THE STATE BAR OF CALIFORNIA
TAXATION SECTION PRESENTS

Earn up to 15.5 Hours of MCLE Credit and Taxation Law Legal Specialization. Includes Legal Ethics.

THE TWENTY-FOURTH ANNUAL

Estate & Gift Tax Conference

FEBRUARY 25-26, 2016

University of San Francisco
School of Law, LL.M. Tax Program

101 Howard Street, Room 150
San Francisco, CA 94105

Join us for the first-ever 2-day Estate and Gift Tax Conference! Enjoy a discount for two full days of programming, or join us for a single day of your choice!

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

SPONSORS

THE TAXATION SECTION WOULD LIKE TO THANK ITS SPONSORS FOR THEIR GENEROUS CONTRIBUTIONS:

BNY MELLON
WEALTH MANAGEMENT

Withers Bergman LLP

WKBK&Y
Wagner Kirkman Blaine
Klomparens & Youmans LLP
Attorneys at Law

SCHEDULE AT A GLANCE

THURSDAY, FEBRUARY 25, 2016

7:30am - 4:45pm

Registration and MCLE Sign-In

7:30am - 8:15am

Continental Breakfast

8:15am - 9:15am—Session 1

Honey–I Forgot About the Income tax
Specialty Credit:
Tax: Individual Income Tax; Corporate Income Tax; Partnership Income Tax; Real Estate Income Tax; California Taxes; Estate, Gift Tax and Estate Planning
Trust & Estates: Estate Planning
Speakers: Belan Wagner
Minna Yang

9:20am - 10:20am—Session 2

The Sale IS Over–Now What Do I Do
Specialty Credit:
Tax: Individual Income Tax; Partnership Income Tax; Real Estate Income Tax; California Taxes; Estate, Gift Tax and Estate Planning
Trust & Estates: Estate Planning
Speaker: Jeffrey Stephens

10:20am - 10:35am

Break

10:35am - 11:35am—Session 3

Death Bytes: Planning and Administering the Digital Estate
Specialty Credit:
Tax: Estate, Gift Tax and Estate Planning
Trust & Estates: Estate Planning
Speakers: Julie Miraglia Kwon
John T. Rogers, Jr.

11:35am - 11:50am

Break

11:50am - 12:50pm—Session 4

A Discussion on the Ever Changing Practice of Law
Specialty Credit:
Ethics
Tax: Estate, Gift Tax and Estate Planning; Ethics of Tax Practice
Trust & Estates: Estate Planning
Speaker: Phil Feldman

12:55pm - 2:25pm—Session 5

The Win Win of Charitable Planning
Specialty Credit:
Tax: Individual Income Tax; Estate, Gift Tax and Estate Planning; Tax Exemption Organization
Trust & Estates: Estate Planning
Speakers: Rebecca O'Toole
Andrea Ross
Vimala Snow

2:25pm - 2:40pm

Break

2:40pm - 3:55pm—Session 6

The Nature and Effectiveness of Domestic Asset Protection Trusts
Specialty Credit:
Ethics
Tax: Individual Income Tax; California Taxes; Estate, Gift Tax and Estate Planning; Ethics of Tax Practice
Trust & Estates: Estate Planning
Speakers: Judge Peter Bowie
George D. Karibjanian
Sonia Woodruff

4:00pm - 5:00pm—Session 7

Planning for Nonresident Aliens and Their US Families
Specialty Credit:
Tax: Individual Income Tax; Estate, Gift Tax and Estate Planning; International Tax
Trust & Estates: Estate Planning
Speakers: William Finestone
Susan Witkin

FRIDAY, FEBRUARY 26, 2016

7:30am - 4:45pm

Registration and MCLE Sign-In

7:30am - 8:20am

Continental Breakfast

8:20am - 10:35am—Session 8

A Fireside Chat with District Counsel, Audit and the Former Estate and Gift Tax Branch Chief
Specialty Credit:
Tax: Estate, Gift Tax and Estate Planning; Current Developments
Trust & Estates: Estate Planning; Estate and gift tax return preparation and audit
Speakers: Donna Herbert, IRS Senior District Counsel
James F. Hogan
Robin Klomparens
Kyle Martin

10:35am - 10:50am

Break

10:50am - 11:50am—Session 9

Those Gnarly U.S. Estate Tax Reporting Rules Applicable to Foreigners–What You Need to Know
Specialty Credit:
Tax: Individual Income Tax; Corporate Income Tax; Partnership Income Tax; Real Estate Income Tax; Estate, Gift Tax and Estate Planning; International Tax
Trust & Estates: Estate Planning
Speaker: Wayne Johnson

