16th Annual North Carolina/South Carolina/Georgia Tax Section Workshops

LIVE
Friday–Sunday, May 26–28, 2017
Kiawah Island Golf Resort, Kiawah Island, SC

CLE CREDIT: 12.0 Hours
Includes 1.0 Hour Ethics/Professional Responsibility

UPDATES & REGISTRATION
www.tinyurl.com/CLE623TSW

Planned by the NCBA Tax Section, South Carolina Bar Tax Section and Georgia Bar Tax Section

SUMMARY: Join tax attorneys from North Carolina, South Carolina and Georgia to network and gain knowledge from tax practitioners around the Southeast. Enjoy beautiful Kiawah Island Golf Resort while obtaining up to twelve hours of CLE credit. This year’s program includes state and federal tax updates and recent developments in:
- Conservation Easements
- Captive Insurance
- Exempt Organizations
- 1031 Exchanges
- Estate and Fiduciary Tax
- International Compliance

The North Carolina Bar Association Foundation is accredited by the North Carolina State Bar as a provider of continuing legal education.
16th Annual North Carolina/South Carolina/Georgia Tax Section Workshops

#623TSW  |  May 26-28, 2017

FOUR WAYS TO REGISTER

ONLINE*  www.ncbar.org/CLE  •  PHONE*  800.228.3402  •  FAX*  919.677.1774

MAIL**  Attn: Accounting, NCBA Foundation, P.O. Box 3688, Cary, NC 27519-3688

*Credit cards only.  **Please make checks payable to the NCBA Foundation.

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Friday, May 26, 2017, 8:00a–1:15p

8:00a  Registration and Continental Breakfast

8:25  Welcome and Introductions

8:30  Planning and Defending Conservation Easements in an Adverse Tax Environment

Vivian D. Hoard and Ronald A. Levitt

Section 170(h), relating to conservation easements, has become a hot button for tax advisers and taxpayers and has become the focus of intense IRS scrutiny. Because of the significant tax benefits resulting from the granting of conservation easements, tax advisers have been forced to get acquainted with this area of law. This program provides an overview of how conservation easements work, the main tax and valuation issues that have to be addressed, how the IRS’s coordinated approach to auditing and attacking conservation easements has changed over time and how Notice 2017-10 recently elevated the issue for certain syndication transactions.

9:30  Panel on Captive Insurance

Stanton P. Geller, Doug MacGinnitie and Debra Walker

This panel explains what captive insurance is and provide an overview of the different types of Captives, which includes a discussion of who qualifies, which risks a Captive should cover and potential benefit to business owners. This session also provides practical information regarding how to form a Captive, the tax implications to be aware of and some of the most common red flags.

10:45  Break

Sponsored by Forensic Strategic Solutions Inc.

11:00  Breakout Sessions (choose one)

• North Carolina | North Carolina Sales and Use Tax and North Carolina Legislative Update
  Tenisha S. Jacobs and Eric Wayne

• South Carolina | South Carolina Tax Law Update
  Robert “Bob” Baldwin and John C. von Lehe Jr.

• Georgia | Georgia Tax Section Annual Meeting
  Julian A. Fortuna, Taylor English Duma LLP, Atlanta, 2016-17 Section Chair, presiding

12:30p  North Carolina Tax Section Council Meeting

1:15p  Adjourn

6:30  Reception (Dutch treat)

Osprey Point Clubhouse, 700 Govenors Drive, Kiawah Island, SC 29455

Saturday, May 27, 2017, 8:00a–1:15p

8:00a  Presentation on Military Volunteer Income Tax Assistance (VITA) and Continental Breakfast (non-CLE)

8:30  Trends and Developments for Exempt Organizations

Edward T. Chaney

This session provides an overview of trends and legal developments affecting tax-exempt organizations, with a focus on operating and philanthropic 501(c)(3) organizations. Topics include a discussion of IRS priorities and recent developments, insider transactions, impact investing and social enterprise, advocacy and political activities, and more.
9:30  **Southeastern States Tax Update**  
Kay M. Hobart  
This session focuses on recent developments in state and local taxation, with an emphasis on the various legislative and regulatory efforts intended to challenge the decision of the United States Supreme Court in *Quill v. North Dakota* and assert nexus over retailers with no physical presence in the state.

