75TH INSTITUTE ON FEDERAL TAXATION
A YEAR OF INSIGHTS AND ANALYSES FROM AMERICA’S TOP TAX AUTHORITY

OCTOBER 23–28, 2016
GRAND HYATT
NEW YORK, NY

NOVEMBER 13–18, 2016
HOTEL DEL CORONADO
SAN DIEGO, CA

CONFERENCE CO-CHAIRS:
Bryan C. Skarlatos, Esq., Partner
Kostelanetz & Fink, New York, NY

Stephen D. Rose, Esq., Partner
Munger, Tolles & Olson, Los Angeles, CA

FINANCE AND LAW PROGRAMS
LEARNING OBJECTIVES
The Institute on Federal Taxation (IFT) is designed for the practitioner who must frequently anticipate and handle federal tax matters. Nationally recognized experts guide attendees through in-depth general sessions and panel discussions that cover the most advanced tax issues. They offer participants a clear understanding of the key issues affecting their clients or business and present planning ideas that can immediately be used in practice. Just as important, the Institute provides the perfect setting in which to meet practitioners from around the country. It’s an opportunity for you to share ideas, exchange views, learn what others are doing, and obtain credit for continuing education.

WHO SHOULD ATTEND?
The Institute addresses all major areas of taxation and attracts attorneys, both general tax practitioners and specialists; accountants; corporate treasury and compliance executives; tax managers; and financial planners, seeking expert discussion of the latest technical, legislative, and planning developments.
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TOPICS AT A GLANCE

NYUSPS: KEEPING YOU CURRENT ON FEDERAL TAXATION TOPICS
The NYU School of Professional Studies (NYUSPS) Institute on Federal Taxation brings together tax practitioners from around the country to find out about new practices in federal taxation, exchange ideas, and stay on top of the latest tax trends and developments. Learn from America’s leading tax experts in finance, law, and government as they share their extensive knowledge on such topics as executive compensation and employee benefits, trusts and estates, ethics, partnerships and real estate, corporate taxes, and much more. Stay abreast of everything that’s going on in the field by networking with hundreds of taxation professionals. As a premier educational institution, NYU is committed to providing the highest standard of learning for our participants.

CURRENT DEVELOPMENTS
John P. Gimigliano, Esq., Principal-in-Charge of Federal Tax Legislative and Regulatory Services, KPMG, Washington, DC

TAX CONTROVERSIES
Charles P. Rettig, Esq., Principal, Hochman, Salkin, Rettig, Toscher & Perez, PC, Beverly Hills, CA

EXECUTIVE COMPENSATION & EMPLOYEE BENEFITS
Mary B. Hevener, Esq., Partner, Morgan, Lewis & Bockius, Washington, DC

INTERNATIONAL TAX
William B. Sherman, Esq., Partner, Holland & Knight, Fort Lauderdale, FL

HOT TAX TOPICS
William G. Cavanagh, Esq., Partner, Chadbourne & Parke, New York, NY

CORPORATE TAX
Lewis R. Steinberg, Esq., Managing Director; Head of Structured Solutions, Americas Mergers & Acquisitions Group, Bank of America Merrill Lynch, New York, NY
Stephen D. Rose, Esq., Partner, Munger, Tolles & Olson, Los Angeles, CA

EVENING SESSION: FUNDAMENTALS OF PARTNERSHIP AND REAL ESTATE TAXATION
Blake D. Rubin, Esq., Senior Advisor, EY, Washington, DC

PARTNERSHIPS, LLCs, AND REAL ESTATE
Blake D. Rubin, Esq., Senior Advisor, EY, Washington, DC
Andrea M. Whiteway, Esq., Principal, EY, Washington, DC

EVENING SESSION: ETHICS
Stephen M. Breitstone, Esq., Partner, Meltzer, Lippe, Goldstein & Breitstone, Mineola, NY & New York, NY

CLOZELY-HELD BUSINESSES
Jerald David August, Esq., Partner, Kostelanetz & Fink, New York, NY

EVENING SESSION: ETHICS
Bryan C. Skarlatos, Esq., Partner, Kostelanetz & Fink, New York, NY

TRUSTS AND ESTATES
Sanford J. Schlesinger, Esq., Founding Partner, Schlesinger Gannon & Lazetera, New York, NY

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IMPORTANT NOTE: The city that a speaker is presenting in is indicated by NY for New York and by SD for San Diego. When NY or SD does not appear, that speaker is presenting in both cities. NOTE: Start and end times, lunch recesses and refreshment breaks vary from day to day so please consult each day’s schedule for specifics.

For more information, call 212-992-3320. Register online at sps.nyu.edu/ift
DAY 1: SUNDAY, OCT. 23/NOV. 13

10:30 a.m.
**CONTINENTAL BREAKFAST**
Full-Week and Single-Day Registration and Distribution of Materials

10:45 a.m.
**WELCOMING REMARKS**

**CURRENT DEVELOPMENTS**

Chair: John P. Gimigliano, Esq., Principal-in-Charge of Federal Tax Legislative and Regulatory Services, KPMG, Washington, DC

11 a.m.
**LEGISLATIVE UPDATE**
A review of legislation enacted, considered and pending in the current congressional session.
John P. Gimigliano, Esq., Principal-in-Charge of Federal Tax Legislative and Regulatory Services, KPMG, Washington, DC

12:15 p.m.
**THE TREASURY AGENDA**
A review of recently issued and pending Treasury guidance.
Rochelle Hodes, Esq., Associate Tax Legislative Counsel, Office of Tax Policy, US Department of the Treasury, Washington, DC

1:05 p.m.
**REFRESHMENT BREAK**

**TAX CONTROVERSIES**

Chair: Charles P. Rettig, Esq., Principal, Hochman, Salkin, Rettig, Toscher & Perez, PC, Beverly Hills, CA

1:15 p.m.
**FROM THE EXPERTS: IRS REPRESENTATION TOOLS, TECHNIQUES AND DEFENSIVE STRATEGIES – CIVIL & CRIMINAL TAX UPDATE**
Tips from the tax trenches from leading tax controversy practitioners in an open discussion regarding pending IRS enforcement priorities and initiatives including IRS Wealth Squad examinations, options for taxpayers with undisclosed foreign financial accounts and related issues regarding the ongoing IRS Offshore Voluntary Disclosure Program / Streamlined Filing Compliance Procedures re: FBARs and the Swiss Bank Program, the new enforcement environment regarding IRS information document requests, hot topics and enforcement priorities within the IRS Small Business and Self-Employed Operating Division and the IRS Large Business & International Division; IRS Appeals and AJAC resolution strategies; Form 8300 examinations and compliance issues, criminal tax enforcement update (foreign and domestic voluntary disclosures), protecting privileged communications; penalty abatement considerations and recent cases of significance.
Moderator: Charles P. Rettig, Esq., Principal, Hochman, Salkin, Rettig, Toscher & Perez, PC, Beverly Hills, CA
NY & SD: Larry A. Campagna, Esq., Shareholder, Chamberlain, Hrdlicka, White, Williams & Aughtry, Houston, TX
Mark D. Allison, Esq., Member, Caplin & Drysdale, Chartered, New York, NY
Scott D. Michel, Esq., Member, Caplin & Drysdale, Chartered, Washington, DC
SD: Gary L. Howard, CPA, Managing Partner, GL Howard and Company CPAs, Los Alamitos, CA
Samantha Kittle, CPA, Partner, GL Howard and Company CPAs, Los Alamitos, CA
3:45 p.m.
REFRESHMENT BREAK

