36th Annual
FEDERAL TAX INSTITUTE

Critical tax knowledge for tax executives and professionals, including recent developments, hot topics, and key insights

MAY 18 2017
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36th Annual
FEDERAL TAX INSTITUTE

You will have personal access to nationally recognized tax advisors who provide a comprehensive update on the cutting-edge legal, legislative, and policy developments that impact tax planning, compliance, and controversy techniques. Concentrated succinctly into a one-day conference, get hands-on practical knowledge, 8.0 hours of CLE credit, and 9.5 hours of CPE credit.

CONFERENCE AT A GLANCE

7:30am–8:20am
Registration

8:20am–8:25am
Welcome

8:25am–9:40am
Federal Tax Legislative Update

9:40am–9:50am
Break

9:50am–11:20am
Federal Tax Law Year in Review
SALT Year in Review

11:20am–11:30am
Break

11:30am–12:30pm
Concurrent Sessions
- Hot Topics in Partnership Taxation
- Recent Updates in International Tax Law

12:30pm–12:50pm
Box Lunch Pick-Up

12:50pm–1:50pm
Luncheon Sessions
- Hot Topics in Tax Accounting
- Structuring Issues in Taxable Acquisitions and Dispositions

1:50pm–2:00pm
Break

2:00pm–3:00pm
Post-Luncheon Plenary Panel
Business Tax Reform

3:00pm–3:15pm
Break

3:15pm–4:30pm
Corporate Tax Developments

4:30pm–4:40pm
Break

4:40pm–5:40pm
New Duties Under 1.1—Technology Competence

5:40pm
Networking Reception
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Senior Manager, Tax Accounting  
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Reach  
Director, Law Practice  
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Senior Fellow, Urban-Brookings Tax Policy Center  
Urban Institute

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Principal  
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Peter F. Simpson
Grant Thornton LLP

Louis J. Weber III
Winston & Strawn LLP

Thomas Zollo
KPMG LLP
7:30am-8:20am
Registration

8:20am-8:25am
Welcome
Gerald Brown, Director, Graduate Program in Taxation, Chicago-Kent College of Law

PROGRAM MODERATORS
Gregory W. Gallagher, Partner, Kirkland & Ellis LLP
David Hoffman, Partner, Deloitte Tax LLP
Joseph M. Kronsnoble, Partner, Latham & Watkins LLP
Lee K. Morlock, Partner, Mayer Brown LLP

8:25am-9:40am
Federal Tax Legislative Update
Federal tax reform is a high priority for the Republicans who are in control of Congress and the White House. However, accomplishing that goal is not as simple as it seems. This panel will address the current “state of play” in the tax reform debate. Topics include:
• Politics
• Procedural obstacles
• Revenue constraints
• Views on the form and substance of business income tax reform
• Individual income tax proposals
• Wealth transfer tax initiatives
Harry L. Gutman, Of Counsel, Ivins, Phillips, & Barker Chtd.
Thomas A. Stout, Jr., Director, Federal Tax Legislative & Regulatory Services, KPMG LLP

9:40am-9:50am
Break

9:50am-11:20am
Federal Tax Law Year in Review
Update on the most recent developments in case law and rulings in the federal income, estate and gift, and employee benefits tax areas.
Lydia R.B. Kelley, Partner, McDermott, Will, & Emery LLP
Michael R. Fayhee, Partner, McDermott, Will, & Emery LLP

SALT Year in Review
Discussion of significant cases, rulings and legislative developments impacting state income/franchise, sales and use, gross receipts, and other taxes throughout the United States.
John A. Biek, Partner, Neal, Gerber, & Eisenberg LLP
Theodore R. Bots, Partner, Baker & McKenzie LLP

11:20am-11:30am
Break

11:30am-12:30pm
CONCURRENT SESSIONS

Hot Topics in Partnership Taxation
The panelists will discuss using partnerships to leverage “zero-tax” section 1202 stock.
Charles R. Levun, Partner, Levun, Goodman, & Cohen LLP
Chadwick I. Buttell, Partner, Patik, Frank, & Samotny Ltd.

Recent Updates in International Tax Law
The panel will discuss the latest developments in international tax law with a particular emphasis on the legislative proposals being considered by Congress. They will provide a description of each
of the key proposals and how each of them would apply.

James R. Barry, Partner, Mayer Brown LLP
Mark Genrizi, Principal, PwC

12:30pm-1:20pm
Box Lunch Pick-Up

12:50pm-1:50pm
LUNCHEON SESSIONS

Hot Topics in Tax Accounting
This session will discuss recent tax and accounting developments, potential future changes, and the implications under FASB Accounting Standards Codification Topic 740, Income Taxes (“ASC 740”). The session will explore how a tax executive should evaluate, document and communicate these changes and potential risks.

Natalie Heinan, Senior Manager, Tax Accounting and Risk Advisory Services, Grant Thornton LLP
Ed Weaver, Senior Manager, International Tax Services, Grant Thornton LLP

Structuring Issues in Taxable Acquisitions and Dispositions
The focus of this panel will be:

• Recent developments and current market trends in structuring taxable acquisitions and dispositions
• Key concerns in drafting purchase agreements to reflect the parties’ economic expectations

Jocelyn F. Noll, Partner, Latham & Watkins LLP
Daniel W. Sirken, Tax Partner, Deloitte Tax LLP

1:50pm-2:00pm
Break

2:00pm-3:00pm
POST-LUNCHEON PLENARY PANEL

Business Tax Reform
Two long-time tax policy veterans will exchange views on business tax reform. They will discuss the challenges of our current rules—and possible approaches to address these challenges (and likelihood of enactment). Those approaches include (i) broadening the tax base and reducing rates, (ii) shifting towards a consumption tax, and (iii) addressing select issues, such as the double-taxation of corporate earnings (and, as a corollary, the single taxation of pass-through entities), financial product taxation, and retirement saving incentives.