11:50am - 12:05pm

Break

12:05pm - 12:50pm—Session 10

Keeping Your Client Safe from Predators–How to Deal with Diminishing Capacity and Related Ethical Issues
Specialty Credit:
Ethics
Tax: Estate, Gift Tax and Estate Planning; Ethics of Tax Practice
Trust & Estates: Incompetency planning and administrative procedure; Estate Planning
Speakers: Dr. Miko Davis
Carolyn Rosenblatt

12:55pm - 2:25pm—Session 11

What Every Practitioner Needs to Know to Stay on Top of Current Trends and Developments Affecting Advisors and Their Clients
Specialty Credit:
Tax: Estate, Gift Tax and Estate Planning; Current Developments
Trust & Estates: Estate Planning; Estate and gift tax return preparation and audit
Speaker: Andrew Katzenstein

2:25pm - 2:40pm

Break

2:40pm - 3:40pm—Session 12

Major Mistakes Made by Multi-Millionaire Millennials: Planning for the Rising Generation
Specialty Credit:
Tax: Estate, Gift Tax and Estate Planning; Tax Exemption Organization; Current Developments
Trust & Estates: Estate Planning
Speaker: Justin Miller

3:45pm - 5:00pm—Session 13

Keeping It in the Family: Business Succession Planning for the Family Business
Specialty Credit:
Tax: Individual Income Tax; Corporate Income Tax; Partnership Income Tax; Compensation and Benefits Tax; California Taxes; Estate, Gift Tax and Estate Planning
Trust & Estates: Estate Planning
Speaker: Louis A. Mezzullo

SCHEDULE OF EVENTS

THURSDAY, FEBRUARY 25

Thursday, February 25 | 7:30 am-4:45 pm

Registration and MCLE Sign-In

Thursday, February 25 | 7:30 am-8:15 am

Continental Breakfast

SESSION 1

Thursday, February 25 | 8:15 am-9:15 am

Honey–I Forgot About the Income Tax

Estate planners understand how to deal with estate and gift tax issues but not always with the income tax consequences of the plan. So many estate plans were completed without the layer spotting and dealing with applicable income tax issues. The panel will discuss income tax issues regularly confronting estate planners and how to avoid the eye of the storm by ignoring the income tax implications of the strategies the planners recommend.

Specialty Credit: **Tax:** Individual Income Tax; Corporate Income Tax; Partnership Income Tax; Real Estate Income Tax; California Taxes; Estate, Gift Tax and Estate Planning

Trusts & Estates: Estate Planning

Speakers: **Belan Wagner**

Minna Yang

SESSION 2

Thursday, February 25 | 9:20 am-10:20 am

The Sale Is Over–Now What Do I Do?

Most practitioners are adept at forming and completing the sale, including the case law such as Wandry, however what about the follow-up and maintenance? The speaker will focus on properly dealing with issues that are often encountered post sale such as: renegotiating the promissory note if needed, trust cash and note payments. Other important items such as proper communication with the trustee, client and trust protector, changing trust protectors and exercising trust protector powers will be covered as well.

Specialty Credit: **Tax:** Individual Income Tax; Partnership Income Tax; Real Estate Income Tax; California Taxes; Estate, Gift Tax and Estate Planning

Trusts & Estates: Estate Planning

Speaker: **Jeffrey Stephens**

Thursday, February 25 | 10:20 am-10:35 am

Break

SESSION 3

Thursday, February 25 | 10:35 am-11:35 am

Death Bytes: Planning and Administering the Digital Estate

"Digital property" is no longer merely a concept, it has become a reality, and we need to advise clients on how to ensure access to and disposition of their digital assets. Our speakers will discuss the types and characteristics of digital assets, unique challenges in planning with them, controversies over current applicable laws and proposed new laws governing control of such assets, and how to advise clients at both the planning and administration stages. As a bonus, the speakers will also mention some related ethics issues.

Specialty Credit: **Tax:** Estate, Gift Tax and Estate Planning

Trusts & Estates: Estate Planning

Speakers: **Julie Miraglia Kwon**

John T. Rogers, Jr.

Thursday, February 25 | 11:35 am-11:50 am

Break

SESSION 4

Thursday, February 25 | 11:50 am-12:50 pm

A Discussion on the Ever Changing Practice of Law

The panel will discuss practical insights into maintaining a relevant and rewarding law practice.

Specialty Credit: **Ethics**

Tax: Estate, Gift Tax and Estate Planning; Ethics of Tax Practice

Trusts & Estates: Estate Planning

Speaker: **Phil Feldman**

SESSION 5

Thursday, February 25 | 12:55 pm-2:25 pm

The Win Win of Charitable Planning

The panel will focus on CRT's-how they work and how well different assets have historically performed within these vehicles. Focus will then turn to the use of non-cash assets such as real estate, appreciated stock, privately held companies, retirement assets, and collectables allowing donors the ability to fulfill their philanthropic goals while maximizing charitable deductions. Finally, discussion will focus on the various considerations involved in making charitable gifts of non-cash assets depending on the charitable vehicle selected, including the ability to spread capital gains and minimize NIIT when contributing non-cash assets to charitable remainder trusts.

