

Tax Section of the Florida Bar

November 2018 E-Newsletter

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TAX SECTION
of the Florida Bar

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TOP NEWS

Register for these Upcoming CLEs!

AAA-CPA Fall Meeting & Education Conference

November 4 – 6, 2018 | The Confidante Miami Beach

[Click Here for More Information](#) | [Registration Form](#)

Questions about this event? Email meetings@attorney-cpa.com or call 703-352-8064 ext. 3.

3146R Opportunity Zones *Audio Webcast*

November 14, 2018 | 12:00 p.m. – 1:00 p.m.

Presented by James A. Schmidt, Tampa

[Click Here to Register](#)

Florida Bar Tax Section Luncheon with U.S. Tax Court Judge Vasquez

November 27, 2018 | The University Club (Downtown Tampa)

To Register: Email harringtonc@schmidtlawoffice.com

During this 1-hour CLE, Judge Vasquez will speak to members about How to Try Your Best Case Before the U.S. Tax Court. The Florida Bar Tax Section would like to thank JP Morgan for its generous financial support towards this event!

3145R International Tax: Recent Developments Concerning the GILTI and the Section 163(j) Interest Deductions' Limitations *Audio Webcast*

November 28, 2018 | 12:00 p.m. – 1:00 p.m.

Presented by James Barrett, Miami

[Click Here to Register](#)

3144R Regulatory Update Regarding the Partnership Audit Rules *Audio Webcast*

December 12, 2018 | 12:00 p.m. – 1:00 p.m.

Presented by Mitchell I. Horowitz, Tampa

[Click Here to Register](#)

From the Chair

Michael D. Minton



Since our return from the Fall Meeting in Washington, D.C. in September, our membership has been engaged to make the most of our meetings and contacts developed while in D.C.

Our Section was the first to give the IRS/Treasury authors of the proposed Regulations on Section 199A real-time feedback during our meetings with them, and Mike Wilson and Nick Gard led our webcast on those proposed Regulations in early October. The Section is currently drafting comments to submit.

The International Tax Committee (which shall soon become a free-standing Division of the Section) [submitted comments](#) on an issue raised while in D.C. within weeks of our return in order to capitalize on the foundation laid during our meetings on this issue. Specifically, the comment requested a regulatory clarification that a Code Section 250 deduction would be available to an electing shareholder that recognized a GILTI inclusion. The lead authors of the comment project were Steven Hadjilogiou, Michael Bruno, Keith Hagan and Shawn Wolf. Jim Barrett will be leading a Webinar on the new GILTI tax legislation on November 28, so [register now!](#)

Most recently, the IRS/Treasury issued proposed Regulations on Opportunity Zones under Section 1400Z, and one of the named authors and contacts for comments is one of our members, Kyle Griffin, who used to work for Dean Mead before heeding the call of Washington and the need for Regulation drafters hired by the IRS/Treasury post-enactment of the Tax Cuts & Jobs Act (TCJA) last year. These proposed Regulations will be the topic of discussion in an [upcoming webcast](#) presented by James Schmidt on November 14. The Section will also be drafting Comments based upon the white paper we submitted in September.

At the state level, French Brown, Director of the State & Local Tax Division, also drafted [comments to the Florida Department of Revenue](#) which we just submitted. The comments address issues on how Florida may implement TCJA piggyback revisions. Additionally, Andrew Comiter is chairing a Task Force to work with the Business Law Section and the Real Property, Probate, & Trust Law Section on anticipated new legislation that will revise and update the Florida corporations law chapter 607.

As you can see, the Tax Section is in high gear! Please let us know if there are any issues on which you would like to get actively engaged. There's never been a better time to be a Tax attorney!

