NEW YORK UNIVERSITY
SCHOOL OF CONTINUING
AND PROFESSIONAL STUDIES

69TH INSTITUTE ON
FEDERAL TAXATION

A YEAR OF INSIGHTS AND ANALYSES
FROM AMERICA’S TOP TAX AUTHORITIES

October 17–22, 2010
The Grand Hyatt
New York, NY

November 14–19, 2010
The Hotel Del Coronado
San Diego, CA

Conference Co-Chairs:

Harry L. Gutman, Esq., principal-in-charge
of federal tax legislative and regulatory services,
KPMG LLP, Washington, DC

Eric B. Sloan, Esq., co-managing principal,
pastthroughs, National Tax Office,
Deloitte Tax LLP, New York, NY

DIVISION OF PROGRAMS IN BUSINESS
DEPARTMENT OF ACCOUNTING, TAXATION, AND LEGAL PROGRAMS
OCTOBER 17–22, 2010, THE GRAND HYATT, NEW YORK, NY
NOVEMBER 15–20, 2010, THE HOTEL DEL CORONADO, SAN DIEGO, CA

CONFERENCE CO-CHAIRS:
Harry L. Gutman, Esq., principal-in-charge of federal tax legislative and regulatory services, KPMG LLP, Washington, DC
Eric B. Sloan, Esq., co-managing principal, pass-throughs, National Tax Office, Deloitte Tax LLP, New York, NY

NEW YORK UNIVERSITY
SCHOOL OF CONTINUING AND PROFESSIONAL STUDIES
Robert S. Lapiner, Ph.D., dean
DEPARTMENT OF ACCOUNTING, TAXATION, AND LEGAL PROGRAMS
Kathleen Costello, CMP, assistant director

LEARNING OBJECTIVES
The Institute is designed for the practitioner who must frequently anticipate and handle federal tax matters. It provides high-level updates, practical advice you can implement, and in-depth analysis of the latest trends and developments from leading experts. Attendees return to work with a wealth of materials, plus the tools and strategies needed to help save their clients’ tax dollars and provide them with better service. Just as important, the Institute provides the perfect setting to meet practitioners from all 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?
For tax practitioners, the NYU Institute on Federal Taxation is the event of the year. 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.

ADVISORY BOARD
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Arthur D. Seidman, Esq., Patterson, Belknap, Webb & Tyler LLP, New York, NY

For more information, call (212) 992-3320. Register online at www.scp.nyu.edu/ift
NYU: KEEPING YOU CURRENT ON FEDERAL TAXATION TOPICS

NYU’s 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 from the worlds of 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
Harry L. Gutman, Esq., principal-in-charge of federal tax legislative and regulatory services; director, Tax Governance Institute, KPMG LLP, Washington, DC
October 17, 2023 November 14, 2023

TAX CONTROVERSIES
Charles P. Rettig, Esq., partner, Hochman, Salkin, Rettig, Toscher & Perez, P.C., Beverly Hills, CA
October 17, 2023 November 14, 2023

EXECUTIVE COMPENSATION & EMPLOYEE BENEFITS
Mary B. Hevener, Esq., partner, Morgan, Lewis & Bockius LLP, Washington, DC
October 17, 2023 November 14, 2023

CLOSELY-HELD BUSINESSES
Jerald David August, Esq., partner, Fox Rothschild LLP, West Palm Beach, FL & Philadelphia, PA
October 18, 2023 November 15, 2023

EVENING SESSION: FUNDAMENTALS OF PARTNERSHIP AND REAL ESTATE TAXATION
Blake D. Rubin, Esq., partner, McDermott Will & Emery LLP, Washington, DC
October 18, 2023 November 15, 2023

PARTNERSHIPS, LLCs, AND REAL ESTATE
Blake D. Rubin, Esq., partner, McDermott Will & Emery LLP, Washington, DC
October 19, 2023 November 16, 2023

TRUSTS AND ESTATES
Richard A. Oshins, Esq., member, Oshins & Associates, LLC, Las Vegas, NV
October 20, 2023 November 17, 2023

EVENING SESSION: ETHICS
Bryan C. Skarlatos, Esq., partner, Kostelanetz & Fink, LLP, New York, NY
October 20, 2023 November 17, 2023

CORPORATE TAX
Lewis R. Steinberg, Esq., managing director and head of U.S. strategic advisory, investment banking division, Credit Suisse, New York, NY
Stephen D. Rose, Esq., partner, Munger, Tolles & Olson LLP, Los Angeles, CA
October 21, 2023 November 18, 2023

EVENING SESSION: FUNDAMENTALS OF INTERNATIONAL TAXATION
William B. Sherman, Esq., partner, Holland & Knight LLP, Fort Lauderdale, FL
October 21, 2023 November 18, 2023

HOT TAX TOPICS
William G. Cavanagh, Esq., partner, Chadbourne & Parke LLP, New York, NY
October 22, 2023 November 19, 2023

INTERNATIONAL TAX
William B. Sherman, Esq., partner, Holland & Knight LLP, Fort Lauderdale, FL
October 22, 2023 November 19, 2023

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For more information, call (212) 992-3320. Register online at www.scps.nyu.edu/ift
**DAY 1: SUNDAY, OCT. 17/NOV. 14**

10.30 a.m.  **Continental Breakfast**  
Full-Week and Single-Day Registration and Distribution of Materials

**CURRENT DEVELOPMENTS**

Chair:  *Harry L. Gutman, Esq.,* principal-in-charge of federal tax legislative and regulatory services; director, Tax Governance Institute, KPMG LLP, Washington, DC