EXECUTIVE COMPENSATION & EMPLOYEE BENEFITS

Chair: Mary B. Hevener, Esq., Partner, Morgan, Lewis & Bockius, Washington, DC

4 p.m.
STATE AND LOCAL TAX ISSUES FOR MOBILE EMPLOYEES
The increasingly mobile workforce raises significant state and local tax issues for employers as states seek opportunities to raise additional revenue and to expand their taxing jurisdiction. This program provides an update on the state and local tax issues facing employers with traveling and telecommuting employees, including an overview of state payroll tax requirements and audit issues, state nexus requirements for corporate income tax and sales and use tax, an update on currently pending federal legislation impacting these issues, options for remediating historical exposures prior to audit, and practical recommendations for managing exposure and risk on a prospective basis.
William H. Gorrod, Esq., Shareholder, Greenberg Traurig, San Francisco, CA

5 p.m.
TRENDING FRINGE BENEFITS PAYROLL TAX ISSUES: EMPLOYER-PROVIDED MEALS, DE MINIMIS FRINGS, PER DIEMS, AND PENALTIES
After concluding the initial round of “National Research Program” audits, the IRS continues to target a wide range of fringe benefits employers provide to employees, focusing most frequently on workforce-wide benefits with potential for multi-million dollar payroll tax adjustments, even for small employers. This program surveys the applicable legal standards, IRS positions, taxpayer responses, and procedural considerations during both the audit and litigation stages of several commonly audited payroll tax issues.
Steven P. Johnson, Esq., Associate, Morgan, Lewis & Bockius, Washington, DC
Mary B. Hevener, Esq., Partner, Morgan, Lewis & Bockius, Washington, DC

6:30 p.m.
RECESS
**CONTINENTAL BREAKFAST**
Single-Day Registration and Distribution of Materials

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**8:25 a.m.**
**INTRODUCTORY REMARKS**

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**INTERNATIONAL TAX**

*Chair: William B. Sherman, Esq., Partner, Holland & Knight, Fort Lauderdale, FL*

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**8:30 a.m.**
**WHY DO US TAXPAYERS HAVE EARNINGS TRAPPED OFFSHORE? AN EXPLORATION OF SECTION 956**

This panel discusses how the controlled foreign corporation rules of Subpart F cause US taxpayers to have earnings trapped offshore. It delves into key repatriation related topics, including how Section 956 operates and taxpayer efforts to work around Section 956, including return of basis and other planning techniques.

*NY & SD: Sam K. Kaywood, Esq., Partner, Alston & Bird, Atlanta, GA*

*Devon M. Bodoh, Esq., Principal, KPMG, Washington, DC*

*NY: William S. Dixon, Esq., Managing Director, Mergers and Acquisitions, Citigroup Global Markets, New York, NY*

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**10 a.m.**
**REFRESHMENT BREAK**

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**10:15 a.m.**
**EARNINGS STRIPPING – THE USE OF DEBT IN CROSS-BORDER TAX PLANNING**

Tax planners have long relied on debt as a key tool to minimize double taxation and allow efficient repatriation of profits. However, related party debt is under attack from multiple sources, most notably the OECD’s BEPS initiative and Treasury’s proposed Section 385 regulations. This program explores the use of debt in light of these new proposed limitations as well as other limitations on deductibility, including the earnings stripping rules.

*NY & SD: Jason S. Bazar, Esq., Partner, Mayer Brown, New York, NY*

*NY: David G. Shapiro, Esq., Partner, Saul Ewing, Philadelphia, PA*

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**12 p.m.**
**LUNCH RECESS**

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**1:15 p.m.**
**“HIDING THE BALL” – ANONYMITY, TAX LAW AND THE US AS THE WORLD’S FAVORITE NEW TAX HAVEN**

This session reviews recent developments in the US (and the world) relating to the laws, both enacted and proposed, concerning taxpayers’ continuing attempts to shield knowledge of their ownership of foreign assets from relevant tax authorities. Ranging from the US enactment of FATCA and the OECD’s Common Reporting Standard to other recent US governmental efforts to require disclosure of beneficial ownership of entities, it is increasingly difficult for taxpayers to maintain anonymity. But (perhaps surprisingly), in a world of increasing transparency, it is the United States that has been crowned as “the world’s favorite new tax haven.” And in this brave new world, it is increasingly important for US professionals to understand what to look for in order to avoid being complicit in any potential illegal activities.

*NY & SD: Sarah E. Paul, Esq., Assistant United States Attorney, United States Attorney’s Office, Southern District of New York, New York, NY*

*NY: Leonard Schneidman, Esq., Managing Director, Andersen Tax, Boston, MA*

*SD: Alan I. Appel, Esq., Professor of Law, New York Law School, New York, NY*
2:35 p.m.
REFRESHMENT BREAK

HOT TAX TOPICS

Chair: William G. Cavanagh, Esq., Partner, Chadbourne & Parke, New York, NY

2:45 p.m.
HOT TAX TOPICS
A fast-paced survey of important but lesser-publicized hot federal and state tax planning and tax litigation issues including: mergers and acquisition issues; state corporate income and sales tax nexus; income, deduction and capitalization issues; tax-exempt organizations; foreign tax issues; and tax controversy strategy tips.
William G. Cavanagh, Esq., Partner, Chadbourne & Parke, New York, NY

5 p.m.
RECESS

NETWORKING RECEPTION

5 p.m.
It’s never been more valuable or vital to connect with colleagues at NYU’s annual reception. Please be our guest for cocktails and hors d’oeuvres and take the opportunity to meet and greet our distinguished speakers, sponsors, and advisory board members. Also, enjoy this time to meet and network with fellow tax professionals from around the country.
DAY 3: TUESDAY, OCT. 25/NOV. 15

8 a.m.
CONTINENTAL BREAKFAST
Single-Day Registration and Distribution of Materials

8:25 a.m.
INTRODUCTORY REMARKS

CORPORATE TAX

Co-Chairs: Lewis R. Steinberg, Esq., Managing Director; Head of Structured Solutions, Americas Mergers & Acquisitions Group, Bank of America Merrill Lynch, New York, NY
Stephen D. Rose, Esq., Partner, Munger, Tolles & Olson, Los Angeles, CA

8:30 a.m.
REIT M&A
A discussion of strategies, techniques and developments in REIT M&A, including OP unit transactions, acquisitions and dispositions involving UPREITs, C corp acquisitions and dispositions of REITs, C corp REIT conversions and recent law changes regarding tax-free spin-offs involving REITs.
David M. Rievman, Esq., Partner, Skadden, Arps, Slate, Meagher & Flom, New York, NY
Sarah E. Ralph, Esq., Partner, Skadden, Arps, Slate, Meagher & Flom, Chicago, IL

9:45 a.m.
REFRESHMENT BREAK
10 a.m.
**HOT AUDIT/CONTROVERSY ISSUES**
This session covers a range of topics relating to the IRS and how to handle an IRS controversy. Current IRS exam and appeals initiatives, as well as creative ways to resolve your IRS controversies, are covered. The session explores how the various IRS programs operate, how to approach resolution of your exam, and what you should consider for your clients.

