HOUSTON

Annual Tax & Business Planning Seminar

Where:

The Houstonian Hotel
111 N. Post Oak Lane
Houston, Texas 77024

When:

Wednesday, October 30, 2024

Registration:
11:00 a.m. - 11:45 a.m.

Luncheon Presentation:
11:45 a.m. - 1:00 p.m.

Seminars:
1:05 p.m. - 5:30 p.m.

Reception:
5:30 p.m. - 6:30 p.m.

Chamberlain Hrdlicka
Attorneys at Law

ATLANTA HOUSTON PHILADELPHIA SAN ANTONIO

www.chamberlainlaw.com

Houston's 47th Annual Tax & Business Planning Seminar

REGISTRATION FEE:
$150 PER PERSON
$175 PER PERSON WALK-IN WITH NO RESERVATION

BINDER FEE:
For attendees that prefer, a hard copy binder is available for $75 per binder.

Texas CLE: 5.0 credit hours
Texas CPE: 6.0 credit hours
There are no prerequisites for these courses.

Register online:
https://www.chamberlainlaw.com/news-events-houston-tax-seminar-2024.html

Schedule:

11:00 a.m. - 11:45 a.m.	Registration
11:45 a.m. - 1:00 p.m.	Luncheon Presentation
1:05 p.m. - 3:10 p.m.	Presentations
3:10 p.m. - 3:25 p.m.	Break
3:25 p.m. - 5:30 p.m.	Presentations
5:30 p.m. - 6:30 p.m.	Reception

LUNCHEON PRESENTATION

From the Commissioner, A Look Inside the IRS
By Former IRS Commissioner and Shareholder Charles Rettig

The Inflation Reduction Act of 2022 appropriated almost $80 billion to the IRS to be expended over 10 years, mostly for Taxpayer Services, Enforcement, Operations Support, and Business Systems Modernization. Former IRS Commissioner Chuck Rettig will discuss the importance of these funds to support meaningful, effective tax administration for your clients, you, and our country.

CHAMBERLAIN HRDLICKA HISTORY

Chamberlain Hrdlicka started out as a tax boutique firm in Houston in 1965. While Chamberlain Hrdlicka has expanded with offices nationwide, the tax practice remains the core strength of the firm, with approximately half of our total lawyers practicing in one of the varied fields of tax law.

Many of our attorneys are board certified in tax law or estate planning or related areas and have worked with the IRS, the Department of Justice Tax Division, and the U.S. Tax Court. The Firm represents a wide range of large multinationals and public companies, privately held businesses, partnerships and joint ventures, individuals, estates, and tax-exempt organizations in a broad range of tax, business advisory, transactional, litigation, and collection matters.

The Chamberlain Hrdlicka Tax and Business Planning Seminars have provided valuable tax and business information in Houston for 47 years and Atlanta for 39 years. Chamberlain Hrdlicka opened its San Antonio office in 2010, and expanded its Annual Seminar to San Antonio in 2018, and to McAllen and Laredo in 2019.

PRESENTERS

BRETT T. BERLY

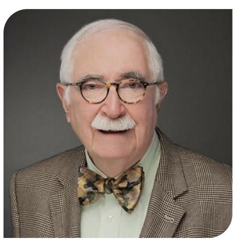
University of Texas School of Law (J.D., *cum laude*, 2005); University of Texas at Austin (B.A., *cum laude*, 2001)

MARCUS BURNSIDE

University of Houston Law Center (J.D.); University of Houston (M.S., Electrical Engineering); University of Texas at Dallas (B.S., Mechanical Engineering)

SEBASTIEN N. CHAIN

Georgetown University Law Center (LL.M. Taxation, Honors, 2011); University of Houston Law Center (J.D., *cum laude*, 2010); University of Texas at Austin (B.A., Honors, 2005)



GEORGE W. CONNELLY

Northwestern University (J.D., 1971); Northwestern University (B.S., B.A., 1967)

ALY DOSSA

University of Houston Law Center (J.D., 2005); Queen's University, Canada (B.S., first class honors, Engineering Chemistry, and B.S., with distinction, Computer Science, 2001)

BRYAN J. DOTSON

Texas Tech University School of Law (J.D., 2011); Texas Tech University (M.S., 2011); University of Houston (B.A., 2007)

ALISSA GIPSON

University of Houston Law Center (LL.M., Taxation, 2017); University of Houston Law Center (J.D., 2016); Texas A&M University (B.A., *magna cum laude*, 2011)

HABEEB "HOBBS" GNAIM

Georgetown University Law Center (LL.M. in Taxation, with Distinction); Southern Methodist University Dedman School of Law (J.D.); University of St. Thomas (B.B.A. in Economics, *summa cum laude*)

JACK NAJARIAN

University of Illinois College of Law (J.D., *magna cum laude*, 2012); University of Houston Honors College (B.A. in Economics, Political Science, Classical Studies Minor, University Honors with Honors in Major, 2009)

JONATHAN M. STASNEY

University of Houston Law Center (J.D. and L.L.M. in Taxation, 2023); Texas A&M University (Masters in Accounting, *cum laude,* 2014); Texas A&M University (B.S. in Accounting, *cum laude,* 2013)

J. OTTO TIMM

University of Houston Law Center (LL.M. in Taxation, 2020); Emory University School of Law (J.D., 2019); Pitzer College (B.A. in Anthropology, 2013)

LUZ E. VILLEGAS-BAÑUELOS

University of San Diego School of Law (LL.M. Taxation, 2020); University of San Diego School of Law (*magna cum laude*, 2019, Order of the Coif, CALI Award (highest grade) in Tax I, San Diego International Law Journal, Provisional Member); Law degree from CETYS Universidad in Baja California, Mexico (2016, with highest honors)

TYLER WILLIAMS

South Texas College of Law Houston (J.D., Valedictorian, 2022, Articles Editor, South Texas Law Review); Texas A&M University (B.S., Industrial Distribution, 2018)

PRESENTATIONS

You may attend any workshop on a first-come, first-served basis as seating allows.

