USC Gould School of Law

USC Gould School of Law 2022 Tax Institute

Navigating Taxing Times

REGISTER ONLINE NOW AT: cle.usc.edu/tax
#USCLAWTAX
New Hybrid In-Person/Virtual Event Format

Meet with fellow tax professionals and address the cutting-edge tax issues affecting the industry. This three-day institute includes discussions, networking opportunities, breakouts sessions and workshops led by heavy hitters in the field.

Monday – Corporate Tax Planning

The Institute will begin with a review of recent developments in corporate tax planning. Other sessions will focus on corporate and business tax planning issues. The day ends with a hosted networking reception and evening workshops.

Tuesday – Partnerships, Real Estate, Tax Planning, Ethics & More

The second day will feature three concurrent tracks of programming, focusing on partnerships and real estate, individual tax planning, and tax ethics, compliance and enforcement issues. The day ends with a hosted networking reception and evening workshops.

Wednesday – Estate Planning

The final day will focus on recent developments, changes and current trends impacting estate planners and those who administer estates and trusts. The Institute ends with a hosted networking reception and evening workshops.

Plus! Networking Opportunities

Join speakers, sponsors, planning committee members and other tax professionals at our networking breaks and evening receptions immediately preceding our evening workshops.

Don’t Miss Out – Register Now

REGISTER ONLINE AT cle.usc.edu/tax

Contact Information

USC Gould School of Law
Continuing Legal Education
699 Exposition Boulevard, Suite 326
Los Angeles, CA 90089-0071

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MONDAY – CORPORATE TAX PLANNING

7:30 – 9:00 AM
Check-In and Continental Breakfast

9:00 – 10:10 AM
Recent Developments and Trends in Corporate Taxation Planning

10:10 – 10:30 AM – Networking Break

10:30 – 11:30 AM
Corporate Tax Issues in Recent Deals
Learn about recent interesting and high profile public deals from nationally-known experts as they focus on each transaction’s structural and commercial features and analyze its tax treatment, with particular emphasis on novel tax issues.

11:30 AM – 12:30 PM
Tax Reform

12:30 – 2:00 PM
Edward Kleinbard Lecture Series
Luncheon and Keynote Address
Join Professor Mindy Herzfeld for a special 30-minute luncheon discussion.

AFTERNOON DUAL TRACK PROGRAMMING
TRACK A – CORPORATE A
2:00 – 3:00 PM
A SPAC is Born: SPAC Formation
This panel will explore the key capital markets and tax considerations in forming a SPAC, including selection of the jurisdiction of incorporation, the structuring of Founders shares and warrants and PFIC-related issues for non-US domiciled SPACs.

Gregory N. Kidder
Steptoe & Johnson LLP
Eric Solomon
Steptoe & Johnson LLP
Amanda Pedvin Varma
Steptoe & Johnson LLP

Alexander Lee
Cooley LLP
Lewis R. Steinberg
Managing Director, Head of Structured Solutions
BofA Securities, Inc.

Manal S. Corwin
KPMG LLP
Prof. Mindy Herzfeld
Professor of Practice
University of Florida
Levin College of Law
Eric Solomon
Steptoe & Johnson LLP

Prof. Mindy Herzfeld
Professor of Practice
University of Florida
Levin College of Law

Lauren Angelilli
Cravath, Swaine & Moore LLP
Devon Bodoh
Weil, Gotshal & Manges LLP
Jeff Marks
J.P. Morgan Private Bank
The SPAC Meets its Match: The De-SPAC Transaction
This panel will discuss relevant issues and considerations for a SPAC’s “Initial Business Combination”, colloquially known as the De-SPAC transaction. Issues to be considered include structuring the Initial Business Combination, taxable versus tax-free transactions and the treatment of different types of deal consideration, navigating cross border and potential re-domiciliation issues under the PFIC, Section 367 and anti-inversion rules, and structuring deals with non-C corporation targets using “UP-C” technology.

Christopher Lallo
Ernst & Young LLP
Pardis Zomorodi
Latham & Watkins LLP

4:00 – 4:20 PM – Networking Break

4:20 – 5:20 PM
Selected SPAC Issues – A Deeper Dive into Key Issues
This panel will take a closer look at some advanced issues related to SPAC formation and M+A including PFIC issues, considerations relevant to a domestic SPAC seeking to acquire a non-US target or an offshore SPAC seeking to acquire a US Target, SPACs and tax-free spin-offs under Section 355 and special issues for an S corporation considering a SPAC investment.

