37th Annual
FEDERAL TAX INSTITUTE
H.R. 1 Tax Cuts and Jobs Act—What Happens Now?

MAY 17 2018
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565 W. Adams Street
Chicago, IL 60661-3691
# 37th Annual Federal Tax Institute

HR 1 passed. What exactly does that mean? You will have personal access to nationally recognized tax advisors who will provide a comprehensive update on the impact of this legislation on an individual and corporate level and provide guidance on just how to implement the new law going forward. 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

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<th>Time</th>
<th>Session</th>
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<tr>
<td>7:30am–8:10am</td>
<td>Registration</td>
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<tr>
<td>8:10am–8:15am</td>
<td>Welcome</td>
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<tr>
<td>8:15am–9:30am</td>
<td>A Review of the Tax Cuts and Jobs Act</td>
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<tr>
<td>9:30am–10:15am</td>
<td>Tax Reform: Highlights for Individuals</td>
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<td>10:15am–10:30am</td>
<td>Break</td>
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<tr>
<td>10:30am–11:15am</td>
<td>Tax Reform: State and Local Impact</td>
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<tr>
<td>11:15am–12:00pm</td>
<td>Corporate Tax Developments, Including the Impact of the 2017 Tax Bill</td>
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<td>12:00pm–12:15pm</td>
<td>Lunch Pick-Up</td>
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<tr>
<td>12:15pm–2:00pm</td>
<td>Luncheon Panel, Tax Reform: Pass-Through Organizations</td>
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<td>2:00pm–2:15pm</td>
<td>Break</td>
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<tr>
<td>2:15pm–3:45pm</td>
<td>Tax Reform’s Impact on International Business Transactions</td>
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<td>3:45pm–4:00pm</td>
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<td>4:00pm–5:15pm</td>
<td>Transacting Under the New Regime—New Planning Considerations</td>
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<td>5:15pm</td>
<td>Networking Reception</td>
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FACULTY AND PLANNING COMMITTEE

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Mayer Brown LLP

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Senior Manager
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Chief Economist &
Contributing Editor
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Partner
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Senior Attorney
Internal Revenue Service

Alan Cathcart
Senior Director
Alvarez & Marsal Taxand LLC

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Senior Fellow, Urban-
Brookings Tax Policy Center
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Alvarez & Marsal Taxand LLC

Louis J. Weber III
Winston & Strawn LLP

Thomas Zollo
KPMG LLP
7:30am-8:10am  
Registration

8:10am-8:15am  
Welcome  
Gerald Brown, Director, Graduate Program in Taxation, Chicago-Kent College of Law

PROGRAM MODERATORS  
Joseph M. Kronsnoble, Partner, Latham & Watkins LLP  
Lee K. Morlock, Partner, Kirkland & Ellis LLP

8:15am-9:30am  
A Review of the Tax Cuts and Jobs Act  
• The speed of enactment  
• The principal substantive provisions  
• The potential economic effects  
• The major interpretive ambiguities  
• The prospects for correction—and future reforms  
Harry L. Gutman, Of Counsel, Ivins, Phillips, & Barker Chfd.  
Steven M. Rosenthal, Senior Fellow, Urban-Brookings Tax Policy Center, Urban Institute  
Martin A. Sullivan, Chief Economist & Contributing Editor, Tax Analysts

9:30am-10:15am  
Tax Reform: Highlights for Individuals  
This session will focus on the impact of tax legislation changes on individuals, as well as planning suggestions.  
Lydia R.B. Kelley, Partner, McDermott, Will, & Emery LLP  
Michael R. Fayhee, Partner, McDermott, Will, & Emery LLP

10:15am-10:30am  
Break

10:30am-11:15am  
Tax Reform: State and Local Impact  
This session will discuss potential state and local income tax implications of the 2017 federal tax reform provisions having the most significant impact on organizations, including interest deductibility, full expensing, the federal change to a territorial tax system, the one-time deemed repatriation, GILTI and BEAT provisions, and

“As expected, the speakers were outstanding and the subjects discussed were both timely and relevant.”  
– Previous Attendee
changes to the dividends received deduction.
John A. Biek, Partner, Neal, Gerber, & Eisenberg LLP
Theodore R. Bots, Partner, Baker & McKenzie LLP

11:15am-12:30pm
Corporate Tax Developments, Including the Impact of the 2017 Tax Bill
Recent corporate tax developments will be discussed, including provisions in the recently enacted tax bill affecting corporate 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

12:30pm-12:45pm
Lunch Pick-Up

12:45pm-2:00pm
LUNCHEON PANEL
Tax Reform: Pass-Through Organizations
The panel will discuss and analyze some of the key issues pertaining to the 20% deduction under Code §199A and will also focus on the business interest deductibility rules of Code §163(j) and the 100% expensing rules of Code §168(k), as they relate to flow-through entities.
Charles R. Levun, Partner, Levun, Goodman, & Cohen LLP
Julie Marion, Partner, Latham & Watkins LLP
Jennifer Wyatt, Partner, National Tax Services M&A, PwC