Specialty Credit: **Tax:** Individual Income Tax; Estate, Gift Tax and Estate Planning; Tax Exemption Organization

Trusts & Estates: Estate Planning

Speakers: **Rebecca O'Toole**

Andrea Ross

Vimala Snow

Thursday, February 25 | 2:25 pm-2:40 pm

Break

SESSION 6

Thursday, February 25 | 2:40 pm-3:55 pm

The Nature and Effectiveness of Domestic Asset Protection Trusts

This panel, including a retired Chief Judge of the U.S. Bankruptcy Court and counsel from FTB, will examine and explore the viability of these structures. They will analyze the techniques, the various jurisdictions utilized and their viability.

Specialty Credit: **Ethics**

Tax: Individual Income Tax; California Taxes; Estate, Gift Tax and Estate Planning; Ethics of Tax Practice

Trusts & Estates: Estate Planning

Speakers: **Judge Peter Bowie**

George D. Karibjanian

Sonia Woodruff

SESSION 7

Thursday, February 25 | 4:00 pm-5:00 pm

Planning for Nonresident Aliens and Their US Families

The panel will discuss the problems and issues facing estate planners wo deal with foreign persons. They will cover planning and transfer tax issues. They will also discuss residency as well as those need to now acronyms such as CFCs, PFICs and FIRPTA.

Specialty Credit: **Tax:** Individual Income Tax; Estate, Gift Tax and Estate Planning; International Tax

Trusts & Estates: Estate Planning

Speakers: **William Finestone**

Susan Witkin

FRIDAY, FEBRUARY 26

Friday, February 26 | 7:30 am-4:45 pm

Registration & MCLE Sign-in

Friday, February 26 | 7:30 am-8:20 pm

Continental Breakfast

SESSION 8

Friday, February 26 | 8:20 am-10:35 am

A Fireside Chat with District Counsel, Audit and the Former Estate and Gift Tax Branch Chief

The panel will discuss what's new at counsel's office and in appeals. The speakers will discuss how to obtain guidance in DC through informal or formal procedures. Hot audit issues will be covered as well as the new basis regulations and 2704.

Specialty Credit: **Tax:** Estate, Gift Tax and Estate Planning; Current Developments

Trusts & Estates: Estate Planning; Estate and Gift Tax return preparation and audit

Speakers: **Donna Herbert**, IRS Senior District Counsel

James F. Hogan

Robin Klomparens

Kyle Martin

Friday, February 26 | 10:35 am-10:50 am

Break

SESSION 9

Friday, February 26 | 10:50 am-11:50 am

Those Gnarly U.S. Estate Tax Reporting Rules Applicable to Foreigners–What You Need to Know

The speaker will review the U.S. estate tax reporting requirements applicable to non-resident, non-citizens who die leaving U.S. sitused assets as well as those applicable to covered expatriates. The program will focus on the compliance aspects of completing the Form 706-NR and other applicable filings.

Specialty Credit: **Tax:** Individual Income Tax; Corporate Income Tax; Partnership Income Tax; Real Estate Income Tax; Estate, Gift Tax and Estate Planning; International Tax

Trusts & Estates: Estate Planning

Speaker: **Wayne Johnson**

Friday, February 26 | 10:50 am-12:05 pm

Break

SESSION 10

Friday, February 26 | 12:05 pm-12:50 pm

Keeping Your Client Safe from Predators–How to Deal with Diminishing Capacity and Related Ethical Issues

The panel composed of a RN/attorney and a geriatric psychologist will discuss how to deal with diminishing capacity and ethical issues. The discussion will include the continuum of capacity, the complexity of financial capacity and how it compares with testamentary capacity. They will also address myths about a so called "normal" relationship with a cognitively impaired person and ethical challenges with clients who are impaired.

Specialty Credit: **Ethics**

Tax: Estate, Gift Tax and Estate Planning; Ethics of Tax Practice

Trusts & Estates: Incompetency planning and administrative procedure; Estate Planning

Speakers: **Dr. Miko Davis**

Carolyn Rosenblatt

SESSION 11

Friday, February 26 | 12:55 pm-2:25 pm

What Every Practitioner Needs to Know to Stay on Top of Current Trends and Developments Affection Advisors and Their Clients

The speaker will provide an overview of recent developments and significant changes in wealth transfer taxes that have occurred in the past few years. He will also focus on legislative (including pending) and case law developments.