Anne Kim
Kirkland & Ellis LLP
David M. Rievman
Skadden, Arps, Slate, Meagher & Flom LLP and Affiliates

4:00 – 4:20 PM – Networking Break

TRACK B – CORPORATE B

Hot Tax Topics for Closely-Held Businesses

Howard Wagner
Crowe LLP

3:00 – 4:00 PM
California State Income Tax Update
California income tax updates, including federal conformity issues, residency and taxation of nonresidents and other developments.

Jiwon Jeong
PwC
Christopher Whitney
PwC

4:00 – 4:20 PM – Networking Break

4:20 – 5:20 PM
Insuring M&A Transactions including Rep and Warranty Insurance

Jessica Harger
Managing Director, M&A and Transaction Solutions
AON
David Smith
O’Melveny and Myers LLP
Marc Yassinger
Platinum Equity

5:20 – 6:00 PM – Networking Reception
MONDAY – CORPORATE TAX PLANNING

6:00 – 7:30 PM
EVENING WORKSHOPS
The following sessions will run concurrently.

Entertainment Industry Tax Update
- Alan J. Epstein
  Willkie Farr & Gallagher LLP
- Michael R. Morris
  Valensi Rose PLC
- Shane Nix
  Willkie Farr & Gallagher LLP
- Rick Rosas
  PwC

Middle Market Bankruptcy Tax
- Glenn Dance
  Holthouse Carlin & Van Trigt LLP
- Elliott G. Freier
  VLP Law Group
- Thomas M. Giordano-Lascari
  Karlin & Peebles, LLP
- Alexander Lee
  Cooley LLP
- Ryan Charles Gaglio
  Stradling Yocca Carlson & Rauth
- Michael Knobler
  Fenwick & West LLP

International Tax Update

Financing Start Ups

continuing education credits

LAWYERS: Minimum Continuing Legal Education (MCLE): USC Gould School of Law, a State Bar of California-approved MCLE provider, certifies that this activity qualifies for MCLE credit in the amount of 23 hours, of which 5.5 hours may apply to legal ethics credit. This event may or may not meet the requirements for continuing legal education in other states. Please check with the bar association or Supreme Court in the state in which you are seeking credit to determine if this event is eligible.

LEGAL SPECIALIZATION: USC Gould School of Law, a State Bar of California-approved Legal Specialization provider, certifies that this activity qualifies for 23 hours of Legal Specialization credit in Taxation Law and 7.25 hours of Legal Specialization credit in Estate Planning, Trust and Probate Law.

ACCOUNTANTS: Continuing Professional Education (CPE): This program meets the guidelines for Continuing Professional Education set by the California State Board of Accountancy in the amount of 25.5 hours.

FINANCIAL PLANNERS: CFP® Professionals: The USC Gould School of Law is a registered CFP Board CE Sponsor. Attendance will be reported electronically following the Institute.

BANKERS AND TRUST OFFICERS: Certified Trust and Financial Advisor (CTFA): ABA Professional Certifications is dedicated to promoting the highest standards of performance and ethics within the financial services industry. USC Gould School of Law 2020 Tax Institute has been approved for CTFA 27.75 credit. This statement is not an endorsement of this program or its sponsor.
<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
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<tbody>
<tr>
<td>7:30 – 9:00 AM</td>
<td>Check-In and Continental Breakfast</td>
</tr>
<tr>
<td>9:00 – 10:00 AM</td>
<td>Recent Developments in Partnership and Real Estate Guidance</td>
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<td></td>
<td>Learn about up-to-the minute legislative, regulatory, and judicial developments in partnership and real estate tax from two of our country’s leading experts.</td>
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<tr>
<td>10:00 – 11:00 AM</td>
<td>Partnership Compensation Issues (Including Carry Reforms)</td>
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<td>This session will first provide an overview and summary of the final regulations. The experienced speakers will discuss the complexities of determining the application of Section 199A in deals and in compliance and the unanswered questions and problems, particularly with respect to real estate and the limitation for the deduction using unadjusted basis of qualified property immediately after acquisition (UBIA).</td>
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<tr>
<td>11:00 – 11:20 AM</td>
<td>Networking Break</td>
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<tr>
<td>11:20 AM – 12:20 PM</td>
<td>State Pass Through Entity (“PTE”) Tax Election Legislation as SALT Cap Workarounds</td>
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<tr>
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<td>This session will explore California’s PTE tax election legislation as a SALT Cap workaround and will contrast California’s legislation with similar legislation in other key states.</td>
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<tr>
<td>12:20 – 2:00 PM</td>
<td>Luncheon and Keynote Address</td>
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<td>Join Natasha Sarin for a special 30-minute luncheon discussion about the current priorities of the U.S. Treasury Department.</td>
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</tbody>
</table>

