



THE STATE BAR OF CALIFORNIA TAXATION SECTION PRESENTS

Earn 7.5 Hours
MCLE Credit & Taxation
Law Legal Specialization
Including 1 Hour of Ethics



THE 2015 ANNUAL INCOME TAX SEMINAR

Co-sponsored by: California Society of Certified Public Accountants
and California Association of Attorney-Certified Public Accountants

Earn 9 hours of CPE for CPAs; 9 hours of continuing education credit for enrolled agents

THURSDAY, JUNE 25, 2015
University of San Diego
School of Law
5998 Alcalá Park
Room LRC-132
San Diego, CA

FRIDAY, JUNE 26, 2015
Whittier Law School
3333 Harbor Boulevard
Room 12
Costa Mesa, CA

FRIDAY, JUNE 26, 2015
Golden Gate University
School of Law
536 Mission Street
Rooms 2201-2202
San Francisco, CA

Register Online: <http://taxation.calbar.ca.gov/>

PROGRAM SCHEDULE

- 8:00 am **Registration and Continental Breakfast**
- 8:30 am **Opening Remarks**
- 8:35 – 10:05 am **OVDP/FATCA Update: The Nuts and Bolts of Streamlined Filing and Proving Non-Willfulness**
- Speakers:** Eric D. Swenson, Patrick W. Martin, Jon P. Schimmer, *Procopio, Cory, Hargreaves & Savitch LLP (SD)*
David Rice, *Law Offices of David Lee Rice, APC*; Gary Howard, *G.L. Howard & Company CPAs, LLP (CM)*
Steven L. Walker, *Law Offices of Steven L. Walker*; Betty J. Williams, *Law Office of Williams & Associates, LLP (SF)*
- The IRS' offshore streamlined compliance procedures have been expanded and modified to accommodate a broader group of U.S. taxpayers. But do all taxpayers qualify for the streamlined process? How do you make this determination and what due diligence needs to be performed on your part to determine whether a taxpayer is eligible for the program? Part one of this program will provide an overview of the streamlined procedural requirements, determination of residency under IRC section 911 and the regulations thereunder, an update on new procedures under the 2014 OVDP and the applicable penalties including the 50% penalty which may be triggered. Part two of the program will address how to best assess whether a taxpayer's conduct was not willful, the risks involved in handling streamlined cases, issues to watch out for and traps for the unwary. The program is designed to be practical and provide you with skills that you can take back to your office and implement with your clients.
- 10:10 – 11:40 am **Discharging Taxes in Bankruptcy**
- Speakers:** A. Lavar Taylor, *Law Offices of A. Lavar Taylor*; Haleh Naimi, *Advocate Solutions, Inc. (SD & CM)*
Melody Scullary, *Franchise Tax Board*; Victoria C. Geary, *Board of Equalization*; Kathryn A. Meyer, *Internal Revenue Service (SF)*
- Experts from the private sector, Internal Revenue Service, Franchise Tax Board, and the Board of Equalization will discuss the challenges facing taxpayers and the government with respect to dischargeability of taxes in bankruptcy under chapters 7, 11, and 13. The panelists will review, among other issues, IRC section 507 priority rule requirements, taxes that are non-dischargeable under IRC section 523, and the treatment of fraudulent or unfiled returns.
- 11:45 am – 12:15 pm **Lunch**
- 12:20 – 1:50 pm **Ethics: Ethical Issues in Tax Practice and Procedure**
- Speakers:** Elizabeth Van Clief, *Hughes & Pizzuto, APC*; Brian M. Katusian, *Seltzer Caplan McMahon Vitek (SD)*
Michael B. Lang, *Chapman University Fowler School of Law*;
Jonathan T. Amitrano, *Law Offices of A. Lavar Taylor (CM)*
Carolyn Lee, *Abkin Law LLP*; Jeff Titus, *Law Offices of Jeffrey A. Titus (SF)*
- All tax practitioners must be on high alert to consistently conduct an ethical practice. It can be exhausting and emotionally draining. Fortunately, there likely is a rule to help you address the particular and peculiar facts and circumstances your clients present. Your actions and advice are governed by the California Rules of Professional Conduct, IRS Circular 230, AICPA Code of Professional Conduct, and the ABA Model Rules if you practice in Tax Court. This program will discuss some of the more pervasive and perplexing ethical issues you face, within the context of the ethical rules.
- 1:55 – 3:25 pm **Passive Activity Losses**
- Speakers:** Laura L. Buckley, *Higgs, Fletcher & Mack LLP*; Brad A. Gastineau, *Gatto, Pope & Walwick LLP (SD)*
Boyd Hudson, *Adams, Hawekotte & Hudson (CM)*
Cameron Hess, *Wagner Kirkman Blaine Klomprens and Youmans*; Robert C. Schmitt, *CPA (SF)*
- This advanced program integrates Section 469 tax-reduction strategies for real estate professionals and choice of entity strategies in connection with income, self-employment, and the 3.8% net investment income tax. This program focuses on the term "limited partner" concept as to LLCs, and the aggregation election. Also included are the latest developments by IRS, Congress and the courts.
- 3:30 – 5:00 pm **Income Tax Update 2015**
- Speakers:** Jared P. Werner, Mike C. Friedman, Mark C. Morris, *LevitZacks (SD)*
Stuart Simon, *Buchalter Nemer, APC*; Lisa O. Nelson, *Law Offices of A. Lavar Taylor (CM)*
Debra Petersen, *Petersen Law (SF)*
- The presentation will focus on federal income tax developments in the past year that impact individual taxpayers and closely-held businesses. The first area to be reviewed will be federal tax legislation enacted during the past year. Next, proposed legislation and the tax reform will be discussed. The final part of the presentation will review the important cases, rulings, notices, and regulations, including areas that the IRS has targeted for audit and litigation.