10:30  Break

10:45  **Proposed Debt Equity Regulations**  
Reginald Mombrun

11:45  **Panel on 1031 Exchanges**  
Julian A. Fortuna and Ricky B. Novak  
Section 1031 exchanges have recently attracted increased attention from the IRS and consequently have been the subject of several recent court decisions. We go beyond the basics in this session to cover complex topics such as related party exchanges, accommodation party ownership, built-to-suit and other forms of construction exchanges, “drop and swap” and other partnership exchange techniques, principal residence and vacation home properties, refinancing before or after an exchange, mixed asset exchanges, and international exchanges.

1:00p  **NCBA Tax Section Annual Meeting**  
Joshua D. Bryant, Smith Anderson Blount Dorsett Mitchell & Jernigan LLP, Raleigh, 2016–2017 Section Chair, presiding

1:15p  Adjourn

**Sunday, May 28, 2017, 8:00a–12:45p**

8:00a  **Continental Breakfast**

8:30  **Estate and Fiduciary Tax Issues**  
Lester Law

9:30  **Ethics of Complex Tax Planning**  
Richard E. “Rick” Marsh  
This session covers the ethics of tax planning by looking at the historical context, global influences and increasing complexity. The standards of ethical conduct is discussed, including the Model Rules and North Carolina Administrative Code.

10:30  Break

10:45  **International Tax Compliance, Enforcement and Disputes: The Most Pressing Issues in 2017 and Beyond**  
Hale E. Sheppard  
Nearly all taxpayers now have some international aspects, which means that their tax advisors must grasp critical international rules and duties. After nearly a decade of different voluntary disclosure programs the IRS now receives more data than ever about foreign activities thanks to agreements with hundreds of foreign banks, compliance with FATCA by foreign financial institutions, mandatory e-filing of FBARs, computerized cross-checking of foreign assets disclosed on Form 8938, automatic-penalty programs for late international information returns, whistleblowers seeking large rewards, the infamous “Panama Papers” and many other sources. The IRS has significantly expanded its Large Business and International Division, too. All this adds up to more focus—in 2017 and future years—on international audits, enforcement and disputes. This presentation helps non-specialists understand the most pressing international tax issues so that they can ask the right questions and avoid problems—both for their clients and themselves.

11:45  **Top Priorities of a Corporate Chief Tax Officer**  
Jack L. Harper

12:45p  Adjourn  
*Indicates portion providing Ethics/Professional Responsibility credit*
Program Information

Planners
• Isaac J. Bradley, Lynch & Eatman LLP, Raleigh
• G.P. Diminich, Smith Moore Leatherwood LLP, Charleston, SC
• Julian A. Fortuna, Taylor English Duma LLP, Atlanta, GA

Speakers
• Robert “Bob” Baldwin, Baldwin & Associates LLC, Mount Pleasant, SC
• Edward T. Chaney, Schell Bray PLLC, Chapel Hill
• Julian A. Fortuna, Taylor English Duma LLP, Atlanta, GA
• Stanton P. Geller, Culp Elliott & Carpenter PLLC, Charlotte
• Jack L. Harper, Discover Financial Services, Chicago, IL
• Vivian D. Hoard, Taylor English Duma LLP, Atlanta, GA
• Kay M. Hobart, Parker Poe Adams & Bernstein LLP, Raleigh
• Tenisha S. Jacobs, North Carolina Department of Justice, Raleigh
• Lester Law, Abbot Downing, Naples, FL
• Ronald A. Levitt, Sirote & Permutt PC, Birmingham, AL
• Richard E. “Rick” Marsh, Marsh Law Firm PLLC, Charlotte
• Doug MacGinnitie, River Oak Risk LLC, Atlanta, GA
• Reginald Mombrun, School of Law, North Carolina Central University, Durham
• Ricky B. Novak, Strategic 1031 Exchange Advisors, Atlanta, GA
• Hale E. Sheppard, Chamberlain Hrdlicka White Williams & Auhtry, Atlanta, GA
• John C. von Lehe Jr., Nelson Mullins Riley & Scarborough LLP, Charleston, SC
• Debra Walker, North Carolina Department of Insurance, Raleigh
• Eric Wayne, North Carolina Department of Revenue, Raleigh