**Speakers:**

- James Jennings
  - Gibson, Dunn & Crutcher LLP
- Eric B. Sloan
  - Gibson, Dunn & Crutcher LLP
- Glenn Dance
  - Holthouse Carlin & Van Trigt LLP
- Clifford Warren
  - Internal Revenue Service
- Jiwon Jeong
  - PwC
- Ben Luedeke
  - PwC
- Christopher Whitney
  - PwC
- Natasha Sarin
  - Deputy Assistant Secretary for Economic Policy
  - U.S. Treasury Department
AFTERNOON MULTI-TRACK PROGRAMMING

TRACK A
PARTNERSHIPS & REAL ESTATE TAX PLANNING
2:00 – 3:00 PM
Umbrellas Everywhere – Recent UP-C and UP-SPAC Transactions
Ben Applestein
Deloitte LLP
Andrea A. Ramezan-Jackson
Latham & Watkins LLP

3:00 – 4:00 PM
Not Dead Yet – An S Corp Refresher
Jay A. Nathanson
Greensfelder, Hemker & Gale, P.C.
William C. Staley
Law Office of William C. Staley

4:00 – 4:20 PM – Networking Break

4:20 – 5:20 PM
Opportunity Zones & Section 1031
Joyce Welch
Deloitte LLP
Lou Weller
Weller Partners LLP

TRACK B
ETHICS, COMPLIANCE & ENFORCEMENT
2:00 – 3:00 PM
Installment Sales
Garrett Cushing
Senior Vice President, Finance & Operations
Clearlake Capital Group, L.P.
Elaina Kogan
Singer Burke Zimmer & Kogan LLP
Andy Torosyan
Holthouse Carlin & Van Trigt LLP

3:00 – 4:00 PM
Planning for Capital Gains
This panel will focus on structuring transactions to maximize capital gain. Topics will include holding period considerations, capital gain considerations in connection with the sale of intellectual property, substitute for ordinary income doctrine, considerations related to real estate (trade/business vs investment).
Elaina Kogan
Singer Burke Zimmer & Kogan LLP
Shane Nix
Willkie Farr & Gallagher LLP

4:00 – 4:20 PM – Networking Break

4:20 – 5:20 PM
Individual Tax Elections
Pam Drucker
Armanino LLP
Megan L. Jones
Pillsbury Winthrop Shaw Pittman LLP
TUESDAY – PARTNERSHIPS, REAL ESTATE, TAX PLANNING, ETHICS & MORE

TRACK C
INDIVIDUAL TAX PLANNING
2:00 – 3:00 PM

Promoter Investigations; Both Sides of the Table
The IRS has increasingly focused on professionals as enablers of aggressive tax avoidance transactions. Learn how to avoid getting caught up in this increasingly wide net and how to defend clients that do get entangled.

Sandra R. Brown
Hochman Salkin Toscher Perez, P.C.
Lois Dietrich
Acting Director,
Office of Promoter Investigations
Internal Revenue Service
Lydia B. Turanchick
Nardiello and Turanchik LLP

3:00 – 4:00 PM
Tips on Trying a Civil Tax Fraud Case
The IRS New Office on Fraud Enforcement will increase the number of civil fraud penalties asserted against taxpayers. The panel will discuss the Government approach to asserting the penalties and the key ways to defend against them.

Cassidy Collins
Special Trial Counsel, Chief Counsel
Internal Revenue Service
Dennis L. Perez
Hochman Salkin Toscher Perez, P.C

4:00 – 4:20 PM – Networking Break

4:20 – 5:20 PM
Sensitive IRS Examinations and Sensitive Ethical Problems for the Practitioner
IRS Examinations Can not only be trouble for the taxpayer but also for the practitioner. Join our expert panel on what can cause problems for the practitioner and the best practices to avoid them.

Michael J. Desmond
Gibson, Dunn & Crutcher LLP
Sharyn Fisk
Director, Office of Professional Responsibility
Internal Revenue Service

5:20 – 6:00 PM – Networking Reception

upcoming USC Gould School of Law programs

INTELLECTUAL PROPERTY INSTITUTE
March 21-22, 2022
Fairmont Miramar Hotel & Bungalows – Santa Monica, CA

REAL ESTATE LAW AND BUSINESS FORUM
April 7, 2022
Jonathan Club – Los Angeles, CA

Subscribe to our mailing list and receive the latest updates about our programs:
Visit cle.usc.edu for more information.
Partnership and Real Estate Hot Topics: Ask the Experts
Join speakers from the Tuesday daytime sessions as they discuss recent developments in partnership and real estate taxation. Be prepared to ask questions!