REGISTRATION FORM

THE 2015 ANNUAL INCOME TAX SEMINAR

June 25, 2015 • San Diego / June 26 • Costa Mesa / June 26 • San Francisco

Note: One registrant per form. Photocopies may be used.

- San Diego, June 25, 2015
- Costa Mesa, June 26, 2015
- San Francisco, June 26, 2015

Bar #: _____

Name: _____

Firm: _____

Address: _____

City, State, _____ Zip: _____

Phone: _____ Fax: _____

E-mail Address: _____
(required for email confirmation)

Check here if you do not want your information released.

Program package includes 7.5 hours of MCLE credit, program materials, continental breakfast, and lunch.

Pre-Registration Fees (check the appropriate circle)**

- \$135 Taxation Section Members or CalCPA
- \$170 Non-Taxation Section Members or Non-CalCPA
- \$75 Current Law Students
- \$60 Written Materials ONLY (includes shipping and handling)

***Onsite registration fee is \$170 for everyone (if space is available), please register in advance.*

Amount Enclosed/To Be Charged **Total** \$ _____

Credit Card Information (VISA/MASTERCARD Only)

I authorize The State Bar of California to charge my program registration to my VISA/MasterCard account. **(No other credit card will be accepted.)**

Account Number: _____ Exp. Date: _____

Cardholder's Name: _____

Cardholder's Signature: _____

Deadline: In order to pre-register, your form and check, payable to The State Bar of California, or credit card information, must be received by Thursday, June 18, 2015.

Register Online: <http://taxation.calbar.ca.gov/>

Mail To: Program Registrations, The State Bar of California, 180 Howard Street, San Francisco, CA 94105.

Fax To: Program Registration at 415-538-2368. In order to fax your registration, credit card information is MANDATORY. **(Photocopies of checks will NOT be accepted.)**

REGISTRATION INFORMATION

CANCELLATIONS/REFUND POLICY:

Cancellations and requests for refunds must be received in writing no later than Thursday, June 18, 2015 and are subject to a \$25 service charge. Refunds will not be available after Thursday, June 18, 2015.

QUESTIONS:

For registration information call (415) 538-2508. Telephone registrations will not be accepted. For program content and/or Section information call (415) 538-2580.

SPECIAL ASSISTANCE:

For special assistance, please call (415) 538-2580.

ON-SITE:

On-site registration will be on a space available basis. Call to confirm space availability.



The State Bar of California and the Taxation Section
are approved MCLE provider.

Register Online: <http://taxation.calbar.ca.gov/>