannot guarantee that the programs it designates as addressing ethics and professionalism will be credited by all continuing education certifying organizations. SFTI NASBA fields of study include tax and ethics.

The 2018 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 2018 program will also be submitted for CFP approval. Various forms required by each state will be available at the registration desk.

## TOTAL COURSE HOURS\*

■ ■ ■  
34.50 (60-minute hours)  
41.00 (50-minute hours)  
2.00 hours ethics  
1.00 hour professionalism

## COURSE HOURS FOR MONDAY - WEDNESDAY\*

■ ■  
21.75 (60-minute hours)  
26.00 (50-minute hours)  
1.00 hour ethics  
1.00 hour professionalism

## COURSE HOURS FOR WEDNESDAY - FRIDAY\*

■ ■  
20.00 (60-minute hours)  
24.00 (50-minute hours)  
2.00 hours ethics  
1.00 hour professionalism

## COURSE HOURS FOR THURSDAY AND FRIDAY\*

■  
12.75 (60-minute hours)  
15.00 (50-minute hours)  
1.00 hour ethics

\* Not including Mid-day presentations.

**REGISTER ONLINE AT  
WWW.SFTI.ORG**

# SCHEDULE AT A GLANCE

## MONDAY, OCTOBER 22

**8:00-9:00**

Breakfast

**9:00-10:30**

RECENT FEDERAL INCOME TAX DEVELOPMENTS

**10:30-10:45**

Break

**10:45-12:00**

RECENT FEDERAL INCOME TAX DEVELOPMENTS (Cont'd)

**12:15-1:05**

Mid-day Program:

WHAT EVERY FAMILY BUSINESS AND FAMILY OFFICE NEED TO KNOW

Sponsored by CHAMBERLAIN, HRDLICKA, WHITE, WILLIAMS & AUGHTRY and presented by Alan J. Zachariah, John W. Hackney and David D. Aughtry

**1:15-2:45**

FOR SELECT TAXPAYERS ONLY: 20% OFF UNTIL 2026! NEW IRC § 199A AND "QUALIFIED BUSINESS INCOME"

**2:45-4:00**

THE EMPLOYEE VS. INDEPENDENT CONTRACTOR DETERMINATION — MORE IMPORTANT THAN EVER

**4:00-4:15**

Break

**4:15-5:30**

STATE TAX UPDATE, WITH A FOCUS ON THE IMPLICATIONS OF TCJA

**5:30-7:00**

Cocktail Party

## TUESDAY, OCTOBER 23

**7:00-8:00**

Breakfast

**8:00-9:15**

HOT TAX REFORM TOPICS AFFECTING PARTNERSHIPS AND REAL ESTATE

**9:15-10:15**

MAKING SENSE OF THE EVER-EXPANDING LOSS LIMITATION REGIMES

**10:15-10:30**

Break

**10:30-11:15**

IT'S 2018 AND THE NEW PARTNERSHIP AUDIT REGIME IS A HARSH REALITY — NOW WHAT?

**11:15-12:00**

MORE TCJA SURPRISES PART I: NEW LIMITATIONS ON DEDUCTING BUSINESS INTEREST FOR PARTNERSHIPS AND REAL ESTATE

**12:15-1:05**

Mid-day Program: TO BE ANNOUNCED

**1:15-2:00**

MORE TCJA SURPRISES PART II: NEW LIMITATIONS ON DEDUCTING BUSINESS INTEREST FOR CORPORATIONS

**2:00-3:15**

BACK TO THE FUTURE FOR C CORPORATIONS? EXAMINING THE CHOICE OF ENTITY ANALYSIS AFTER TCJA

**3:15-3:30**

Break

**3:30-4:30**

MERGERS, ACQUISITIONS, AND OTHER CORPORATE REORGANIZATIONS AFTER TAX REFORM

**4:30-5:30**

DUE DILIGENCE FOR TARGET S CORPORATIONS AND C CORPORATIONS

## WEDNESDAY, OCTOBER 24

**7:30-8:30**

Breakfast

**8:30-9:30**

INTERNATIONAL TAX REFORM TOPICS THAT WE ALL NEED TO UNDERSTAND

**9:30-10:45**

NEW § 83(i) AND OTHER TAX ASPECTS OF PRIVATE EQUITY COMPENSATION

**10:45-11:00**

Break

**11:00-12:00**

TAX ACCOUNTING AND COST RECOVERY UPDATE

**12:15-1:05**

Mid-day Program:

A YEAR INTO TAX REFORM, HOW HAS THE LANDSCAPE CHANGED FOR TAX CREDIT INVESTMENTS? Sponsored by MONARCH PRIVATE CAPITAL and presented by George L. Strobel II

**1:15-2:15**

READING BODY LANGUAGE TO EVALUATE TRUTHFULNESS

**2:15-3:15**

NEGOTIATING IN APPEALS WITH EXAM PRESENT

**3:15-3:30**

Break

**3:30-4:30**

INTERNATIONAL TAX VIOLATIONS AND RISING IRS ENFORCEMENT: SUCCESSFULLY DEFENDING TAXPAYERS IN GLOBAL DISPUTES

**4:30-5:30**

THE ACCIDENTAL FELON: WHEN DOES RETURN PRESENTATION AND ADVOCACY BECOME A § 7212 CRIMINAL OBSTRUCTION OFFENSE?

**5:30-6:30**

Exhibitor's Cocktail Hour

## THURSDAY, OCTOBER 25

**7:00-8:00**

Breakfast

**8:00-9:00**

ESTATE PLANNING AND ADMINISTRATION AFTER TCJA

**9:00-10:00**

DISHING THE DIRT ON PLANNING FOR REAL ESTATE INVESTORS

**10:00-10:15**

Break

**10:15-11:15**

SQUARING THE CIRCLE

**11:15-12:00**

MINIMIZING OR ELIMINATING STATE INCOME TAXES ON NONGRANTOR TRUSTS

**12:15-1:05**

Mid-day Program:

VALUATION ISSUES ARISING FROM TAX REFORM Sponsored by MPI and presented by Todd Povlich

**1:15-2:15**

DECANTING: A BALANCING ACT

**2:15-3:15**

USING SELF-SETTLED ASSET PROTECTION TRUSTS FOR TAX PLANNING PURPOSES

**3:15-3:30**

Break

**3:30-4:30**

"TAX-EXEMPT" DOES NOT MEAN "NONTAXABLE," ESPECIALLY AFTER TCJA

**4:30-5:30**

FAMILY LPS AND LLCs: THE UNWIND

**5:30-7:00**

Cocktail Party

## FRIDAY, OCTOBER 26

**7:00-8:00**

Breakfast

**8:00-9:15**

INNOVATIVE PASS-THROUGH STRUCTURES AND TECHNIQUES IN THE WAKE OF TCJA

**9:15-10:30**

ARE NONGRANTOR TRUSTS THE CAT'S PAJAMAS AGAIN?

**10:30-10:45**

Break

**10:45-12:00**

70 ½: HOW TO COMPUTE, TAKE, MINIMIZE AND/OR AVOID RMDs

**12:15-1:05**

Mid-day Program: TO BE ANNOUNCED

**1:15-2:30**

RECENT ESTATE AND GIFT PLANNING DEVELOPMENTS

**2:30**

Adjourn

# REGISTRATION FORM

**NEW ATTENDEES receive 50% off the registration fee****October 22-26, 2018****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 ( ) \_\_\_\_\_ Email \* \_\_\_\_\_ (\* Email is required - registration confirmations are sent via email.)

**Registration fees include:** conference sessions, continental breakfasts, refreshment breaks, Monday, Wednesday & Thursday evening cocktail parties and one set of course materials on a USB flash drive.