11 a.m. **LEGISLATIVE UPDATE**  
A review of legislation enacted, considered and pending in the current congressional session.  
*Harry L. Gutman, Esq.,* principal-in-charge of federal tax legislative and regulatory services; director, Tax Governance Institute, KPMG LLP, Washington, DC

12.15 p.m. **THE TREASURY AGENDA**  
A review of recently issued and pending Treasury guidance.  
**U.S. Department of the Treasury Representatives will be invited to attend**

1.30 p.m. **Refreshment Break**

**TAX CONTROVERSIES**

Chair:  *Charles P. Rettig, Esq.,* partner, Hochman, Salkin, Rettig, Toscher & Perez, P.C., Beverly Hills, CA

1.45 p.m. **FROM THE EXPERTS: TAX CONTROVERSY AND TAX LITIGATION UPDATE**  
Join a United States Tax Court Judge and leading government and private tax controversy practitioners for an open discussion regarding current developments in the United States Tax Court; pending IRS enforcement initiatives, hot topics and enforcement priorities within the IRS Small Business and Self-Employed Operating Division and the IRS Large & Mid-Size Business Division; update from IRS Appeals; criminal tax enforcement update (foreign and domestic) and recent cases and legislation of significance. Is the Tax Court the best litigation alternative? What constitutes proper disclosure of uncertain tax positions? Can you adequately protect potentially privileged communications in a Textron environment? Is reliance or ignorance a possible defense to civil penalties or criminal sanctions?  
**Moderator:**  *Charles P. Rettig, Esq.,* partner, Hochman, Salkin, Rettig, Toscher & Perez, P.C., Beverly Hills, CA  
**NY & SD:**  *John O. Colvin,* chief judge, United States Tax Court, Washington, DC  
*Victor S.O. Song,* chief, Criminal Investigation Division, Internal Revenue Service, Washington, DC  
**NY:**  *Diane S. Ryan, Esq., CPA,* chief, appeals, Internal Revenue Service, Appeals, Washington, DC  
*Faris R. Fink, Esq.,* deputy commissioner, Small Business/Self-Employed Division, Internal Revenue Service, Washington, DC  
*Kathryn Keneally, Esq.,* partner, Fulbright & Jaworski L.L.P., New York, NY  
**SD:**  *Chris Wagner, Esq.,* commissioner, Small Business/Self-Employed Division, Internal Revenue Service, Washington, DC

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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.
Annette M. Streeter, area director, appeals, Internal Revenue Service, Appeals, Riverside, CA
William E. Taggart, Jr., Esq., member, Taggart & Hawkins, P.C., Oakland, CA

4.15 p.m.  Refreshment Break

EXECUTIVE COMPENSATION & EMPLOYEE BENEFITS
Chair: Mary B. Hevener, Esq., partner, Morgan, Lewis & Bockius LLP, Washington, DC

4.30 p.m.  INFORMATION REPORTING AND THE TAX GAP
In Washington, information reporting has become the "solution" to the Tax Gap problem. In the past two years, several significant new requirements have been enacted, including stock basis reporting, reporting on credit card and third party network transactions (IRC Section 6050W), new requirements for transactions with foreign financial institutions (FATCA), and reporting of payments to corporations and for merchandise under IRC Section 6041. Accounts payable departments alone will be hit by three of these developments. This session provides an overview of these requirements as well as other legislative and regulatory developments in the world of reporting and withholding including TIN matching and TIN truncation, logos, penalties, and the latest reports from the Taxpayer Advocate, IRPAC and GAO.
NY: Maria D. Murphy, Esq., managing director, PricewaterhouseCoopers LLP, Washington, DC
SD: Candace B. Ewell, Esq., director, PricewaterhouseCoopers LLP, Washington, DC

5.30 p.m.  PATIENT PROTECTION AND AFFORDABLE CARE ACT: CURRENT DEVELOPMENTS AFFECTING EMPLOYER GROUP HEALTH PLANS
This session provides an overview of the Patient Protection and Affordable Care Act ("PPACA") focusing on its impact on employers and employer group health plans. Emphasis is placed on provisions that are effective in 2010 or 2011, including the small business tax credit for insurance premiums, coverage of adult children, and mandated benefits and restrictions. In addition, because significant regulatory guidance under PPACA is expected yet this year, the session provides an update on key regulatory guidance, including anticipated guidance on grandfathered plans under PPACA.
Martin J. Moderson, Esq., partner, Sonnenschein Nath & Rosenthal LLP, Kansas City, MO

6.30 p.m.  NATIONAL RESEARCH PROGRAM AUDITS: OVERVIEW FROM THE IRS AND PRACTITIONERS
An overview of employer’s initial experiences with the first round of IRS audits (which worker classification will extend to 6,000 employers in 2010-2012), covering fringe benefits, employment taxes, and executive compensation. This session focuses on the latest worker classification, reporting, and payroll tax issues affecting taxpayers, including legislation affecting worker classification, the IRS’s “Questionable Employment Tax Practice” initiative, regulations and other new guidance governing assessments, refunds, and corrections of previously-filed employment tax returns, developments in the fringe benefit and business expense areas, and other issues being raised by the IRS and Congress that affect employment tax liabilities.
NY: David R. Fuller, Esq., partner, Morgan, Lewis & Bockius LLP, Washington, DC
SD: Mary B. Hevener, Esq., partner, Morgan, Lewis & Bockius LLP, Washington, DC