**NY & SD:** Mark D. Allison, Esq., Partner, Caplin & Drysdale, Chartered, New York, NY
Sheldon M. Kay, Esq., CPA, Principal-in-Charge of Washington National Tax, Crowe Horwath, Washington, DC

**NY:**
Sharon Katz-Pearlman, Esq., National Principal-in-Charge, Tax Controversy Services, KPMG, New York, NY; Global Head, Tax Dispute Resolution and Controversy, KPMG International

**SD:**
Erin M. Collins, Esq., Tax Managing Director, Tax Controversy Services, KPMG, Los Angeles, CA

11:30 a.m.
**VALUATION ISSUES IN M&A**
This exciting and fast-paced presentation explores a broad array of issues specifically relevant to middle-market companies in the $20 million to $100 million range. While it discusses major valuation issues such as the (h)(10) election, it also addresses other, less talked about, critical issues such as personal goodwill, contingent payments, and pre-deal estate planning.

Lance S. Hall, ASA, President and Co-Founder, FMV Opinions, New York, NY

12:30 p.m.
**LUNCH RECESS**

1:45 p.m.
**STATE AND LOCAL TAX ASPECTS OF MERGERS AND ACQUISITIONS**
This presentation discusses a variety of state and local tax issues encountered in merger and acquisition transactions, focusing primarily on federal/state corporate tax differences, such as business/nonbusiness treatment for gains and losses, differing recognition rules, return filing differences (federal consolidated versus separate or unitary state filings), special state taxes, "due diligence" concerns, allocation and apportionment issues, net operating losses and more.

Christopher A. Whitney, CPA, Partner, PricewaterhouseCoopers, Irvine, CA
Kenneth S. Lee, CPA, Partner, PricewaterhouseCoopers, San Francisco, CA

3 p.m.
**REFRESHMENT BREAK**

3:15 p.m.
**HOT CORPORATE TAX TOPICS**
This panel discusses recent legislative, regulatory and judicial developments in corporate tax. The speakers focus on topics that present planning opportunities, as well as those that may be traps for the unwary.

**NY & SD:**
Eric Solomon, Esq., National Tax Co-Director, EY, Washington, DC
Joseph M. Pari, Esq., National Principal-in-Charge, KPMG, Washington, DC
Mark J. Silverman, Esq., Partner, Steptoe & Johnson, Washington, DC
Alexander M. Lee, Esq., Partner, Paul Hastings, Los Angeles, CA
Laurence J. Stein, Esq., Partner, Latham & Watkins, Los Angeles, CA

5 p.m.
**RECESS**
EVENING SESSION

5:15–6:55 p.m.
FUNDAMENTALS OF PARTNERSHIP AND REAL ESTATE TAXATION
This session provides useful background that is helpful for attendees who do not have extensive experience in the taxation of partnerships and real estate.
Blake D. Rubin, Esq., Senior Advisor, EY, Washington, DC

DAY 4: WEDNESDAY, OCT. 26/NOV. 16

8 a.m.
CONTINENTAL BREAKFAST
Single-Day Registration and Distribution of Materials

8:25 a.m.
INTRODUCTORY REMARKS

PARTNERSHIPS, LLCs, AND REAL ESTATE

Co-Chairs: Blake D. Rubin, Esq., Senior Advisor, EY, Washington, DC
Andrea M. Whiteway, Esq., Principal, EY, Washington, DC

8:30 a.m.
HOT TOPICS IN PARTNERSHIP AND REAL ESTATE TAXATION: THE GOVERNMENT PERSPECTIVE
An overview of recent and pending developments in partnership and real estate taxation from the government perspective. An opportunity to hear first-hand the views of two key government officials about what’s important, why it’s important, and what the government is doing about it.
Ossie Borosh, Esq., Senior Counsel, US Department of the Treasury, Washington, DC
Curtis G. Wilson, Esq., Associate Chief Counsel (Passthroughs & Special Industries), Internal Revenue Service, Washington, DC
Blake D. Rubin, Esq., Senior Advisor, EY, Washington, DC

9:15 a.m.
RECENT DEVELOPMENTS
The Top 10 recent developments affecting partnership and real estate transactions. An up-to-the-minute discussion from one of the nation’s leading practitioners.
Blake D. Rubin, Esq., Senior Advisor, EY, Washington, DC

10:15 a.m.
REFRESHMENT BREAK

10:30 a.m.
STRUCTURING PARTNERSHIP EQUITY BASED COMPENSATION, INCLUDING THE NEW DISGUISED FEE AND PARTNER/EMPLOYEE DUAL STATUS REGULATIONS
Profits interests, options and other partnership equity based compensation; impact of the new disguised fee (management fee waiver) regulations; handling partner employment arrangements in light of the new partner/employee dual status regulations.
Elizabeth E. Drigotas, Esq., Principal, Deloitte Tax, Washington, DC
Bahar A. Schippel, Esq., Partner, Snell & Wilmer, Phoenix, AZ
11:30 a.m.
PARTNERSHIP LIABILITY ALLOCATION PLANNING, INCLUDING THE NEW PROPOSED REGULATIONS
New proposed regulations under Section 752 would dramatically tighten the rules in this critical area and may trigger gains for many taxpayers with negative capital accounts. Hear the latest on cutting-edge planning techniques under the existing rules, what to do about the pending new rules, and how to deal with any new regulations in the area issued by the time of the conference.
Andrea M. Whiteway, Esq., Principal, EY, Washington, DC

12:30 p.m.
LUNCH RECESS

1:45 p.m.
TURN AND FACE THE STRAIN: ISSUES AND OPPORTUNITIES IN CHANGING FROM DISREGARDED ENTITY TO PARTNERSHIP STATUS AND VICE VERSA AND PARTNERSHIPS CONTINUATIONS
When an interest in a single owner limited liability company that is a disregarded entity is sold, it becomes a partnership for tax purposes. When all interests in a limited liability taxable as a partnership are acquired by the same person, it becomes a disregarded entity. Lurking inside these commonplace transactions are unanswered questions, potential pitfalls and planning opportunities.
NY & SD: Eric B. Sloan, Esq., Partner, Gibson, Dunn & Crutcher, New York, NY
NY: Michael Q. Cannon, Esq., Associate, Gibson, Dunn & Crutcher, Dallas, TX
SD: Victor Lee, Esq., Associate, Gibson, Dunn & Crutcher, Los Angeles, CA