2:00pm-2:15pm
Break

2:15pm-3:45pm
Tax Reform’s Impact on International Business Transactions
The recent passage of tax reform significantly changes the U.S. tax landscape. This session will review the provisions affecting U.S. entities with international operation and foreign entities operating in the U.S.
James R. Barry, Partner, Mayer Brown LLP
Ed Weaver, Senior Manager, International Tax Services, Grant Thornton LLP
Thomas Zollo, International Tax Principal, Washington National Tax, KPMG LLP

3:45pm-4:00pm
Break

4:00pm-5:15pm
Transacting Under the New Regime—New Planning Considerations
The new tax law created substantial changes in corporate, pass-through, and individual tax provisions. In light of these changes, many companies are now asking whether it makes sense to change their structure from a pass-through entity to a C corporate entity. There are numerous factors to consider with a conversion and it is important to understand all the facts and circumstances and whether ultimately a new entity classification is the right choice moving forward. We intend to discuss some of the key factors we are seeing in the marketplace.
Alan Cathcart, Senior Director, Alvarez & Marsal Taxand LLC
Travis Loomis, Senior Manager, Deloitte Tax LLP
Roger Lucas, Partner, Kirkland & Ellis LLP

5:15pm-6:15pm
Networking Reception

“I got a great opportunity to attend this seminar and I enjoyed the format, level of discussion, and interaction between panelists.”
– Previous Attendee
LL.M. PROGRAM IN TAXATION

The Graduate Program in Taxation, which leads to an LL.M. degree in taxation, is designed for both full-time students and practicing attorneys who want to keep pace with developments in tax law and deepen their understanding of this field. The program, created and taught by full-time tax attorneys who are partners in major law firms and leaders of the national tax bar, takes a rigorous in-class approach to the problems that tax practitioners confront on a daily basis.

The program has benefited from significant contributions of time and resources by leading members of the tax bar. The Graduate Program in Taxation Advisory Board, which oversees the tax program, includes Chicago’s most respected tax lawyers.

For more information, please contact the Office of Graduate Admissions at (312) 906-5360 or send an email to admissions@kentlaw.iit.edu.

UPCOMING CLE CONFERENCES

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<th>Date</th>
<th>Event</th>
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<tr>
<td>April 10, 2018</td>
<td>40th Annual Kenneth M. Piper Lecture (free!)</td>
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<td>The Metastasization of Mandatory Arbitration</td>
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<tr>
<td>April 26-27, 2018</td>
<td>35th Annual Section 1983 Civil Rights Litigation Conference</td>
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<tr>
<td>June 7, 2018</td>
<td>37th Annual Conference on Not-For-Profit Organizations</td>
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<td>Eligible for 6.75 hours of IL MCLE credit</td>
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<tr>
<td>June 12, 2018</td>
<td>Hot Topics in Contemporary Labor Relations Law Conference,</td>
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<td>in cooperation with the NLRB Region 13</td>
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<td>Eligible for 7.0 hours of IL MCLE credit</td>
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WHO SHOULD ATTEND THE FEDERAL TAX INSTITUTE?

• Attorneys
• Accountants
• Corporate Tax Directors & Staff

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

“The highlight of my CLE every year!”
– Previous Attendee
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 during the Federal Tax Institute.

$2,250.00 for Firm Super Ticket, lunch included

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Firm

Address

City

State Zip

Telephone Fax

Email

Administrative contact who is coordinating registrations from your firm

REGISTRANT NAMES

1. ___________________________  □  □
2. ___________________________  □  □
3. ___________________________  □  □
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PAYMENT INFORMATION ON THE FLIP SIDE

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 2018 Pricing (Lunch Included)

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<th>Submitted on or before 4/19/18</th>
<th>Submitted on or before 4/19/18</th>
<th>Submitted after 4/19/18</th>
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REGISTRATION FORM

Prefix Name(s) (please print) Professional Title(s)

Firm/Company/Organization

Address

City, State, Postal Code

Telephone Fax Email

Special Dietary Requirements or Accessibility Needs?

Do You Plan to Attend Lunch? □ Yes □ No

CLE Credit? □ Yes □ No Which State(s)? _________________________

Attorney Registration #

Registration Code (Enter characters appearing on the mailing label. Please enter this ID even if the label is addressed to someone else. Thank you!)

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AMOUNT: $

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  (Make check payable to: Chicago-Kent College of Law)
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HOTEL ACCOMMODATIONS

We have negotiated a special rate for our conference attendees at the following hotel: The Crowne Plaza Chicago Metro is located four blocks from Chicago-Kent in Greektown. The group rate is $169/night plus tax. Reservation can be made online at bit.ly/crowne518 or contacting the hotel directly at (312)829-5000. When registering online enter the group code FDH.

To enjoy this special group rate, reservations must be made by April 25, 2018. Be sure to mention you are attending the 2018 Federal Tax Institute to receive our group rate.

CANCELLATION POLICY

A full tuition refund will be granted if received in writing by April 12, 2018. Tuition, less a 25% cancellation fee will be granted if received between April 13, 2018 and May 10, 2018. No refunds will be granted if received after May 10, 2018, 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.
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Thursday, May 17, 2018

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& 9.5 hrs IL CPE credit