**REGISTRATION FEES**

		<b>EARLY:</b> Received by 8/20/18	<b>STANDARD:</b> Received by 10/1/18	<b>LATE:</b> Received after 10/1/18
♦TWO-DAY REGISTRATION – ESTATE PLANNING TOPICS	10/25-10/26 (Thurs & Fri)	\$695	\$745	\$825
♦THREE-DAY REGISTRATION – GENERAL SESSIONS & ETHICS	10/22-10/24 (Mon, Tues, Wed)	\$795	\$845	\$925
♦THREE-DAY REGISTRATION – ETHICS & ESTATE PLANNING	10/24-10/26 (Wed, Thurs, Fri)	\$795	\$845	\$925
♦FIVE-DAY REGISTRATION – ALL SESSIONS	10/22-10/26 (Mon - Fri)	\$995	\$1,045	\$1,125

**PRINTED COURSE MATERIALS:** Extra Option for an Additional Fee: SFTI is going green! Printed materials are not included with your registration, but are available for an additional \$35 per book. Volume 1 (contains Mon-Wed materials) and Volume 2 (contains Thurs-Fri materials) will be available at check-in upon advance purchase. Please include an additional \$35 per book in your total amount due if you wish to have printed materials at SFTI. **Please check here if you would like bound hardcopies for an additional \$35/per book:** ☐ Volume 1 ☐ Volume 2

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

**DISCOUNTS**

\*50% Discount for First Time Attendees. \*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). A 25% discount is available to second time attendees who attended in 2017 as a first time attendee. A special code will be sent via email to those eligible individuals. **Discounts may not be combined.**

How did you learn about SFTI: ☐ Word of Mouth ☐ Brochure Mailing ☐ Email ☐ Other (Please List) \_\_\_\_\_

Do you plan to attend the cocktail party Monday evening? ☐ Yes ☐ No Do you plan to attend the cocktail party Thursday evening? ☐ 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 \_\_\_\_\_  
 Billing Address \_\_\_\_\_ Security Code \_\_\_\_\_  
 Name of Cardholder \_\_\_\_\_ Signature \_\_\_\_\_

**Cancellation Policy:** Registrants who are unable to attend the Institute will receive a full refund (less a \$75 administrative fee) if an emailed cancellation request is received on or before October 8, 2018. SFTI will accept substitutions if written notification is sent to info@sfti.org by October 15, 2018. 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 registrant. This form may be photocopied. To avoid duplicate charges, DO NOT MAIL original registration form if you have already registered online.** Southern Federal Tax Institute, Inc. • 2107 North Decatur Road • PMB 521 • Decatur, GA 30033 • 770.640.8300

**Mail or fax the hotel reservation form directly to:** Reservations Department, Grand Hyatt Atlanta in Buckhead, 3300 Peachtree Road NE, Atlanta, Georgia 30305 or call (888) 421-1442; FAX (404) 364-3887.  
**For discounted rates, reservations must be received by September 28, 2018 and before the reserved block of rooms is filled.**

**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 is 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 16% 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 3 PM 48 hours prior to arrival. An early departure fee of one night's room and tax 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 16%, subject to change plus \$5 per night Georgia hotel/motel fee. If unable to present a credit card at check-in, cash deposit is requested.

**Guest Room Information:** No. of Rooms: \_\_\_\_\_ Single (1 person) @ \$249 \_\_\_\_\_ Double (2 persons) @ \$249 (including unlimited internet access)

Bed Type: ☐ King ☐ 2 Doubles ☐ Smoking, Additional persons: \$25. Children under 18 are 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.



**SOUTHERN FEDERAL  
TAX INSTITUTE**

2107 NORTH DECATUR ROAD  
PMB 521  
DECATUR, GA 30033

770.640.8300 PHONE

**WWW.SFTI.ORG**

NON-PROFIT ORG.  
U.S. POSTAGE  
**PAID**  
Permit No. 2276  
Atlanta, GA

# JOIN US!

## October 22-26, 2018

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



53<sup>RD</sup> <sup>THE</sup> ANNUAL

**SOUTHERN FEDERAL  
TAX INSTITUTE**

### **NOW OFFERING 2, 3, OR 5-DAY SESSIONS**

tax attorneys • accountants • financial planners • estate planners • life underwriters



**ALL SESSIONS**  
MONDAY - FRIDAY



**GENERAL SESSIONS  
& ETHICS**  
MONDAY - WEDNESDAY



**ETHICS &  
ESTATE PLANNING**  
WEDNESDAY - FRIDAY



**ESTATE PLANNING  
TOPICS**  
THURSDAY - FRIDAY