2:45 p.m.
NEW PARTNERSHIP AUDIT RULES: WHAT YOU NEED TO KNOW AND DO NOW
Dramatic changes in the partnership audit rules can allow the IRS to collect tax deficiencies from the partnership entity rather than from the partners, beginning with the 2018 tax year. Even practitioners who do not focus primarily on tax controversy or litigation need to have a basic understanding of the new rules. Learn what you need to know and do now to get ready for the brave new world.
Miriam L. Fisher, Esq., Global Chair of Tax Controversy, Latham & Watkins, Washington, DC
Donald B. Susswein, Esq., Principal, RSM US, Washington, DC

3:45 p.m.
REFRESHMENT BREAK
4 p.m.
HOT LIKE-KIND EXCHANGE ISSUES
Related party exchanges; build-to-suits, reverse exchanges and parking arrangements within and outside the safe harbor; exchanges involving partnerships and trusts; exchanges of property into and out of foreclosure; recent developments on what constitutes “like-kind”; and other current issues including legislative outlook.
NY: Howard J. Levine, Esq., Partner, Roberts & Holland, Washington, DC
SD: Mary B. Foster, Esq., President, 1031 Services, Bellevue, WA

5 p.m.
RECESS

EVENING SESSION

5:15–6:55 p.m.
BUSINESS SUCCESSION PLANNING – PRACTICAL TAX, FINANCIAL AND ETHICAL CONSIDERATIONS
Succession planning is at the heart of the longevity of a business. This workshop exposes common mistakes and pitfalls that can undermine a succession plan. The panel discusses practical approaches to this difficult topic as well as the many tax and ethical considerations that must be taken into account in developing a viable plan.
Moderator: Stephen M. Breitstone, Esq., Partner, Meltzer, Lippe, Goldstein & Breitstone, Mineola, NY and New York, NY
NY: Avi Z. Kestenbaum, Esq., Partner, Meltzer, Lippe, Goldstein & Breitstone, Mineola, NY and New York, NY
Mary P. O’Reilly, Esq., Partner, Meltzer, Lippe, Goldstein & Breitstone, Mineola, NY and New York, NY
SD: Jerome M. Hesch, Esq., Adjunct Professor of Law, University of Miami School of Law, Miami, FL

For more information, call 212-992-3320. Register online at sps.nyu.edu/ift
DAY 5: THURSDAY, OCT. 27/NOV. 17

8 a.m.  CONTINENTAL BREAKFAST
Single-Day Registration and Distribution of Materials

8:25 a.m.  INTRODUCTORY REMARKS

CLOSELY HELD BUSINESSES

Chair: Jerald David August, Esq.  Partner, Kostelanetz & Fink, New York, NY

8:30 a.m.  PLANNING FOR AND DEFENDING CONSERVATION EASEMENTS IN AN ADVERSE IRS ENVIRONMENT
Section 170(h), relating to the deductibility of conservation easements, a seemingly innocuous charitable deduction provision in the Internal Revenue Code, has become a hot button issue for tax advisers, the IRS and taxpayers who take advantage of conservation easements. What was once a sleepy, little known area, where a number of different tax concepts intersect, conservation easements have become the focus of intense IRS scrutiny. In spite of such high level IRS scrutiny, and because of the significant tax benefits that can be enjoyed from the granting of conservation easements, tax advisers for high net-worth individuals and closely-held business owners (and others) have been forced to get acquainted with this area of the law that is filled with traps and land mines. This program provides an overview of how conservation easements work, the main tax and valuation issues that have to be addressed, and how the IRS’s coordinated approach to auditing and attacking conservation easements has changed over time and become one of the IRS’s hot-button issues.
Ronald A. Levitt, Esq.  Shareholder, Sirote & Permutt, PC, Birmingham, AL

9:30 a.m.  REFRESHMENT BREAK

9:45 a.m.  ENTITY CLASSIFICATION – ANOTHER LOOK AT THE CHECK-THE-BOX REGULATIONS
The speaker explores entity classification under the check-the-box regulations, including recent developments, flexibility and planning opportunities created by the regulations, traps that exist for the unwary and practical tax practitioner guidance.
Larry J. Brant, Esq.  Shareholder, Garvey Schubert Barer, Portland, OR

10:50 a.m.  CHOICE OF ENTITY REVISITED – 2016 AND BEYOND
A topical discussion of considerations in selecting the most advantageous choice of entity for specific applications, including the operating business, the professional practice, private equity investments, ownership of real estate, structuring parent subsidiary arrangements (LLC vs QSub, LLC vs corporate subsidiary of C corp), planning for conversions from one form to another, and identification of traps to avoid.
C. Wells Hall, III, Esq.  Partner, Nelson Mullins Riley & Scarborough, Charlotte, NC
Stephen R. Looney, Esq.  Shareholder, Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, PA, Orlando, FL

12 p.m.  LUNCH RECESS

For more information, call 212-992-3320. Register online at sps.nyu.edu/ift
1:15 p.m.  
**REPEAL OF TEFRA ENTITY LEVEL AUDIT RULES**

The TEFRA partnership audit rules were recently repealed by Congress and replaced with new partnership audit rules affecting all partnerships. The new rules make wide-sweeping reforms in the audit of partnerships and LLCs, as well as the assessment and collection of tax. For large partnerships, the IRS may assess prior years’ understatements in tax directly against the partnership unless it elects to “push-down” the taxes owed to the partners.

**Jerald David August, Esq.,** Partner, Kostelanetz & Fink, New York, NY  
**Terence F. Cuff, Esq.,** Of Counsel, Loeb & Loeb, Los Angeles, CA

2:30 p.m.  
**REFRESHMENT BREAK**

2:45 p.m.  
**CROSS-BORDER PARTNERSHIP STRUCTURES**

The presenters discuss the use of partnerships in cross-border transactions to obtain tax efficiencies that may not be available through corporate structures. They also discuss recent changes in the tax law that eliminate benefits that were previously available.

**Robert W. Phillpott, Esq.,** Partner, Norton Rose Fulbright US, Houston, TX  
**Stephen A. Kuntz, Esq.,** Partner, Norton Rose Fulbright US, Houston, TX

3:45 p.m.  
**AN UPDATE AND REFRESHER ON TAX REPORTING FOR CROSS-BORDER TRANSACTIONS – FORMS, PENALTIES, STATUTE OF LIMITATIONS, POSSIBLE DEFENSES**

A refresher course on the international tax reporting requirements relevant to US persons engaged in cross-border transactions. Foreign information returns discussed include Forms 926, 3520/3520-A, 5471, 5472, 8898, 8865, 8621, 8938, and FinCEN Form 114 (FBAR). The discussion focuses upon proper execution of the Forms, potential penalties for noncompliance, statute of limitations issues, and possible defenses to penalty imposition. In addition, recent IRS International Practice Units (IPUs) addressing foreign information reporting are examined.