7.30 p.m.  Recess
DAY 2: MONDAY, OCT. 18/NOV. 15

8 a.m. Continental Breakfast
Single-Day Registration and Distribution of Materials

CLOSELY-HELD BUSINESSES
Chair: Jerald David August, Esq., partner, Fox Rothschild LLP,
West Palm Beach, FL & Philadelphia, PA

8.30 a.m. OPERATION OF THE PROFESSIONAL CORPORATION 2010:
REASONABLE COMPENSATION ISSUES FOR PROFESSIONAL
AND OTHER SERVICE BUSINESSES
This presentation discusses the advantages and disadvantages of operating the
service corporation as a C corporation, S corporation or LLC, with particular
emphasis on the case law addressing unreasonably high compensation in the
case of professional corporations operating as C corporations and unreasonably
low compensation in the case of professional corporations operating as S cor-
porations. Additionally, this presentation discusses planning opportunities to
avoid attacks based on unreasonably high compensation, including electing S
corporation status, and focuses on alternatives for avoiding or minimizing the
built-in gain tax imposed under Section 1374 in connection with a C corpora-
tion’s conversion to S corporation status.
Ronald A. Levitt, Esq., shareholder, Sirote & Permutt, P.C., Birmingham, AL
Stephen R. Looney, Esq., shareholder, Dean, Mead, Egerton, Bloodworth,
Capouano & Bozarth, P.A., Orlando, FL

9.30 a.m. Refreshment Break

9.45 a.m. THE IMPACT OF THE HEALTH CARE BILL
ON CLOSELY-HELD BUSINESS
The Patient Protection and Affordable Health Care and Reconciliation Acts
will undoubtedly affect individuals and entities throughout the American econ-
omy. The focus of this presentation is on their impact on tax and other plan-
ning for closely-held business. The increased self-employment/FICA tax on
upper income individuals, as well as the new Medicare tax on unearned
income, will obviously affect choice of entity and other tax planning. However,
the complex new rules intended to drastically increase the number of individu-
als covered by health insurance will also have an impact on the design and
implementation of virtually all employer fringe benefit programs. The goal of
this presentation is to provide an overview and approach on how to handle
these new issues, including the dizzying array of transition rules.
Thomas J. Nichols, Esq., shareholder, Meissner Tierney Fisher & Nichols S.C.,
Milwaukee, WI

10.45 a.m. CAN YOU SPELL M&A WITH AN S IN IT?
A discussion of current structures for buying or selling an S corporation by a
financial buyer or a strategic buyer in a taxable or nontaxable transaction, includ-
ing purchase of the target S corporation stock, the purchase of assets, qualified
stock purchase under Section 338(h)(10) treated as a deemed asset sale for tax
purposes, and a taxable or nontaxable merger. The impact of the installment sale
rules, the negotiation of tax representations and warranties and tax indemnities,
and the tax consequences of the disposition of qualified subchapter S subsidiaries
and other disregarded entities are also discussed. Typical fact patterns are
illustrated in hypothetical problems involving S corporations and S corporation
subsidiaries as the target and as the acquiring corporation.
C. Wells Hall, III, Esq., partner, Mayer Brown LLP, Charlotte, NC

11.45 a.m. Lunch Recess
TAX PLANNING WITH QUALIFIED SUBCHAPTER S SUBSIDIARIES AND SINGLE MEMBER LIMITED LIABILITY COMPANIES
This discussion addresses the use of the QSub and the single member LLC in various planning contexts, including acquisitions and divestitures. Among the topics discussed are formation and termination issues, including sales of single member entities, and use of single member entities in international tax planning.

Jerald David August, Esq., partner, Fox Rothschild LLP, West Palm Beach, FL & Philadelphia, PA

Richard A. Shaw, Esq., special counsel, Higgs, Fletcher & Mack LLP, San Diego, CA

2.15 p.m. Refreshment Break

DIVISIONS AND MERGERS OF PARTNERSHIPS
Exploration of how single member and multi-member partnerships and LLCs can be combined or split up including potential termination, taxation and attribute impact. Analysis of partial cash outs and impact if the entities operate outside the United States.

NY: Michael Hirschfeld, Esq., partner, Dechert LLP, New York, NY
SD: Stephen M. Breitstone, Esq., partner, Meltzer, Lippe, Goldstein & Breitstone LLP, Mineola, NY

3.30 p.m. PLANNING CONSIDERATIONS IN WORKING WITH SERVICE BASED PROFITS INTERESTS IN PARTNERSHIPS
Discussion focuses on the history behind the various tax methods for characterizing and taxing the issuance, ownership and sale of service based profits interests. The carried interest legislation, if enacted, will be a central part of the presentation. Impact on allocations and basis is also highlighted.