Specialty Credit: **Tax:** Estate, Gift Tax and Estate Planning; Current Developments

Trusts & Estates: Estate Planning; Estate and gift tax return preparation and audit

Speaker: **Andrew Katzenstein**

Friday, February 26 | 2:25 pm-2:40 pm

Break

SESSION 12

Friday, February 26 | 2:40 pm-3:40 pm

Major Mistakes Made by Multi-Millennials: Planning for the Rising Generation

In addition to the new wealth from technology-related businesses that have been created by the Millennial Generation (also known as Generation Y), Millennials are expected to inherit close to $30 trillion over the next 30 to 40 years. However, despite their vision and intelligence, many Millennials are not adequately prepared to manage their new wealth and, therefore, fall into similar planning traps. The speaker will explore some common planning mistakes made by Millennials – such as private foundations that aren't private, GRATs that aren't so great, and estate plans that aren't well-planned –but will offer potential solutions to these problems.

Specialty Credit: **Tax:** Estate, Gift Tax and Estate Planning; Tax Exemption Organization; Current Developments

Trusts & Estates: Estate Planning

Speaker: **Justin Miller**

SESSION 13

Friday, February 26 | 3:45 pm-5:00 pm

Keeping It in the Family: Business Succession Planning for the Family Business

The speaker will describe the characteristics of a family business, the goals of the founding family member, and the various strategies for passing the business own to the next generation or disposing of it outside the family, in some cases with examples. He will also discuss the business succession planning process and highlight difficult issues that can arise and ways to avoid or minimize problems. ESOPs, sales to grantor trusts and other planning techniques, including the related tax issues, will also be covered.

Specialty Credit: **Tax:** Individual Income Tax; Corporate Income Tax; Partnership Income Tax; Compensation and Benefits Tax; California Taxes; Estate, Gift Tax and Estate Planning

Trusts & Estates: Estate Planning

Speaker: **Louis A. Mezzullo**

REGISTRATION INFORMATION

ONLINE REGISTRATION:
Now available at 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.)***

CANCELLATIONS/REFUND POLICY:
Cancellations and requests for refunds must be received in writing no later than Thursday, February 18, 2016 and are subject to a $50 service charge. Refunds will not be available after February 18, 2016.

QUESTIONS:
For registration information call (415) 538-2508. For information regarding the program please 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.

REGISTRATION FORM

The Twenty-Fourth Annual Estate and Gift Tax Conference

Bar Number: ______________________________

Name: ______________________________

Firm: ______________________________

Firm Address: ______________________________

City, State: ______________________________ Zip Code: ______________________________

Phone Number: ______________________________

Email Address: ______________________________
(Required for e-mail confirmation)

Program package includes 15.5 hours of MCLE and legal specialization credits, program materials, continental breakfast and lunch.

❑ Check here if you do not want your information released.

REGISTRATION FEE (PRE-REGISTRATION THROUGH FEBRUARY 18, 2016)

	Until Feb.18 *(based on space availability)*	**After Feb.18**	**Total Cost**
Current Taxation Section Member only			
o Thursday, February 25, 2016	$295	$370	$________
o Friday, February 26, 2016	$295	$370	$________
o Combined 2-Day Meeting Package	$545	$695	$________
Non-Section Members (Includes enrollment in the Taxation Section for 2016)			
o Thursday, February 25, 2016	$390	$465	$________
o Friday, February 26, 2016	$390	$465	$________
o Combined 2-Day Meeting Package	$640	$790	$________
Government Attorneys, Current Section Members only			
o Thursday, February 25, 2016	$195	$270	$________
o Friday, February 26, 2016	$195	$270	$________
o Combined 2-Day Meeting Package	$345	$495	$________
Government Attorneys, Non-Section Members only (Includes enrollment in the Taxation Section for 2016)			
o Thursday, February 25, 2016	$290	$365	$________
o Friday, February 26, 2016	$290	$365	$________
o Combined 2-Day Meeting Package	$440	$590	$________

COURSE MATERIALS

Registrants will receive course materials on a USB flash drive at the conference at no additional charge. Course materials may also be downloaded from the meeting website for paid registrants at no charge. Optional printed 2016 Estate and Gift Tax Conference course materials may be pre-purchased for $25 a set. Please note that printed course materials will only include those materials available at time of printing, and may not be a complete set of the final course materials.

PRINTED VERSIONS ARE PRE-ORDERS ONLY. PRINTED MATERIALS ARE NOT AVAILABLE FOR PURCHASE AFTER FEBRUARY 18, 2016

o Printed Course Materials	$25	n/a	$________

TOTAL AMOUNT ENCLOSED/TO BE CHARGED $________

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: ______________________________

Expiration Date: ______________________________

Cardholder's Name: ______________________________

Cardholder's Signature: ______________________________

The State Bar of California
TAXATION SECTION
180 Howard St
San Francisco, CA 94105

KEY DEADLINE

Early-bird Pre-Registration is **February 18, 2016**