Benjamin Applestein
Deloitte LLP
Glenn Dance
Holthouse Carlin & Van Trigt LLP
James Jennings
Gibson Dunn & Crutcher LLP
Eric B. Sloan
Gibson Dunn & Crutcher LLP

6:00 PM – 7:30 PM
EVENING WORKSHOPS
The following sessions will run concurrently.

Cryptocurrency and NFTs
Ryan L. Korner
Special Agent in Charge, Criminal Investigation Division
Internal Revenue Service
Nina Marino
Kaplan Marino
Stephen J. Turanchik
Paul Hastings LLP
Benjamin Applestein
Deloitte LLP
Glenn Dance
Holthouse Carlin & Van Trigt LLP
James Jennings
Gibson Dunn & Crutcher LLP
Eric B. Sloan
Gibson Dunn & Crutcher LLP

Partnership and Real Estate Hot Topics: Ask the Experts
Join speakers from the Tuesday daytime sessions as they discuss recent developments in partnership and real estate taxation. Be prepared to ask questions!

Benjamin Applestein
Deloitte LLP
Glenn Dance
Holthouse Carlin & Van Trigt LLP
James Jennings
Gibson Dunn & Crutcher LLP
Eric B. Sloan
Gibson Dunn & Crutcher LLP

SALT Cap Workarounds and Other Significant California Developments
This evening breakout session will take a closer look at issues related to California’s Pass Through Entity (“PTE”) tax election legislation as well as other California tax developments.

Jiwon Jeong
PwC
Ben Luedeke
PwC
Christopher Whitney
PwC
Chad D. Nardiello
Nardiello Turanchik LLP
Michel Stein
Hochman Salkin Toscher Perez P.C.

The Three Enforcement Cs
(Conservation Easements, Cryptocurrency, Captive Insurance Arrangements)

WEDNESDAY – ESTATE PLANNING

7:30 – 9:00 AM
Check-In and Continental Breakfast

9:00 – 10:30 AM
Recent Developments and Current Trends in Estate Planning
A nationally-known expert will provide an overview of significant changes and developments in the law, impacting estate planners and those who administer estates and trusts.

Keep on top of current trends and developments that will affect all wealth transfer advisors.

Charles A. (“Clary”) Redd
Stinson LLP

10:30 – 10:40 AM – Networking Break
10:40 – 11:40 PM
What is it and Where did it Come From: Foreign Trust Like Structures and What to Do When You Stumble on Them

11:50 – 12:50 PM
Planning with Retained Interests: What Can We do in View of Powell and Moore?"
The planning concerns around transfers with retained interests increased when planners were reminded of the risk created after the transaction under Code §§ 2036(a)(2), 2038(a), and 2703 in the Tax Court decisions of Powell and Cahill. Then, in 2020, the Tax Court in a memorandum decision issued its judgment against the taxpayer in Moore. Although the case was determined under Code § 2036(a)(1), the taxpayer’s failure to establish bona fide sale and several other deficiencies can be instructive to today’s planners. Now two experienced planners with national perspectives will explore aspects of the existing and emerging opportunities to accomplish client objectives within the constructs of trusts, pass through entities, and relationships between human beings. The tools provided for new transactions and adjustments to current plans, with potential tax legislation will be discussed.

12:50 – 2:00 PM
Luncheon and Keynote Address
Join Commissioner Charles P. Rettig for a special 30 minute luncheon discussion about the current priorities and enforcement initiatives of the Internal Revenue Service, including important topics of interest to estate planners.

1:10 – 3:10 PM – Networking Break

3:00 – 3:10 PM
Tax Issues Arising from Silent Trusts
Ms. Rafferty will address the issues that fiduciaries face in navigating tax and financial reporting requirements under federal and international rules, while at the same time satisfying the fiduciary’s obligation to maintain privacy and secrecy provisions of a Silent Trust. This session will explore potential solutions to assist fiduciaries in balancing the inevitable conflict between transparency and privacy during trust administration.
### 4:20 – 5:20 PM
**Dark Side Tales – Watch Your Back: Common Threats to High Net Worth individuals**

High net worth individuals are targets in our society, and the focus on them is only growing. As the IRS promises to increase enforcement efforts on this group, extra care when doing their planning is warranted. The threats to this demographic not only come from government sources but also sadly sometimes from those closest to them, and can include their personal safety. Further, we have all experienced the high net worth client who is their own worst enemy and wants to push aggressive planning past the point of careful planning. This discussion will focus on tax and other planning issues, red flags and solutions for issues common among high net worth clients (and others too).