We extend our sincere gratitude to the NCBA Tax Section, South Carolina Bar Tax Section, Georgia Bar Tax Section and the planners and speakers who volunteer their time and expertise toward the goal of presenting an educational program of the very highest quality.

Sponsor (at time of printing)
SILVER | Forensic Strategic Solutions Inc.

Hotel Information
Contact hotel directly for reservations at the special NCBA room rate. Rates are based on availability and may sell out.

Kiawah Island Golf Resort
1 Sanctuary Beach Drive
Kiawah Island, SC 29455
Rate: $234 for One Bedroom Scenic Villa
$253 Two-Bedroom Scenic Villas
$296 Three-Bedroom Scenic Villas
$401 Two-Bedroom Ocean View Villas
Reservations: 800.654.2924
Rate Code: 13012 and mention you are with the NC Bar Association
Cutoff Date: May 4, 2017
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“The program is great. Speakers were a great line up.”
“Good split between planning and litigation matters.”
“Highest level of speakers imbues the event with importance and usefulness.”
—Attendees, 15th Annual North Carolina/South Carolina/Georgia Tax Section Workshops

FINE PRINT • REGISTRATION
Registrations are limited by space, and may include a live video broadcast overflow room.

TRANSFERS
Registrants may transfer from a Live program, Video Replay, Webcast, Webinar or Phone/Audio Streaming Program without penalty within three business days after the program date. CANCELLATIONS
Cancellations must be received by 9:00 a.m. the third business day prior to the program to qualify for a refund (less $75 administrative fee). Those not attending will receive the digital program materials in full consideration of tuition paid. MCLE CREDIT
The North Carolina Bar Association Foundation is an accredited CLE sponsor under the MCLE Regulations promulgated by the NC State Bar Board of Continuing Legal Education. This program is approved (but not sponsored) by the Board for the designated number of CLE hours. Each attorney must maintain a record of his/her attendance for the NC State Bar annual report. MCLE credit is reported by NCBA Foundation only if a NC State Bar number is provided. Your CLE tuition includes mandatory State Bar fees used to support the State Bar’s Mandatory Continuing Legal Education program, the Chief Justice’s Commission on Professionalism and the Chief Justice’s Equal Access to Justice Commission. Your tuition also includes digital access to all program materials. DIGITAL PROGRAM MATERIALS
You will receive a notification email when digital materials are available to download. To retrieve digital materials, log in and select “Your Course Materials” on the CLE website. All of the materials for this program will be available for download in advance of the program. VIDEO REPLAYS
To qualify for the Early Bird tuition, registration must be received one week prior to program date. NC State Bar rules require a minimum number of preregistered active State Bar members. The NCBA Foundation reserves the right to cancel any video program prior to the program date if registrations do not meet the NC State Bar requirement. Some sites require additional registration or evaluation forms. Visit www.tinyurl.com/CLE623TSW to confirm video replay registration and program start times. CLE credit hours at Video Replays are subject to change. Video replay program attendees may purchase the printed manuscript at cost. Due to printing and shipping lead times we are unable to accommodate requests for print materials made fewer than seven (7) days prior to any video replay program.

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We make every effort to ensure that our programs are held in facilities which are fully accessible to persons with disabilities. If you plan to attend our program and need special facilities or assistance relating to a disability, please contact the CLE Department at least one week prior to the date of the program. INCREMENT WEATHER
We make every effort to notify registrants when a program is canceled or delayed due to weather. If inclement weather is forecast, please check your local news listings or contact event venue. NCBA programs will follow the work schedule of the hosting institutions, to include delayed openings.

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