**Mark C. Peltz, Esq.,** Principal, WeiserMazars, New York, NY  
**Jennifer L. Sklar-Romano, Esq.,** Tax Director, WeiserMazars, New York, NY

5 p.m.  
**RECESS**
OCTOBER 23–28, 2016
GRAND HYATT NEW YORK
NEW YORK, NY
NOVEMBER 13–18, 2016
HOTEL DEL CORONADO
SAN DIEGO, CA

EVENING SESSION

5:15–6:55 p.m.
ETHICAL AND PENALTY ISSUES FOR TAX PRACTITIONERS: WHEN GOOD TAX PLANNING TURNS BAD
The tax law is complicated and the right answer is not always clear. How sure do you have to be before you can tell a client it is okay to take a deduction, exclude income or characterize income as capital gain? Can a taxpayer filing a return advance any reasonably arguable position? What are the tax practitioner’s duties with respect to the accuracy of the taxpayer’s tax return? How does the IRS police the accuracy of tax returns and when do penalties apply? This panel discusses real-world situations to illustrate the ethical and penalty standards that apply to taxpayers and tax return preparers in every day practice.

Chair: Bryan C. Skarlatos, Esq., Partner, Kostelanetz & Fink, New York, NY
NY: Timothy J. McCormally, Esq., Director, KPMG, Washington, DC
Christopher S. Rizek, Esq., Member, Caplin & Drysdale, Chartered, Washington, DC
SD: Michael J. Desmond, Esq., The Law Offices of Michael J. Desmond, APC, Santa Barbara, CA
Eric J. Kodesch, Esq., Partner, Stoel Rives, Portland, OR

DAY 6: FRIDAY, OCT. 28/NOV. 18

8 a.m.
CONTINENTAL BREAKFAST
Single-Day Registration and Distribution of Materials

8:25 a.m.
INTRODUCTORY REMARKS

TRUSTS & ESTATES

Chair: Sanford J. Schlesinger, Esq., Founding Partner, Schlesinger Gannon & Lazetera, New York, NY

8:30 a.m.
CURRENT DEVELOPMENTS IN TRANSFER TAXATION
Mr. Schlesinger reviews current developments regarding estate planning and federal and state transfer taxation, including the Internal Revenue Service’s final regulations regarding portability, the new income tax basis consistency requirements under the Surface Transportation and Veterans Health Care Choice Improvement Act of 2015, the Service’s new rules regarding the issuance of estate tax closing letters, and Connecticut’s new estate tax cap and new probate fee schedule. Mr. Schlesinger also discusses drafting estate planning documents to comply with and take advantage of current transfer tax laws, and transfer tax vs. income tax basis planning. The program also includes a review of the transfer tax and related income tax proposals in the Obama Administration’s fiscal year 2017 Greenbook and of the presidential candidates, and how they would affect estate and tax planning decisions if enacted.

Sanford J. Schlesinger, Esq., Founding Partner, Schlesinger Gannon & Lazetera, New York, NY

9:30 a.m.
LOVE IT OR LEAVE IT: FIXING, CHANGING OR TERMINATING YOUR IRREVOCABLE TRUST
Ms. Smith discusses various techniques for fixing or revising existing irrevocable trusts which may be defective or which may no longer serve the client’s objectives, or to address a change in circumstances. These techniques include judicial and non-judicial modification of the trust, dividing the trust into two or more separate trusts, decanting the trust, changing the trust’s situs, and reforming the trust. Ms. Smith also discusses various types of transactions involving trusts to accomplish the client’s purposes, including loans between trusts, distributions from the trust, merging trusts, and the purchase of trust assets, as well as the transfer tax consequences and the applicable fiduciary duties of each type of transaction.

Yoshimi O. Smith, Esq., Co-Founding Partner, Beller Smith, PL, Boca Raton, FL

For more information, call 212-992-3320. Register online at sps.nyu.edu/ift
10:30 a.m.
REFRESHMENT BREAK

10:45 a.m.
CARE AND FEEDING OF THE ACRONYMS – THE FUNDING, ADMINISTERING, REPORTING AND REPAIRING OF GRATs, QPRTs AND IDGT SALES
This session examines how to properly fund and administer GRATs, QPRTs and IDGT sales. Mr. Nostro discusses the proper reporting of GRAT and QPRT funding on gift tax returns, reviews the IRS adequate disclosure rules for IDGT sales and provides guidance regarding income tax reporting and related tax compliance issues. He also reviews how to “immunize” GRATs, refinance IDGT notes and ways to reacquire low tax basis assets held in GRATs and QPRTs. The presentation also examines how to recognize and repair defective and poorly-administered GRATs.
Louis Nostro, Esq., Founding Partner, Nostro Jones, PA, Miami, FL

12 p.m.
LUNCH RECESS

1:15 p.m.
A REVIEW OF THE LANDSCAPE OF THE FEDERAL AND STATE INCOME TAXATION OF NON-GRANTOR TRUSTS
Ms. Chomakos discusses the provisions of the Internal Revenue Code that are applicable to the Federal income taxation of non-grantor trusts and their beneficiaries, and planning techniques to achieve income tax savings for the trusts and their beneficiaries. She also discusses state income taxation of non-grantor trusts, and how to determine which state or states will subject a trust and its beneficiaries to state income taxation on a trust’s income.
Andrea C. Chomakos, Esq., Partner, McGuireWoods, Charlotte, NC

2:15 p.m.
REFRESHMENT BREAK

2:30 p.m.
A FINANCIAL ANALYSIS OF THE INCOME TAX AND TRANSFER TAX TREATMENT OF CHARITABLE LEAD TRUSTS AND CHARITABLE REMAINDER TRUSTS
The session explores income tax planning for charitable lead trusts and charitable remainder trusts, and presents financial illustrations of the benefits resulting from these planning techniques. The speakers also discuss how the income tax and estate tax benefits of charitable remainder trusts can be increased by the use of life insurance.
NY: Seth Kaplan, Esq., Shareholder, Gunster, Boca Raton, FL
SD: Jerome M. Hesch, Esq., Adjunct Professor of Law, University of Miami School of Law, Miami, FL