**Speakers:**
- Megan L. Jones
  - Pillsbury Winthrop Shaw Pittman LLP
- Jennifer McCall
  - Pillsbury Winthrop Shaw Pittman LLP

### 5:20 – 6:00 PM – Networking Reception

### 6:00 – 7:30 PM
**EVENING WORKSHOPS**

**The following sessions will run concurrently.**

#### Hot Topics in Estate and Gift Tax Planning

Join Clary Redd as he discusses hot topics in estate and gift tax planning in a follow-up to his morning session. Bring your questions!

**Speaker:**
- Charles A. (“Clary”) Redd
  - Stinson LLP

#### The Bona Fide Sale Possibilities Examined

The concern of many planners includes how to plan with the ominous risk of IRS attack based on Code § 2036. Recent cases of Moore, Powell, Cahill and others highlight the need, and often absence, of a defensible bona fide sale for adequate and full consideration fact pattern. Please join us for a discussion on the structures, business formations and other fact patterns that can help meet the IRS, Tax Court and District Court standards. Chris Siegle and Carlos Batlle will discuss and share what has worked, what hasn’t, and what could have been.

**Speakers:**
- Carlos Batlle
  - J.P. Morgan Private Bank
- Christopher Siegle
  - J.P. Morgan Private Bank

#### Planning For Family Residences

**International Charitable Giving**

Cross-border philanthropy is popular among individual philanthropists, private foundations, and companies with international footprints. This session focusses on rules and planning opportunities for United States donors and grantmakers to maximize their tax deduction and avoid excise taxes, such as working with U.S. intermediary organizations, donor-advised fund structures, or foreign public charity equivalents. The session will also touch on other requirements that come into play, such as current best practices to address anti-terrorism concerns and special considerations for donating personal property.

**Speakers:**
- Andrew M. Katzenstein
  - Proskauer
- Ingrid Mittermaier
  - Adler & Colvin
- Arthur Rieman
  - The Law firm for Non-Profits, P.C.
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Laura A. Zwicker  
Greenberg Glusker
REGISTRATION
In-person registration includes daily continental breakfast, luncheons, and evening receptions as well as Institute sessions, networking opportunities, exhibitor booths, and continuing education credit.
Virtual registration includes access to the live broadcast of the Institute sessions and available recordings of the on-demand sessions, continuing education credit, and an electronic copy of the Institute syllabus.

LOCATION, ACCOMMODATIONS AND PARKING
The 2022 Tax Institute will be held at the Millennium Biltmore Hotel
Address: 506 South Grand Avenue, Los Angeles, CA 90071
For accommodations, please call the hotel’s reservation number or visit the link provided below to book online. A limited number of rooms are available at a special rate of $215 per night for single or double occupancy. All reservations must be made by Friday, January 7 to take advantage of this special rate.
Reservations: Call 213-612-1575, Monday-Friday between 8 AM and 6 PM. Be sure to mention the USC Tax Institute Conference for our exclusive rate! Click here to make a reservation online.
On-site self-parking is available at the Millennium Biltmore Hotel for $30 per day with validation obtained at Will Call, or $45 per day for overnight hotel guests. Self-parking is also available at Pershing Square for a maximum per day rate of $20 including overnight stays (subject to change, no validation needed).

BADGES
Badges will be held at Will Call from 7:30 AM until 6:00 PM each day. If you choose, your badge can be made transferable. A transferable badge will allow different co-workers to attend consecutive sessions. If a registration is transferable, only the organization name will appear on the badge and only one person per badge may attend any one session.

DIETARY RESTRICTIONS AND SPECIAL ACCESS NEEDS
Email us at cle@law.usc.edu or call (213) 821-3580 for assistance.

DRESS CODE
The dress code for the Institute is business attire.

EXHIBITORS
Please visit our website, cle.usc.edu/tax for information about exhibiting or contact Shejuti Shahriri at (213) 821-8573 with any questions. Exhibitor space is limited, so reserve your space soon!

CANCELLATIONS
All registrations and purchases are final and non-refundable.
registration form

USC GOULD SCHOOL OF LAW 2022 TAX INSTITUTE
MONDAY – WEDNESDAY, JANUARY 24-26, 2022
MILLENNIUM BILTMORE HOTEL, LOS ANGELES, CA

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Occupation/Title: ________________________________________________________________

Organization/Law School: _________________________________________________________

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☐ $1,299  3 Days In-Person ($1,369 after Jan. 7)

☐ $999  3 Days Virtual / On-Demand

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☐ $699  Any 2 Days Virtual / On-Demand

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☐ $589  Any 1 Day In-Person ($639 after Jan. 7)

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☐ $399  Any 1 Day Virtual / On-Demand

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