Terence F. Cuff, Esq., partner, Loeb & Loeb LLP, 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., partner, McDermott Will & Emery LLP, Washington, DC

Panelists from the following day’s program may also attend.
8 a.m.  Continental Breakfast  
Single-Day Registration and Distribution of Materials

PARTNERSHIPS, LLCs, AND REAL ESTATE  
Chair: Blake D. Rubin, Esq., partner, McDermott Will & Emery LLP; 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.  
Curtis G. Wilson, Esq., associate chief counsel (passthroughs & special industries), Internal Revenue Service, Washington, DC  
Blake D. Rubin, Esq., partner, McDermott Will & Emery LLP, Washington, DC

9.15 a.m.  NEW LEGISLATION ON CARRIED INTERESTS  
The new carried interest legislation dramatically changes the tax landscape for partnerships that issue “profits only” interests to key executives and other service providers. Hear about the ramifications of the new legislation and what you can do about it from one of the nation’s leading practitioners.  
Blake D. Rubin, Esq., partner, McDermott Will & Emery LLP, Washington, DC

10.15 a.m.  Refreshment Break

10.30 a.m.  PARTNERSHIP AND REAL ESTATE WORKOUTS AND DEBT RESTRUCTURINGS  
Somebody wise once observed that real estate is a business with a 10-year business cycle and a 5-year memory. How to dull the tax pain, including the new stimulus bill provision allowing deferral of cancellation of indebtedness income and regulations on partnership debt-for-equity exchanges.  
NY: Peter J. Genz, Esq., partner, King & Spalding LLP, Atlanta, GA  
James B. Sowell, Esq., principal, KPMG LLP, Washington, DC  
SD: Kevin Thomason, Esq., partner, Thompson & Knight LLP, Dallas, TX  
Fred T. Witt, Esq., director, Deloitte Tax LLP, Phoenix, AZ

11.45 a.m.  Lunch Recess

1.15 p.m.  RECOVERY OR NONRECOVERY: TREATMENT OF LIABILITIES IN A COMPLEX WORLD  
Disregarded entities and complex modern financing arrangements complicate the analysis of whether a liability is recourse or nonrecourse for a variety of important purposes under the Code, including allocation of partnership liabilities and determination of cancellation of indebtedness income. Are there any answers to these fundamental questions?  
NY: Jon G. Finkelstein, Esq., partner, McDermott Will & Emery LLP, Washington, DC  
SD: Andrea M. Whiteway, Esq., partner, McDermott Will & Emery LLP, Washington, DC
2 p.m.  PLANNING POTPOURRI MINI-PANELS
• New Economic Substance Legislation
• What to Look For and Negotiate in Like-Kind Exchange Documents
• “Green” Tax Incentives

NY: Jeffrey G. Davis, Esq., partner, Mayer Brown LLP, Washington, DC
    Jeffrey H. Paravano, Esq., partner, Baker Hostetler LLP, Washington, DC
    Robert D. Schachat, Esq., principal, Ernst & Young LLP, Washington, DC
    Steven R. Schneider, Esq., director, Goulston & Storrs, P.C., Washington, DC

SD: Adam M. Cohen, Esq., partner, Holland & Hart LLP, Denver, CO
    Adam M. Handler, Esq., principal, PricewaterhouseCoopers LLP, Los Angeles, CA
    James M. Lowy, Esq., principal, Ernst & Young LLP, San Francisco, CA
    Barbara Spudis de Marigny, Esq., partner, Gardere Wynne Sewell LLP, Houston, TX

3 p.m.  Refreshment Break

3.15 p.m.  SERIES LLCs
New regulations on the treatment of “series” limited liability companies create new issues, opportunities and pitfalls. Find out what you need to know about this important new topic.

NY: Howard J. Levine, Esq., partner, Roberts & Holland LLP, Washington, DC
SD: William S. Woods, II, principal, Ernst & Young LLP, Los Angeles, CA

4 p.m.  HOT LIKE-KIND EXCHANGE ISSUES
Related party exchanges; build-to-suits, reverse exchanges and parking; exchanges involving partnerships and trusts; tenancy-in-common issues; recent developments on what constitutes “like-kind”; other current issues.

NY: Robert D. Schachat, Esq., principal, Ernst & Young LLP, Washington, DC
SD: Adam M. Handler, Esq., principal, PricewaterhouseCoopers LLP, Los Angeles, CA

5 p.m.  Recess

5 p.m.  NETWORKING RECEPTION
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 4: WEDNESDAY, OCT. 20/NOV. 17

8 a.m.  Continental Breakfast
Single-Day Registration and Distribution of Materials

TRUSTS & ESTATES
Co-Chairs: Richard A. Oshins, Esq., member, Oshins & Associates, LLC, Las Vegas, NV
          Sanford J. Schlesinger, Esq., founding partner, Schlesinger Gannon & Lazetera LLP, New York, NY

8.30 a.m.  PLANNING IN UNCERTAIN TIMES—THROUGH THE LOOKING GLASS?
The speaker discusses the impact of any estate tax legislation which may be enacted after January 1, 2010, the effect of the repeal of the estate tax for 2010, in the absence of any estate tax legislation which would be retroactive to January 1, 2010, including its effect on existing estate planning instruments and drafting new estate planning instruments; the consequences of carryover basis in 2010, if it has not...
been retroactively repealed; and the effect of the "sunset" provisions which become operative on January 1, 2011, if they continue in force.

**Sanford J. Schlesinger, Esq., founding partner, Schlesinger Gannon & Lazetera LLP, New York, NY**

9:30 a.m. **WHAT’S HOT AND WHAT’S NOT IN SOPHISTICATED LIFE INSURANCE PLANNING**

This presentation includes a detailed analysis of two related techniques used in sophisticated life insurance planning – private premium financing and private split-dollar (together known as private premium funding)—as a way to reduce (or even eliminate) the transfer tax consequences of funding irrevocable life insurance trusts with large amounts of premium. The presentation reviews the legal and tax consequences of each of those forms of private premium funding, and compares and contrasts them. In addition, the presentation analyzes one of the more opaque issues in life insurance in sophisticated life insurance planning today—what is the “fair market value” of a policy for income or transfer tax purposes? This issue comes up in transferring policies during an insured’s lifetime, by gift or sale, in a variety of contexts, and there is one answer for some income tax purposes and potentially another answer for some gift tax purposes.