Michael D. Minton, Chair

Dinner Meeting with Tax Court Special Trial Judge Guy

*The South Florida Tax Litigation Association invites the Florida Bar Tax Section to its
Dinner Meeting with Tax Court Special Trial Judge Guy*

Location: Morton's (1200 Brickell Ave. Suite 100E Miami, FL 33131)

Date/Time: November 27 | 6:30 p.m. (Networking) 7:00 p.m. – 9:00 p.m. (Dinner/Discussion)

Cost: \$100

Covers costs of open bar (wine/beer/soft drinks) and 3-course meal with meat/fish/vegetarian options.

To RSVP: Please email Ileana@lapekaslaw.com and she will send you a link for payment.

FICPA IRS Extension Request

Hurricane Michael affected numerous counties in Florida and many are still recovering and awaiting disaster assistance. Governor Rick Scott declared a State of Emergency for 35 Florida counties and President Trump issued a Major Disaster Declaration for Hurricane Michael. The Florida Institute of Certified Public Accountants (FICPA) and the Florida Bar Tax Section came together and submitted a letter to Senators Bill Nelson and Marco Rubio requesting they direct the IRS to move the October 15, 2018, filing deadline. Please visit the link below for a copy of the letter that was submitted. Also visit link below for the resulting tax relief offered by the IRS for victims of Hurricane Michael in Florida.

[FICPA/Tax Section Joint Letter
Tax Relief Offered by IRS for Victims of Hurricane Michael](#)

H. French Brown Explains Possible Florida Taxpayer Effects Due to Proposed Amendments

[Read More Here](#)

The full guest article was first published in *Law360* and is provided on the Dean Mead website with permission from *Law360*.



At the Table in Washington D.C.

Highlights from The Florida Bar Tax Section's Fall Meeting Scholarship Recipients



Phoebe Joseph, University of Florida

As a Florida Bar Tax Section scholarship recipient, I was afforded the opportunity to join the section at their fall meeting held in Washington, D.C. I was not sure what to expect going into this experience, but in the span of three days, I got to meet the members of the tax section, learn about the current tax issues, and explore our nation's capital.

Some of my favorite moments included the behind-the-scenes tour at the Smithsonian Museum of Natural History, enjoying the "Wilbur" during the Moonlight Monument Tour, the reception at the Occidental, and the meeting with the IRS and Treasury. As a current LLM student, I appreciated learning about the Tax Section's hot button issues regarding the TCJA. What was most interesting about this meeting was that the IRS attorneys took note of the Tax Section's statements and although they could not offer substantive information, they did express understanding over the issues mentioned.

Having this exposure to the Tax Section made me realize the importance of community, sharing expertise, and camaraderie in the legal profession. During this three-day meeting, I saw members share wonderful stories about their colleagues, collaborate to voice concerns regarding the TCJA, and enjoy all that D.C. had to offer. This experience has truly made me appreciate the legal profession, as well as look forward to becoming an active member in the Florida Tax Section.

Daniel Lader, University of Miami

Participating in the Florida Bar Tax Section 2018 Fall Meeting in Washington, DC was a great experience. One of the best takeaways was getting to know some of my local Florida colleagues who practice in diverse areas of tax law: lawyers who transitioned from public to private practice, international tax planners, tax litigators, and those who work in-house. It was interesting to see how tax policy can affect such a wide variety of different considerations for clients.



And it was an especially fortuitous time considering the vast overhaul of the Code in the TCJA. What will probably stick with me most is the idea that a major tax reform is usually a generational event. But in many ways, it's also a continuous event. Major reform demands new regulations and technical corrections that require input from practitioners with varying perspectives, which will dramatically influence the so-called tax reform 2.0 that largely determines the particular effects of the broad changes.

At the Table in Washington, D.C., continued

Taxation affects everyone and it's important to do our best to craft the right policy and improve it when we can. I feel lucky to have had a seat at the table to hear the thoughtful insight from some of the top practitioners in their fields. I am excited to see how the cookie crumbles and remain active within the Florida Bar Tax Section.

JUDGES NEEDED

2019 NATIONAL TAX MOOT COURT COMPETITION
MARCH 7 - 9, 2019
UNIVERSITY OF FLORIDA, GAINESVILLE
CLE CREDIT OFFERED

[Click Here for More Information](#)

Contact [Janette McCurley](#) if you'd like to participate!