1:05 P.M. - 2:05 P.M.

1A Keeping the Peace in the House of the Dragon: Tax and Business Considerations with Company Succession to Avoid an Intercompany Civil War

This presentation will be a deeper dive into tax and business issues related to company succession of a closely held business to avoid a future civil war within the company that can arise from poor or nonexistent planning once the next generation of owners get involved. Topics to be discussed include various methods/strategies to transition a business peacefully, ensuring that the business is in a tax friendly structure that will facilitate business succession objectives, and key provisions to buy-sell agreements.

Presenter: Habeeb "Hobbs" Gnaim

1B Pandora's Algorithm: The Promise and Perils of AI in Taxation

This presentation explores the transformative potential of AI in the world of tax, while also addressing the inherent risks and ethical considerations. The talk will delve into the challenges, such as data privacy concerns, algorithmic biases, and the risks of over-reliance on technology. The goal is to equip tax professionals with a balanced perspective on harnessing AI's power while mitigating its dangers.

Presenters: Aly Dossa and Marcus Burnside

2:10 P.M. - 3:10 P.M.

2A Judicial Highlights

A timely review of the past year's most significant court decisions on federal and state tax issues.

Presenters: Alissa Gipson and Jonathan M. Stasney

2B Foreign Entity, Asset and Transaction Reporting That You and Your Clients Need to Know About

This presentation will explore critical aspects of foreign entity, asset and transaction reporting for U.S. tax purposes via several case studies. Topics covered will include: (i) Determining whether clients are U.S. residents and what their reporting obligations are; (ii) reporting interests in CFCs and PFICs; (iii) Tracking and utilizing previously taxed earnings and profits of a foreign corporation; (iv) Calculating GILTI and properly reporting a Section 962 or high-tax-exemption election; and (v) Reporting changes in your clients' foreign business, including reorganizations, entity classification elections, liquidations and sales.

Presenters: Sebastien N. Chain and J. Otto Timm

3:10 P.M. - 3:25 P.M. BREAK

3:25 P.M. - 4:25 P.M.

3A The FAIR Tax

Recommendations for a system to replace our income tax based tax system arise regularly. In this presentation, we will explore the most prevalent one for a "FAIR" Tax System.

Presenter: George W. Connelly

3B When a Nothing Turns Into a Something: Working with Disregarded Entities and Grantor Trusts in Estate Planning

In this presentation, we will address planning and reporting issues with disregarded entities and grantor trusts, including basis adjustments and implications when such status ends.

Presenter: Brett T. Berly and Tyler Williams

4:30 P.M. - 5:30 P.M.

4A Navigating the Corporate Transparency Act: Real-World Insights and Compliance Strategies

Effective at the beginning of this year, the Corporate Transparency Act went into effect, creating a compliance obligation for approximately 32 million entities in the United States. Building on last year's presentation on this topic, we'll provide a briefer overview, and then delve into our experiences in assisting clients and discuss practical examples and issues we've run into. The Corporate Transparency Act (CTA) is a new law that requires entities (LLCs, Corporations, LPs etc.), unless they qualify for an exemption, to disclose information about their beneficial owners with the Financial Crimes Enforcement Network (FinCEN). Failure to comply can result in civil penalties and criminal penalties (including jail time).

Presenters: Jack Najarian and Luz E. Villegas-Bañuelos

4B Texas Sales and Use and Franchise Tax Updates

This session discusses recent developments in the Texas sales and use and franchise taxes. The discussion will cover key legislative changes, recent court decisions, and amendments to Texas Comptroller regulations.

Presenter: Bryan J. Dotson

5:30 P.M. - 6:30 P.M. RECEPTION

REGISTRATION FORM

CHAMBERLAIN HRDLICKA
HOUSTON'S 47TH ANNUAL TAX & BUSINESS PLANNING SEMINAR
Wednesday, October 30, 2024

Registration may be completed online at:
https://www.chamberlainlaw.com/news-events-houston-tax-seminar-2024.html

Alternatively, you may fill out the form below and mail it along with a check/money order payable to:
Chamberlain Hrdlicka
Attn: Meg Grossman
1200 Smith Street, Suite 1400
Houston, TX 77002

REGISTRATION FEE:
$150 PER PERSON
$175 PER PERSON WALK-IN WITH NO RESERVATION

BINDER FEE:
$75 PER HARD COPY

Full Name ______________________________ Firm ______________________________

Title ______________________________ ☐ CPA ☐ Attorney ☐ CFP

Address ____

City ______________________________ State __________ Zip ____________________

Telephone ____________________ Fax ____________________ Email ____________________

☐VISA ☐MC ☐AMEX ☐DISCOVER Card Number ______________________________

Exp. Date ____________________ Signature ______________________________

If you have any questions, please contact Meg Grossman at 713.356.1230 or tax.registration@chamberlainlaw.com.

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