**Lawrence Brody, Esq., partner, Bryan Cave LLP, Saint Louis, MO**

10.30 a.m. Refreshment Break

10.45 a.m. **INSTALLMENT SALES TO IDGTs**

The sale to an intentional grantor trust has become the leading estate freeze technique, particularly in light of recent challenges to the continued use of GRATs. Yet, practitioners seeking to do a sale to an intentional grantor trust must face many questions about the method used to create a grantor trust, the effects of the ending of grantor trust status, the structure of the promissory note, and how to assure that the transaction is respected as a sale, rather than a gift with a retained income interest. This presentation addresses all of these issues, and several others that go into implementing a safe and effective sale to an intentional grantor trust.

**NY: Michael D. Mulligan, Esq., member, Lewis, Rice & Fingersh, L.C., Saint Louis, MO**

**SD: Howard M. Zaritsky, J.D., LL.M. (Tax), independent estate planning consultant, Rapidan, VA**

12 p.m. Lunch Recess

1.15 p.m. **PLANNING FOR THE GENERATION-SKIPPING TRANSFER TAX**

This program focuses on the planning techniques that are available to reduce the impact of the generation-skipping transfer tax. Topics discussed include: taking advantage of the absence of the tax in 2010; transferring property to GST exempt trusts in 2010; effective use of GST exemptions; qualified and unqualified severances; and using double skips.

**Carlyn S. McCaffrey, Esq., partner, Weil, Gotshal & Manges LLP, New York, NY**

2.15 p.m. Refreshment Break

2.30 p.m. **THE ARTHUR D. SEDERBAUM MEMORIAL LECTURE**

**FAMILY LIMITED PARTNERSHIPS: THE CONTINUING SAGA**

As the courts continue to decide valuation and family limited partnership cases, the current valuation trends are analyzed and the significant new cases are discussed. The panelists provide guidance for creating, implementing, and preserving the successful FLP.

**NY & SD: John W. Porter, Esq., partner, Baker Botts L.L.P., Houston, TX**

**Richard A. Oshins, Esq., member, Oshins & Associates, LLC, Las Vegas, NV**

**Sanford J. Schlesinger, Esq., founding partner, Schlesinger Gannon & Lazetera LLP, New York, NY**
NY: Michael D. Mulligan, Esq., member, Lewis, Rice & Fingersh, L.C., Saint Louis, MO
Martin M. Shenkman, MBA, CPA, PFS, J.D., principal, Martin M. Shenkman, PC, Paramus, NJ
SD: Howard M. Zaritsky, J.D., LL.M. (Tax), independent estate planning consultant, Rapidan, VA
D. John Thornton, Esq., senior partner, Thornton, Byron LLP, Boise, ID

NY: Michael D. Mulligan, Esq., member, Lewis, Rice & Fingersh, L.C., Saint Louis, MO
Martin M. Shenkman, MBA, CPA, PFS, J.D., principal, Martin M. Shenkman, PC, Paramus, NJ
SD: Howard M. Zaritsky, J.D., LL.M. (Tax), independent estate planning consultant, Rapidan, VA
D. John Thornton, Esq., senior partner, Thornton, Byron LLP, Boise, ID

5 p.m.  Recess

EVENING SESSION

5.15–
6.55 p.m. Estate tax planning and the preparation of Forms 706 can give rise to a myriad of ethical, penalty and criminal issues. From Circular 230, to IRC 6694 to IRC 7201 and 7206(2), there are several rules governing the conduct of estate tax practitioners. The panel reviews those rules and walks through a series of hypothetical fact patterns to illustrate how the rules apply in everyday practice.
Chair: Bryan C. Skarlatos, Esq., partner, Kostelanetz & Fink, LLP, New York, NY
NY & SD: Deborah A. Butler, Esq., associate chief counsel, procedure and administration, Office of Chief Counsel, Internal Revenue Service, Washington, DC
NY: Karen L. Hawkins, Esq., director, Internal Revenue Service, Office of Professional Responsibility, Washington, DC
Christopher S. Rizek, Esq., member, Caplin & Drysdale, Chartered, Washington, DC
Diana L. Wollman, Esq., partner, Sullivan & Cromwell LLP, New York, NY
SD: Miriam L. Fisher, Esq., partner, Morgan, Lewis & Bockius LLP, Washington, DC
Gersham Goldstein, Esq., Stoel Rives LLP, Portland, OR

DAY 5: THURSDAY, OCT. 21/NOV. 18

8 a.m.  Continental Breakfast
Single-Day Registration and Distribution of Materials

CORPORATE TAX
Co-Chairs: Lewis R. Steinberg, Esq., managing director and head of U.S. strategic advisory, investment banking division, Credit Suisse, New York, NY
Stephen D. Rose, Esq., partner, Munger, Tolles & Olson LLP, Los Angeles, CA

8.30 a.m.  VALUING PRIVATELY HELD ASSETS IN TROUBLED TIMES
An expert explores valuation issues related to privately held businesses and reviews recent developments—both favorable and worrisome. This session helps you to identify the pitfalls and planning opportunities in the valuation of compensatory equity interests; gifting of interests in privately held businesses; purchase price allocations in acquisitions; built-in gains for S corp conversions; ESOPs; and other transactions.
Lance S. Hall, ASA, co-founder and president, FMV Opinions, Inc., New York, NY