3:30 p.m.
THE ARTHUR D. SEDERBAUM MEMORIAL LECTURE
FAMILY LIMITED PARTNERSHIPS AND OTHER CLOSELY-HELD ENTITIES: THE CONTINUING SAGA
As the courts continue to decide valuation and closely-held entity cases, and the IRS seeks to limit the transfer tax benefit of these entities, the current valuation trends are analyzed and significant new developments are discussed. The panelists provide guidance for creating, implementing and preserving the successful closely-held entity. The panelists also discuss Treasury’s proposed Section 2704 regulations, their impact on current and future planning, defined value clauses, and other relevant issues.
NY & SD: Sanford J. Schlesinger, Esq., Founding Partner, Schlesinger Gannon & Lazetera, New York, NY
NY: John W. Porter, Esq., Partner, Baker Botts, Houston, TX
Seth Kaplan, Esq., Shareholder, Gunster, Boca Raton, FL
SD: Keri D. Brown, Esq., Partner, Baker Botts, Houston, TX
Jerome M. Hesch, Esq., Adjunct Professor of Law, University of Miami School of Law, Miami, FL

4:30 p.m.
RECESS
FULL-WEEK CONFERENCE FEES AND DISCOUNTS
The full-week conference fee includes tuition, continental breakfast, networking reception on Monday evening, refreshment breaks, and one set of course materials on a USB flash drive. A Full-Week Individual Registration is $2,120 for all six days. If you register before October 4, you will qualify for the 15% Early-Bird, Full-Week Registration Discount ($1,802). If two or more individuals register from the same firm at the same time, each person qualifies for the 20% Full-Week Team Discount ($1,696 each). If you are a full-time government official or a full-time university professor, you receive a 15% discount off a full-week registration ($1,802). If you are a solo practitioner, work for a firm with fewer than five professionals, or work for a nonprofit organization, you receive a 15% discount off a full-week registration ($1,802).

Note: Promotion and discount codes, as well as team discounts, must be applied at the time of registration. Discounts cannot be combined or applied retroactively to existing registrations.

You may register online, by mail, or onsite at the conference. We can only accept credit card payments through the online payment portal. We do not accept faxed registrations or wire transfers as a form of payment. Full and partial waivers of the conference fee, based upon financial need are available as well. To request an application, please call 212-992-3320 or email sps.tax@nyu.edu. To register online for the 20% Full-Week Team Discount, please call 212-992-3320 or email sps.tax@nyu.edu for a special discount code. To qualify, the team must be from the same firm and must register together. Each team member must register. Team discounts must be applied at the time of registration. Discounts cannot be combined or applied retroactively to existing registrations. After October 4, to register online for the 15% Full-Week full-time government official, full-time university professor, solo practitioner, nonprofit, or small firm discount, please call 212-992-3320 or email sps.tax@nyu.edu for a special discount code.

To register by mail, complete the registration form and return it with a check or money order made payable to New York University. All registrations sent by mail must be received by 12 p.m. on Thursday, October 20, 2016 (Eastern Standard Time) for New York and by 12 p.m. on Thursday, November 10, 2016 (Eastern Standard Time) for California. To register onsite, you may pay with a check, a money order, or a credit card. To pay by credit card, all walk-ins will be required to self-register at available kiosks. For faster service, conference attendees should plan to register in advance online at sps.nyu.edu/ift. To register onsite, visit the NYU Registration Desk at the Institute beginning at 10:30 a.m. on Sunday or 8 a.m. Monday-Friday.

SINGLE-DAY REGISTRATION FEE
The single-day conference fee of $595 includes tuition for one day of sessions, an evening session (if applicable) for the selected day, continental breakfast, refreshment breaks, and one set of course materials on a USB flash drive for the day of attendance.

MULTI-DAY REGISTRATION FEES
The 2-Day, 3-Day, 4-Day, and 5-Day conference fees include tuition for sessions on the days selected, evening sessions (if applicable) for the selected days, continental breakfast, refreshment breaks, and one set of course materials on a USB flash drive for the days of attendance. The 2-Day fee is $1,075; 3-Day is $1,395; 4-Day is $1,675; and 5-Day is $1,795.

HALF-DAY REGISTRATION FEE
The half-day conference fee of $350 includes tuition for a half-day of sessions, refreshment breaks, and one set of course materials on a USB flash drive for the half-day of attendance.

EVENING SESSION REGISTRATION FEE
The Evening Session conference fee of $125 includes tuition for one evening session on Tuesday, Wednesday, or Thursday evening and a set of the written materials for the evening session. Evening session registration is included in the purchase of a daytime registration, as described above.

CORPORATE GROUP DISCOUNTS
We recognize that your organization may not be able to afford the time and the expense of sending all of its employees to the 75th IFT for the entire week. To accommodate those organizations that wish to send large groups to attend a sampling of sessions, we offer a special Corporate Group Rate for five or more attendees. Please take advantage of this option. Remember, shared registrations are not permitted (i.e. you may not register a firm or a single member of a firm and pass along a single badge). Only registered attendees are eligible to receive continuing education credits. We want all of our attendees to benefit from a simple and efficient registration process. For more details, please call Kathleen Costello at 212-992-3320 or email sps.tax@nyu.edu.
PRESS BADGES
If your publication plans to cover the NYU 75th Institute on Federal Taxation, please email coverage strategy and press credentials to sps.press@nyu.edu.

ELECTRONIC CONFIRMATION
An automated email confirmation will be sent to the email address provided to NYUSPS at the time of registration. Please use an individual email address for each registrant. If a confirmation is not received within two days of online registration submission (allow one–two weeks for registrations sent by mail), please email sps.tax@nyu.edu to request a duplicate copy. Note: Confirmations may display the start and the end dates of the ENTIRE Institute; please check the conference agenda for individual dates and times.

CANCELLATION AND SUBSTITUTION POLICY
A written request for cancellation must be emailed to sps.tax@nyu.edu to the attention of: Conference Administration. If your request is received by October 7 for New York or by October 28 for San Diego, you will receive a 100% tuition refund less a $250 cancellation fee. Due to financial obligations incurred by NYUSPS, there are no refunds available during the two weeks prior to the conference. We are not able to arrange cancellation exceptions or to accept onsite cancellations. If you are unable to attend the Institute but would like to send someone in your place, please send written notification by email to sps.tax@nyu.edu no later than October 20 for New York or November 10 for San Diego.

NEW YORK CONFERENCE LOCATION AND HOTEL ACCOMMODATIONS
The Grand Hyatt New York is conveniently located in midtown Manhattan on Park Avenue at Grand Central Station. It is a short walk to nearby Broadway theatres, Fifth Avenue shopping, Times Square, and major museums. To provide a quality Institute at the best possible cost, NYU has negotiated special room rates and has committed to a block of rooms at the Grand Hyatt New York. We ask you to support NYU by reserving your sleeping accommodations within the room block. Your support allows us to keep our registration fees reasonable. Single or double occupancy rooms are available at the Grand Hyatt at the NYU group rate of $399. The Grand Hyatt has a limited number of rooms with two double beds. If you require a double room, please make your reservation as soon as possible. To make your reservation, call 888-421-1442 and identify yourself as attending the NYU tax conference. New York City is one of the most popular destinations for fall travel. We urge you to make your hotel and travel plans early to avoid disappointment. Hotel rooms can sell out prior to the cut-off date. These rooms will be held as a block, unless exhausted, until September 30, at which time they will be released to the general public.