Ray Beeman, Principal, Washington Council, Ernst & Young LLP
Steven M. Rosenthal, Senior Fellow, Urban-Brookings Tax Policy Center, Urban Institute

3:00pm-3:15pm
Break

3:15pm-4:30pm
Corporate Tax Developments
This panel will focus on developments in corporate taxation, including recently issued regulations and other guidance on both taxable and tax-free transactions.

William D. Alexander, Of Counsel, Skadden, Arps, Slate, Meagher, & Flom LLP
Eric Solomon, Co-Director, National Tax, Ernst & Young LLP
John F. Tarrant, Senior Attorney, IRS

4:30pm-4:40pm
Break

4:40pm-5:40pm
New Duties Under 1.1—Technology Competence
Effective January 1, 2016 comments to IL RPC 1.1 were updated to state “a lawyer should keep abreast of changes in the law and its practice, including the benefits and risks associated with relevant technology…” What does technology competency mean? We will explore what lawyers should know about including metadata, the cloud, email, social media, encryption, discovery and more.

Catherine Sanders Reach, Director, Law Practice Management & Technology, The Chicago Bar Association
Ari Telisman, Litigation Counsel, Illinois Attorney Registration and Disciplinary Commission

5:40pm-6:40pm
Networking Reception
## UP Com ing CLE Conferences

<table>
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<tr>
<th>Date</th>
<th>Event</th>
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<tr>
<td>March 16, 2017</td>
<td>The State of Cannabis Law in 2017 and Beyond</td>
<td>Eligible for 3.0 hrs IL MCLE credit</td>
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<td>April 4, 2017</td>
<td>39th Annual Kenneth M. Piper Lecture <em>(free!)</em></td>
<td>Smartphones and Fitbits: Wither Privacy in the Workplace? Eligible for 1.25 hours of IL MCLE credit</td>
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<td>April 7, 2017</td>
<td>Defending Our Data: Privacy, Security, and the Wave of Data Breaches <em>(free!)</em></td>
<td>Eligible for 4.75 hrs IL MCLE credit</td>
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<td>April 20-21, 2017</td>
<td>34th Annual Section 1983 Civil Rights Litigation Conference</td>
<td>Eligible for 11.25 hours of IL MCLE credit</td>
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<tr>
<td>June 8, 2017</td>
<td>36th Annual Conference on Not-For-Profit Organizations</td>
<td>IL MCLE credit to be determined</td>
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## Why Attend?

As an experienced practitioner you won’t want to miss this hands-on, immediately relevant, masters’ level institute.

You will:

- Hear directly from the most prominent firm heads and government experts in the field
- Interact directly with each panel during Q&A
- Connect and learn from your peers nationwide

“This conference lets me focus on issues directly relevant to my practice.”  
– Previous Attendee
CONTINUING EDUCATION CREDIT

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HOTEL ACCOMMODATIONS

We have negotiated a special rate for our conference attendees at the following hotel: **Cambria Hotel & Suites Chicago Magnificent Mile**

is a modern boutique hotel with rooftop lounge located in the heart of Chicago's Magnificent Mile. It is a short cab ride to the law school.

The group rate is $149/night plus tax. Reservation can be made online at [bit.ly/taxlaw17](http://bit.ly/taxlaw17) or contacting the hotel directly at (312)787-6000. To enjoy this special group rate, reservations must be made by April 20, 2017. Be sure to mention you are attending the 2017 Federal Tax Institute to receive our group rate.

CANCELLATION POLICY

A full tuition refund will be granted if received in writing by April 13, 2017. Tuition, less a 25% cancellation fee will be granted if received between April 14, 2017 and May 11, 2017. No refunds will be granted if received after May 11, 2017, but a substitution of attendees for this program will be permitted. Registrants not entitled to a refund will receive access to the written materials.

Email cancellation notices to cle@kentlaw.iit.edu

CONFERENCE LOCATION

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Chicago, IL 60661   (312)906-5090
FIRM SUPER TICKET

With the purchase of a Firm Super Ticket, you can send an unlimited number of attendees from your firm, invite 5 of your clients to attend the Institute for free, have open in and out privileges, and the course materials will be distributed electronically to the firm prior to the Institute. It’s a great group discount for a day of innovative learning. Firms who purchase the Super Ticket will also be publicly recognized for their support at the Institute.

$2,250.00 for Firm Super Ticket, lunch included

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State Zip

Telephone Fax

Email

Administrative contact who is coordinating registrations from your firm

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2. ________________________________ □
3. ________________________________ □
4. ________________________________ □
5. ________________________________ □
6. ________________________________ □
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INTERESTED IN SPONSORSHIP OPPORTUNITIES?

Get in front of your audience first-hand when you confirm your support as a session sponsor. Be everyone’s favorite phrase when you become a Wi-Fi sponsor. These are just a couple of the opportunities available at this conference and others throughout the year. Contact Kelly Calvanico, CLE Director, at 312.906.5091 or kcalvani@kentlaw.iit.edu for further information.
Federal Tax Institute 2017 Pricing (Lunch Included)

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<th>Submitted on or before 4/20/17</th>
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