9.45 a.m.  Refreshment Break
10 a.m. ACQUISITION POTPOURRI: DILIGENCE, NEGOTIATION, DRAFTING, AND STATE AND LOCAL TAX CONSIDERATIONS
This program covers the tax due diligence process, negotiating and drafting provisions in acquisition agreements, and important state and local tax considerations.
Peter L. Faber, Esq., partner, McDermott Will & Emery LLP, New York, NY
Raj Tanden, Esq., partner, Proskauer Rose LLP, Los Angeles, CA

12 p.m. Lunch Recess

1.30 p.m. THE USE OF PARTNERSHIPS AND LLCs IN CORPORATE TAX PLANNING
A discussion of the issues, opportunities, and potential traps presented when partnerships and LLCs are used in corporate transactions. Coverage includes the use of partnerships and LLCs in consolidated groups, as well as a variety of other interesting interactions between the rules of Subchapter K and Subchapter C.
Eric B. Sloan, Esq., co-managing principal, passthroughs, National Tax Office, Deloitte Tax LLP, New York, NY

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 director, Ernst & Young LLP, Washington, DC
NY: Joseph M. Pari, Esq., partner, Dewey & LeBoeuf LLP, Washington, DC
Mark J. Silverman, Esq., partner, Steptoe & Johnson LLP, Washington, DC
SD: John J. Clair, Jr., Esq., partner, Latham & Watkins LLP, Los Angeles, CA
Laurence J. Stein, Esq., partner, Latham & Watkins LLP, Los Angeles, CA

5 p.m. Recess

5.15–6.55 p.m. EVENING SESSION
FUNDAMENTALS OF INTERNATIONAL TAXATION
This session provides an overview of the U.S. tax rules governing foreign persons engaging in investment and other activities in the United States and U.S. persons engaging in investment and other activities outside the United States.
William B. Sherman, Esq., partner, Holland & Knight LLP, Fort Lauderdale, FL
DAY 6: FRIDAY, OCT. 22/NOV. 19

8 a.m. Continental Breakfast
Single-Day Registration and Distribution of Materials

HOT TAX TOPICS
Chair: William G. Cavanagh, Esq., partner, Chadbourne & Parke LLP, New York, NY

8.30 a.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 LLP, New York, NY

10.45 a.m. Refreshment Break

INTERNATIONAL TAX
Chair: William B. Sherman, Esq., partner, Holland & Knight LLP, Fort Lauderdale, FL

11 a.m. TAX PLANNING FOR FOREIGN INBOUND INVESTMENTS AND BUSINESS ACTIVITIES
This session builds on general U.S. tax rules governing foreign inbound transactions by providing practical tax planning strategies in the context of specific case studies, involving various types of foreign activities in the United States, including: sale and distribution of foreign manufactured goods in the U.S.; manufacturing in the U.S.; licensing by a foreign licensor to a U.S. licensee; investing in U.S. real estate; and investing in U.S. stocks, bonds and other portfolio assets.
William B. Sherman, Esq., partner, Holland & Knight LLP, Fort Lauderdale, FL
Leonard Schneidman, Esq., managing director, WTAS LLC, Boston, MA

12.15 p.m. Lunch Recess

1.45 p.m. PROVIDING PRACTICAL TAX ADVICE IN EXPANDING A CLIENT’S BUSINESS OVERSEAS
This session provides practical structuring considerations for U.S. persons investing in and conducting business activities in jurisdictions outside of the United States by analyzing case studies that explore the controlled foreign corporation, passive foreign investment company, foreign tax credit, check-the-box and other relevant rules applicable to such U.S. taxpayers.
NY: Richard E. Andersen, Esq., partner, Patton Boggs LLP, New York, NY
SD: David Forst, Esq., partner, Fenwick & West LLP, Mountain View, CA

3.15 p.m. Refreshment Break

3.30 p.m. INTERNATIONAL TAX COMPLIANCE AND TRANSPARENCY—A WHOLE NEW WORLD
This panel discusses several of the far reaching provisions of U.S. tax and other law requiring information disclosure and other compliance obligations relating to international transactions, focusing on the recently enacted Foreign Account Tax Compliance Act as well as the Proposed FBAR Regulations that were issued in March 2010, and in light of OECD Global Forum on Transparency and Exchange of Information. Additionally, the panel provides an update on the status of the IRS Offshore Income Reporting Initiative as well as current options for taxpayers with noncompliance.
Kevin E. Packman, Esq., partner, Holland & Knight LLP, Miami, FL

4.30 p.m. Recess

For more information, call (212) 992-3320. Register online at www.scps.nyu.edu/ift
New York University thanks the following organizations for their contribution to the enhancement and continued success of the Institute on Federal Taxation.

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For more information, call (212) 992-3320. Register online at www.sps.nyu.edu/ift
GENERAL INFORMATION

FULL-WEEK CONFERENCE FEES AND Discounts
The full-week conference fee includes tuition, continental breakfast, networking reception on Tuesday evening, refreshment breaks, and one set of course materials. A Full-Week Individual Registration is $1,980 for all six days. If you register before September 10, you will qualify for the 15% Early-Bird Full-Week Registration discount ($1,683). If two or more individuals register from the same firm at the same time, each person qualifies for the 15% Full-Week Team Discount ($1,683 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. If you are a solo practitioner, work for a firm with fewer than 5 professionals, or work for a nonprofit organization, you receive a 15% discount off a full-week registration. Note: Discount offers may not be combined. Full and partial scholarships based on financial need are available as well. To request an application, please call (212) 992-3320, fax (212) 992-3650, or e-mail your request to scps.atl@nyu.edu.