SAN DIEGO CONFERENCE LOCATION AND HOTEL ACCOMMODATIONS
The Hotel del Coronado, a national landmark, is one of the largest beach resorts on the North American Pacific Coast and is situated conveniently near the San Diego Zoo and Sea World. To provide a quality Institute at the best possible cost NYU has negotiated special room rates and has committed to a block of rooms at the Hotel del Coronado. We ask you to support NYU by reserving your sleeping accommodations within the room block. Your support allows us to keep our registration fees reasonable. Single or double occupancy rooms are available at the Hotel del Coronado at the NYU group rate of $267 by calling 800-468-3533. Resort rooms at $306 and Premier rooms at $369 also are available. In addition to the rates set forth above, the Hotel del Coronado has a daily resort fee of $25 per room, per night charge that covers a number of hotel services and amenities that would customarily be charged to each guest individually. Book your reservation in advance. Hotel rooms can sell out prior to the cut-off date. These rooms will be held as a block, unless exhausted, until October 20, at which time they will be released to the general public.

SPECIAL NEEDS
Any participant who has special needs, (physical, etc.) is encouraged to email sps.tax@nyu.edu or to call the NYU School of Professional Studies Department of Finance and Law Programs at 212-992-3320 at least two weeks prior to the conference start date to indicate their particular requirement.

CONFERENCE CHECK-IN AND COURSE MATERIALS PICK-UP
The NYU Institute on Federal Taxation Registration Desk will open, and materials will be available, beginning at 10:30 a.m. on Sunday. The Institute Registration Desk will open at 8 a.m. Monday through Friday. Proper photo identification is required for badge retrieval. One set of conference materials on a USB flash drive per paid registrant is provided at time of badging. Badges must be displayed in all public spaces throughout the conference.
CONFERENCE MATERIALS
Course materials are provided for each day of the Institute for which you are registered. Included in the conference fee, registrants will receive a USB flash drive at the time of check-in containing the materials for the day(s) of attendance. In addition, registrants will receive an email from NYU approximately 2-3 days before the Institute containing a link and special password in order to access and to download and/or print the course materials for the day(s) of attendance. Free WiFi also will be available for attendees at the Institute. Bound hardcopies of the course materials will be available only upon advance request at an additional fee of $250. If you wish to have a printed set of materials available at the NYU Registration Desk for the day(s) of your attendance, please indicate this when registering and submit the additional fee of $250. Printers will not be available at the conference. Please note that materials not provided to NYU in advance may be available in hard copy onsite and/or may be emailed to registrants after the Institute upon request. However, last minute materials will not be on the USB flash drive. If you are unable to attend the Institute but would like to receive a copy of the course materials (on a USB flash drive), please send your request to: NYU 75th Institute on Federal Taxation Course Materials Order, 11 West 42nd Street, Suite 400, New York, NY 10036, call 212-992-3320 or email sps.tax@nyu.edu to reserve your copy. See the Institute Registration Form for further details on how to order course materials.

Matthew Bender & Co., Inc., a member of the LexisNexis Group®, also publishes comprehensive articles written by speakers, based upon their presentation during the NYUSPS Institute. For additional information regarding NYUSPS Institute publications, please call 937-610-5157 or email david.t.soborski@lexisnexis.com.

SPONSORSHIP AND EXHIBIT OPPORTUNITIES
For information on becoming an Institute sponsor or exhibiting at the conference, please contact Kathleen Costello at 212-992-3320 or by email at kathleen.costello@nyu.edu.

CONTINUING EDUCATION CREDIT
The NYU School of Professional Studies is a recognized leader in professional continuing education. The NYU School of Professional Studies Department of Finance and Law Programs has been certified by the New York State Continuing Legal Education Board as an Accredited Provider of continuing legal education in the State of New York. This conference meets the educational requirements of many organizations and agencies with mandatory CLE/CPE/CE filing requirements. We urge you to contact our office at 212-992-3320 or at sps.tax@nyu.edu at least 30 days prior to the conference start date to ensure the availability of credit for a specific MCLE state, as we cannot guarantee that credit will be applied for in all cases.

NASBA
The NYU School of Professional Studies Department of Finance and Law Programs is registered with the National Association of State Boards of Accountancy (NASBA), as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors through its website: learningmarket.org. Delivery Method: Group-Live. Program Level: Overview. NASBA Fields of Study: Taxes; Regulatory Ethics. Prerequisite: No prerequisite. Advanced Preparation: No advanced preparation required.

New York and Texas require sponsors to individually register with their states as continuing professional education sponsors; the NYU School of Professional Studies is a registered sponsor in the State of New York (Sponsor ID# 000493) and in the State of Texas (Sponsor ID#000439).

IRS CONTINUING PROFESSIONAL EDUCATION CREDITS
The NYU School of Professional Studies has been approved as an IRS CE Provider. Provider #P9CA0. Enrolled Agents and Tax Preparers should always look for IRS approved providers when fulfilling their continuing education requirements. Visit irs.gov/taxpros/ce for more information.

ESTIMATED CONTINUING EDUCATION CREDITS
Except where indicated, CLE credits are in the categories of professional practice/practice management. CLE boards define a credit hour as either 60 minutes or 50 minutes. Recommended CPE credits are in the following NYS subject area: Taxation. NASBA Fields of Study: Taxes; Regulatory Ethics. In accordance with the Standards of the National Registry of CPE Sponsors, CPE credits are based upon a 50-minute hour. Please note that not all state boards accept half-credits.
FULL-WEEK CREDIT HOURS:
45.0 60-minute hrs. including 3.0 Ethics Credits
54.5 50-minute hrs. including 4.0 Ethics Credits
(This includes all evening session workshops.)

The following is a daily breakdown of the credit hours for those attending single days:

<table>
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<tr>
<th></th>
<th>SUNDAY</th>
<th>MONDAY</th>
<th>TUESDAY</th>
<th>WEDNESDAY</th>
<th>THURSDAY</th>
<th>FRIDAY</th>
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<td>7.0 60-min. hrs.</td>
<td>6.75 60-min. hrs.</td>
<td>*8.25 60-min. hrs.</td>
<td>**8.25 60-min. hrs.</td>
<td>**8.25 60-min. hrs.</td>
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<td>8.5 50-min. hrs.</td>
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<td>**10.0 50-min. hrs.</td>
<td>**10.0 50-min. hrs.</td>
<td>7.5 50-min. hrs.</td>
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* This includes 1.5 60-minute hours or 2.0 50-minute hours of credit for an evening session.
** This includes 1.5 60-minute hours or 2.0 50-minute hours of ethics credit for an ethics evening session.

