Chamberlain Hrdlicka
Attorneys at Law

Chamberlain Hrdlicka 2nd Annual San Antonio Tax and Business Planning Seminar - November 6, 2019 at Wyndham San Antonio Riverwalk

November 6, 2019

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Chamberlain Hrdlicka's 2nd Annual San Antonio **Tax and Business Planning Seminar** will take place on Wednesday, November 6, 2019 at the Wyndham San Antonio Riverwalk from 8:30 a.m. - 5:00 p.m. Afterward, you are invited to join us for a **Happy Hour** at our office starting at 5:00 p.m. at the Weston Centre, 112 East Pecan Street, Suite 1450 (across from the Wyndham). Anyone is welcome to register to attend.

CLE/CPE CREDIT
Texas CPAs: 8.0 CPE credit hours
Texas Attorneys: 6.75 CLE credit hours approved
Enrolled Agents: 6.0 CE credit hours approved
No prerequisites for this tax seminar.

Locations:

Seminar - Wyndham San Antonio Riverwalk

Happy Hour - Chamberlain Hrdlicka office at Weston Centre, 112 East Pecan Street, Suite 1450 (across from the Wyndham)

Workshops Schedule - All workshops will be 50 minutes long
8:30–9:00 am Registration
9:00–9:50 am Tax Reform and Choice of Entity After 2017 and Top Employee Benefits Tax/
ERISA issues
10:00–10:50 am Estate Planning Ideas for the (Currently) Non-Taxable Estate
11:00–11:50 am Nuts and Bolts of Qualified Opportunity Zones
12:00–12:50 pm KEYNOTE LUNCH DISCUSSION: Texas Tax Law Update in light of the U.S. Supreme Court's Decision In South Dakota v. Wayfair
1:00–1:50 pm International Tax
2:00–2:50 pm Tax Controversy Update: Judicial Highlights and Taxpayer First Act of 2019
3:00–3:50 pm Trust, Estate and Guardianship Litigation Update
4:00–4:50 pm The End of the Road: Advising Clients that Owe the IRS a lot of Money
5:00–7:00 pm Happy Hour at Chamberlain Hrdlicka's office

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Tax Reform and Choice of Entity After 2017 and Top Employee Benefits Tax/ERISA issues
Just when you thought you had it figured out, tax reform created new thoughts on choice of entities. This seminar will revisit choice of entity structures, M&A transactions, as well as employee benefits issues in light of recent tax law changes.
Presenter: Joshua A. Sutin

Estate Planning Ideas for the (Currently) Non-Taxable Estate
The Texas Cuts and Jobs Act of 2017 has temporarily shifted the estate planning techniques for many clients who once had "taxable estates" by increasing the amount that an individual could pass free from wealth transfer taxes (gift, estate, and generation-skipping transfer taxes) from $5.5 million to $11.18 million. While the clients may relish in "simpler" estate plans, they are not without risk – especially since the Act sunsets on
December 31, 2025. We discuss estate planning options for these clients and explore other potential planning opportunities under the new but potentially temporary Act.
Presenters: Matthew Flores and Lauren Parker

Nuts and Bolts of Qualified Opportunity Zones
Texas communities are home to numerous recently designated "Opportunity Zones" that should be of interest to investors and real estate developers. This presentation focuses on what it takes to qualify for preferential tax treatment as provided by the 2017 Tax Cuts and Jobs Act when it comes to investing in these opportunity zones. We will discuss opportunity zones in general, what it takes to meet the statutory requirements of "qualified opportunity zone funds," the tax benefits of investing in a qualified opportunity zone funds, and timing issues.
Presenter: Katherine Noll

Keynote Lunch Discussion: Texas Tax Law Update in light of the U.S. Supreme Court's Decision In South Dakota v. Wayfair
The U.S. Supreme Court recently issued a landmark tax case, South Dakota v. Wayfair, which has far-reaching implications for multistate businesses. The panel will discuss the case and ramifications that are important to clients, with a particular focus on Wayfair's application in Texas.
Presenters: Hon. David M. Medina, Texas Supreme Court (Ret.)
and Juan F. Vasquez, Jr.

GILTI and the Acronyms: The World Tour
This session will provide a high-level overview of the TCJA's changes to the international tax provisions. It will focus primarily on GILTI, FDII, and Section 245A, and it will touch on the changes to the foreign tax credit, Section 267A, and the Section 962 election. The discussion also will include examples.
Presenters: Sebastien N. Chain and Adrian Ochoa

Tax Controversy Update: Judicial Highlights and Taxpayer First Act of 2019
We will provide a timely review of important tax cases from the last year. We will also discuss new taxpayer rights added to the Code by the Taxpayer First Act signed into law in July 2019.
Presenters: Juan F. Vasquez, Jr. and Leo Unzeitig

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Trust, Estate and Guardianship Litigation Update
A survey of recent cases and issues currently being litigated to be considered in advising clients on how to identify potential current or future trouble spots and strategies to best protect them from creditors, predators and other dangers to their assets and family harmony.
Presenter: James McNeel

The End of the Road: Advising Clients that Owe the IRS a Lot of Money Whether the result of willful or non-willful conduct, clients that owe (or will owe) the IRS a lot of money naturally generate a series of seemingly straightforward questions, but with complicated answers that touch several areas of tax law. Is there criminal exposure? Should the client cooperate with the IRS? Will the IRS or the Department of Justice seize the client's assets? What are my obligations as a practitioner? The presenters will seek to answer these questions based on their perspective from a combined 60 years of practicing tax law.

Presenters: Jaime Vasquez and Chad J. Muller III