SINGLE- AND MULTI-DAY CONFERENCE FEES AND Discounts
Single- and multi-day conference fees include tuition, continental breakfast, refreshment breaks, one set of course materials for the day(s) of your attendance, and admission to Tuesday’s networking reception. Single-Day Registration is $575 for one day. If you register for 2 days, you qualify for a 10% discount ($1,035); 3 days, receive a 20% discount ($1,380); 4 days, receive a 30% discount ($1,610); and 5 days, receive a 40% discount ($1,725). Note: Discount offers may not be combined.

CORPORATE GROUP DISCOUNTS
We recognize that your organization may not be able to afford the time and expense to send all of its employees to the 69th 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 5 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 e-mail scps.atl@nyu.edu.

BADGE AND MATERIAL 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 conference Registration Desk will be open at 8 a.m. Monday through Friday.

PRESS BADGES
If your publication plans to cover the NYU 69th Institute on Federal Taxation, please e-mail coverage strategy and press credentials to scps.press@nyu.edu.

CANCELLATION AND SUBSTITUTION POLICY
A written request for cancellation must be faxed to (212) 992-3650 or e-mailed to scps.atl@nyu.edu to the attention of: Conference Administration. If your request is received by October 1 for New York or by October 29 for San Diego, you will receive a 100% tuition refund less a $250 cancellation fee. Due to financial obligations incurred by NYU, there are no refunds available during the two weeks prior to the conference. If you are unable to attend the Institute but would like to send a substitute, please fax written notification to (212) 992-3650 or e-mail scps.atl@nyu.edu no later than October 12 for New York or November 1 for San Diego.

CONFERENCE MATERIALS
Course materials are provided for each day of the Institute for which you are registered. Included in the conference fee, you may select to receive a set of the materials for the day(s) of your attendance in either hard copy format or on a CD-ROM. The hard copy written materials are the bound book(s) containing the articles and documents prepared by the speakers relative to the day(s) of your attendance. The CD-ROM is the electronic data version of the course materials and contains the same articles and documents in PDF format. CD-ROMs do not contain audiofiles. If you wish to receive both the hard copy and electronic version of the course materials, there is an additional fee of $125. Registrants who do
not select a desired format will receive their course materials based on format availability. Please note that materials not provided to NYU in advance may be available in hard copy on-site and will not be on the CD-ROM. Course materials may be purchased by confirmed registrants only. Matthew Bender & Co., Inc., a member of the LexisNexis Group®, publishes comprehensive articles written by speakers, based on their presentation at the NYU Institute. For additional information regarding the NYU Publications, please visit the Matthew Bender/LexisNexis exhibit booth at the California Institute, call (908) 673-3363 or e-mail david.t.soborski@lexisnexis.com

SHIPPING OF CONFERENCE MATERIALS
Arrangements have been made with a full-service shipping company to ship registrants’ conference materials to their offices at the conclusion of the conference. This service is at the individual’s expense, and may include a boxing and handling charge. Registrants who do not wish to use this service should make shipping arrangements with the hotel business center or leave space in their luggage for transporting materials home. This service will be available on Thursday from 1–5 p.m. and Friday from 9 a.m.–5 p.m. at the NYU Registration Desk.

NEW YORK CONFERENCE LOCATION AND HOTEL ACCOMMODATIONS
The Grand Hyatt New York hotel is conveniently located in midtown Manhattan on Park Avenue at Grand Central Station. It is a short walk to nearby Broadway theaters, Fifth Avenue shopping, the Empire State Building, Times Square, and major museums. Help NYU continue to provide a quality Institute at the best possible cost by utilizing NYU-selected hotels when making your travel arrangements. Single or double occupancy rooms are available at the NYU group rate of $369. 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 (800) 233-1234 or (212) 883-1234 and identify yourself as attending the NYU 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 20, 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. Help NYU continue to provide a quality Institute at the best possible cost by utilizing NYU-selected hotels when making your travel arrangements. Single or double occupancy rooms are available at The Hotel Del Coronado at the NYU group rate of $260 by calling (800) 468-3533. Resort rooms at $299 and Premier rooms at $362 are also available. In addition to the rates set forth above, the Hotel del Coronado has a daily resort fee of $20 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 cut-off date. These rooms will be held as a block, unless exhausted, until October 11, at which time they will be released to the general public.

SPECIAL NEEDS
Any participants with special needs, such as physical, are encouraged to e-mail scps.atl@nyu.edu or call (212) 992-3320 at least two weeks prior to the conference start date to indicate their particular requirement.

PARTICIPANT LIST
A participant list derived from information provided to NYU at the time of registration will be distributed to attendees at check-in. Early registration is vital to ensure inclusion on the participant list. To appear, your registration must be received and processed by NYU before close of business Tuesday, October 7. Please plan accordingly.

CONTINUING EDUCATION CREDIT
The School of Continuing and Professional Studies at New York University is a recognized leader in professional continuing education. New York University’s Division of Programs in Business’s Department of Accounting, Taxation, and Legal 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. These conferences meet 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 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.
New York University’s School of Continuing and Professional Studies Division of Programs in Business’s Department of Accounting, Taxation, and Legal 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, 150 Fourth Avenue North, Suite 700, Nashville, TN 37219-2417. Web site: http://www.nasba.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; New York University’s School of Continuing and Professional Studies is a registered sponsor in the state of New York (Sponsor ID# 000493) and the state of Texas (Sponsor ID#000439).