A certificate of attendance is given to each registrant and validated upon completion of attendance. For questions concerning credit hours or approvals, please call 212-992-3320 or email sps.tax@nyu.edu.

REGISTRATION INSTRUCTIONS

ONLINE
- VISIT sps.nyu.edu/ift
- Highly recommended for fastest response
- Automated email confirmation will be sent to the email address provided to NYU at the time of registration
- Please use an individual email address for each registrant
- Major credit cards accepted: American Express®, Discover®, MasterCard®, or VISA®

OTHER REGISTRATION OPTIONS

Mail: To register by mail, complete the registration form and return it with a check or money order payable to New York University, to: NYUSPS Budget Office, New York University, 7 East 12th Street, 12th Floor, New York, NY 10003, Attention: 75th Institute on Federal Taxation. All registrations sent by mail must be received by 12 p.m. on Thursday, October 20, 2016 (Eastern Standard Time) for New York and by 12 p.m. on Thursday, November 10, 2016 (Eastern Standard Time) for California.

Onsite: To register onsite, you may pay with a check, a money order, or a credit card. To pay by credit card, all walk-ins will be required to self-register at available kiosks. For faster service, conference attendees should plan to register in advance online at sps.nyu.edu/ift. To register onsite, visit the NYU Registration Desk at the Institute beginning at 10:30 a.m. on Sunday or 8 a.m. Monday–Friday.

Note: Each person attending the IFT must register individually by using a separate form, or in a separate online registration session. Sharing registrations is NOT permitted. Only registered attendees are eligible to receive continuing education credits. Please call 212-992-3320 or email sps.tax@nyu.edu for information on customizing a group discount to fit your needs. To register online for the 20% Full-Week Team Discount, please call 212-992-3320 or email sps.tax@nyu.edu for a special discount code. To qualify: Team must be from the same firm and must register together. Each team member must register. Team discounts must be applied at time of registration. Discounts cannot be applied retroactively to existing registrations, or combined with any other offers. After October 4, to register online for the 15% Full-Week full-time government official, full-time university professor, solo practitioner, nonprofit or small firm discount, please call 212-992-3320 or email sps.tax@nyu.edu for a special discount code. We do not accept faxed registrations or wire transfers as a form of payment.

Note: Confirmations may display the start and end dates of the ENTIRE Institute; please check the conference agenda for individual dates and times.

For further information regarding administrative policies, such as complaints and refunds, or if you need help registering, please call our conference administrators at 212-992-3320 or email sps.tax@nyu.edu.
REGISTRATION FORM

NEW YORK: October 23–28, 2016  |  SAN DIEGO: November 13–18, 2016

Online:  sps.nyu.edu/ift
Mail To:  NYU School of Professional Studies Budget Office, New York University
7 East 12th Street, 12th Floor, New York, NY 10003
Attention: Institute on Federal Taxation

CHOOSE EITHER: 1. FULL-WEEK REGISTRATION

Check one for registration and payment:

<table>
<thead>
<tr>
<th>Individual Full-Week Registration</th>
<th>$2,120</th>
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<tbody>
<tr>
<td>15% Early-Bird Full-Week Discount Registration</td>
<td>$1,802</td>
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<tr>
<td>To qualify: Your registration must be received by October 4.</td>
<td></td>
</tr>
<tr>
<td>20% Team Full-Week Discount Registration</td>
<td>$1,696 Each</td>
</tr>
<tr>
<td>To qualify: Team must be from the same firm and register together. Each team member must register. Team discounts must be applied at the time of registration. Discounts cannot be applied retroactively to existing registrations, or combined with any other offers.</td>
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</tr>
<tr>
<td>15% Full-Time Government Official/Full-Time University Professor Full-Week Discount Registration</td>
<td>$1,802 Each</td>
</tr>
<tr>
<td>To qualify: Please provide proof of employment with registration. Cannot be combined with the 15% early-bird, or with any other offers.</td>
<td></td>
</tr>
<tr>
<td>15% Small Firm/Solo Practitioner/Nonprofit Full-Week Discount Registration</td>
<td>$1,802 Each</td>
</tr>
<tr>
<td>To qualify: Please enclose company letterhead with registration. Cannot be combined with the 15% early-bird, or with any other offers.</td>
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OR: 2. SINGLE-DAY REGISTRATION

Step 1: Check the day(s) for which you wish to register:

NY
Sun. Oct. 23
Mon. Oct. 24
Tues. Oct. 25
Wed. Oct. 26
Thurs. Oct. 27
Fri. Oct. 28
SD
Sun. Nov. 13
Mon. Nov. 14
Tues. Nov. 15
Wed. Nov. 16
Thurs. Nov. 17
Fri. Nov. 18

Step 2: Check one for payment:

| 1 Day—$595 |
| 2 Days—$1,075 |
| 3 Days—$1,395 |
| 4 Days—$1,675 |
| 5 Days—$1,795 |
| 1/2 Day—$350 |
| Tuesday, Wednesday, and/or Thursday Evening Session—$125 each* |

*Evening session registration is included in the purchase of daytime registration or can be purchased separately.

PRINTED COURSE MATERIALS—Extra Option for an Additional Fee

We are going green; to help defray costs, printed materials are available for an additional $250. Check here if you want a bound copy of the materials for the day(s) of your attendance and include the $250 fee.

Printed Materials for $250

Included in the conference fee, registrants will be provided access to download and/or print the course materials prior to the Institute and also will receive a USB flash drive at the time of check-in containing the materials for the day(s) of attendance.

I am a/n CPA ATTY ATTORNEY EA RTRP OTHER
I require CLE Credit CPE Credit CE Credit
FOR CLE ONLY: For which state(s) is CLE credit being requested?

Print or type clearly. This information will appear on the attendee list and on your badge. (Emails will not be publicized.)

Name:
Firm:
Address:
City:  State:  Zip Code:
Email:
Business Phone:

(*Email is required—registration confirmations are sent via email.)

CAN’T ATTEND?

If you are unable to attend the Institute but would like to receive a copy of the course materials (on a USB flash drive), please send your request to: NYU School of Professional Studies, 75th Institute on Federal Taxation Course Materials Order, 11 West 42nd Street, Suite 400, New York, NY 10036, call 212-992-3320, or email sps.tax@nyu.edu to reserve your copy. Reserve your copy by November 4, 2016. We cannot guarantee a selection after November 4. The price for one set of materials on a USB flash drive is $500. There is no additional charge for shipping and handling in the continental US. Please add an additional $20 for shipping orders outside the continental US. Please make checks or money order payable to New York University. Materials are mailed in early December 2016.

Please send me: 75th Institute on Federal Taxation Course Materials

Name:
Firm:
Address:
City:  State:  Zip Code:
Email:

For more information, call 212-992-3320. Register online at sps.nyu.edu/ift | 23
ATTENTION MAIL ROOM: If the individual whose name is on the label is no longer employed, please forward this material to his/her successor.