CERTIFIED FINANCIAL PLANNERS
Each CFP licensee must complete 30 hours of continuing education each reporting period. The reporting period is a two-year period ending on the last day of the licensee’s renewal month. New York University has filed the 69th Institute on Federal Taxation with the Certified Financial Planner Board of Standards. For more information regarding acceptance of these conferences for continuing education credit, please call (212) 992-3320.

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NYU’s School of Continuing and Professional Studies is a qualified sponsor (Sponsor#673) of continuing professional education required for individuals enrolled to practice before the Internal Revenue Service (enrolled agents). We have entered into an agreement with the Office of Professional Responsibility, Internal Revenue Service, to meet the requirements of 31 Code of Federal Regulations, Section 10.6(g), covering maintenance of attendance records, retention of program outlines, qualifications of instructors, and length of class hours. This agreement does not constitute an endorsement by the Office of Professional Responsibility as to the quality of the program or its contribution to the professional competence of the enrolled individual.

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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 NASBA fields of study: Taxes, Regulatory Ethics. In accordance with the Standards of the National Registry of CPE Sponsors, CPE credits are based on a 50-minute hour. Please note that not all state boards accept half credits.

Full-Week Credit Hours: 45.5 60-minute hrs. (This includes all evening session workshops.) 54.5 50-minute hrs.

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

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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 a full-week, single-, or multi-day registration. For questions concerning credit hours or approvals, please call (212) 992-3320.

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For information on becoming an Institute Sponsor or exhibiting at the conference, please contact Kathleen Costello at (212) 992-3320 or kathleen.costello@nyu.edu.
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You may photocopy the registration form. Please submit a separate form or complete a separate online registration session for each registrant. Registrations will not be processed unless accompanied by a check or credit card information. To ensure the accuracy of your information, it is imperative that you type or print clearly.

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Your e-mail address is your registration ID. Confirmation of registrations submitted online, by mail, fax, or phone will be sent via e-mail to the email address provided to NYU. Please use an individual e-mail address for each registrant.

Note: Confirmations may display the start and end dates of the ENTIRE Institute; please check the conference agenda for individual dates and times. If a confirmation is not received within one week of online registration submission (allow 2-3 weeks for registrations sent by mail/fax/phone), please contact your firm’s IT firewall administrator or e-mail scps.atl@nyu.edu to request a duplicate copy.

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Note: At this time, you may only register for the Individual Full-Week and the Early-Bird Full-Week registration options online. To register for a single or multi-day registration or to take advantage of one of several full-week discount options such as the Full-Week Team Discount or the Full-Week Government Official Discount, you must do so by phone, fax, or mail.

For further information, or if you need help registering, please call our conference administrators at (212) 992-3320.

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By Fax: You may fax your credit card information to us 24 hours a day at (212) 995-4677.

By Mail: To register by mail, simply fill out the registration form and return it with a credit card authorization or check payable to New York University, to: New York University, Institute on Federal Taxation, 25 West 4th Street, Room 203, New York, NY 10012.

By Phone: You may register by phone with your Discover® Card, Visa®, American Express®, or MasterCard®, by calling (212) 992-3320, Monday–Friday, 9 a.m–5 p.m. EST.

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IFT REGISTRATION FORM

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1. FULL-WEEK REGISTRATION

Check one for registration and payment:

- INDIVIDUAL FULL-WEEK REGISTRATION $1,980
  • NY  □  SD
- EARLY-BIRD FULL-WEEK REGISTRATION $1,683
  To qualify: Your registration must be received by September 10.
  • NY  □  SD
- TEAM FULL-WEEK DISCOUNT REGISTRATION $1,683 EACH
  To qualify: Team must be from the same firm and register together.
  Each team member must register.
  • NY  □  SD
- FULL-TIME GOVERNMENT OFFICIAL/FULL-TIME UNIVERSITY PROFESSOR FULL-WEEK DISCOUNT REGISTRATION $1,683 EACH
  To qualify: Please provide proof of employment with registration.
  • NY  □  SD
- SMALL FIRM/SOLO PRACTITIONER/NONPROFIT FULL-WEEK DISCOUNT REGISTRATION $1,683 EACH
  To qualify: Please provide company letterhead with registration.
  • NY  □  SD

OR:

2. SINGLE-DAY REGISTRATION

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

NY: □ SUNDAY □ MONDAY □ TUESDAY □ WEDNESDAY □ THURSDAY □ FRIDAY
SD: □ SUNDAY □ MONDAY □ TUESDAY □ WEDNESDAY □ THURSDAY □ FRIDAY

Step 2: Check one for payment:

□ 1 DAY = $575  □ 2 DAYS = $1,035  □ 3 DAYS = $1,380
□ 4 DAYS = $1,610  □ 5 DAYS = $1,725

COURSE MATERIALS

Please select the format you prefer for your course materials (please choose only one)

□ CD-ROM  □ HARD COPY BOOK
□ $125 FOR BOTH HARD COPY BOOK AND CD-ROM
Registrants not selecting a desired format will receive their course materials based on format availability.

I am a □ CPA  □ ATTORNEY  □ EA  □ CFP  □ OTHER__________
I am applying for □ CLE CREDIT  □ CPE CREDIT  □ CFP CREDIT
FOR CLE ONLY: For which state(s) is CLE credit being requested:________________________

Print or Type clearly. Please DO NOT abbreviate. This information will appear on the attendee list and your badge. (E-mails will not be publicized.)

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Title ____________________________________________________________
Firm ____________________________________________________________
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