Catch Up on Past CLEs!

Log into [The Florida Bar Members Portal](#) and the [InReach Catalog](#) to browse available CLE products and on-demand courses!



2558R | Tax Planning for Real Estate Developers & Investors

2587R | 36th Annual International Tax Conference

2636R | Are Death & Taxes Still Certain? Tax and Non-Tax Issues in Estate Planning

2620R | Annual Wealth Protection Seminar

2816R | Introduction to the 2017 Tax Cuts and Jobs Act

Tax Section Hall of Champions:

Bruce H. Bokor



The purpose of the Florida Bar Tax Section's "Hall of Champions" Interview Series is to record and preserve the wisdom of those lawyers who have meant so much to the development of tax law and policy in Florida.

This interview in the series is with Bruce H. Bokor, former Chair of the Tax Section and co-recipient of the Tax Section's 2018-2019 Gerald T. Hart Outstanding Tax Lawyer of the Year award.

Mr. Bokor practices with the Johnson Pope law firm in Clearwater, Florida. [Click here](#) for more information about Mr. Bokor.

Interviewed by Ileana Garcia (www.LapekasLaw.com).

Listen:

[Click here to listen on your iPhone](#)

[Click here to listen on your Android phone or web browser](#)

Summer 2018 Issue of the Tax Section *Bulletin* Now Available

Check Out These Articles:

- Tax Section Active in Protecting Tax and Business Planning from Effects of Comments to UVTA
- Considering Expatriating? Now Might Be the Perfect Time
- Taxpayer Rights in Florida: New Opportunity for Meaningful Reform
- Federal Income Tax Incentives Under the New Qualified Opportunity Zone Regime
- The New Participation Exemption: An Opportunity to Convert Ordinary Dividends into Qualified Dividends
- AND MORE!

Tax Section Speaker's Bureau and *Member Resources* Page

The first Speaker's Bureau materials are now posted to a new, private Member Benefit's section of the Section's website, but due to inquiries received we are also providing the materials links to our members here. Be sure to log in to the [Member Resources](#) page using the following credentials:

Username: TaxSectionMember
Password: t@xM3mb3r!1234

Both the [short](#) and [detailed](#) handouts concern proposed Florida Constitutional Amendments 1, 2 & 5 that have tax implications on the ballot this November to assist in educating the voters (without taking a position for or against) and to promote informed political engagement at the polls. These materials provided by the Tax Section Speaker's Bureau provide our members with an excellent opportunity to get out into the public sphere and enhance their speaking profiles and visibility as tax attorneys in their communities. Regardless of whether you practice in state and local taxation, we encourage you to use these materials to educate yourself and the public on these timely and important issues.

The Florida Bar Tax Section Speaker's Bureau was first instituted in the 1950's to encourage members of the newly formed Tax Section to educate the public about matters of significance to the tax community by speaking to civic organizations, clubs and as guests on radio talk shows. With the reincarnation of this member benefit we will provide tax attorneys throughout Florida with access to high quality pre-drafted speeches regarding important tax and legislative matters. Stay tuned for more materials to come in the future. For more information, please contact [Dana Apfelbaum](#).



Tax Section *Bulletin* Submissions

The Summer Edition of the Florida Bar Tax Section Bulletin was published and circulated in August 2018. We intend to publish a Fall Edition of the Florida Bar Tax Section *Bulletin* for circulation in December 2018 **and need short articles for publication in the *Bulletin*.** Please contact Michael Bruno at mjbruno@mwe.com for article spots. The deadline for submission is **November 15, 2018.**

Florida Bar Journal Articles

The Florida Bar Journal has openings for tax articles for the September 2019 (**June 15, 2019 deadline**) onward. Please email Taso Milonas at tmilonas@wealthlawgroup.com or Charlotte Erdmann at Charlotte@erdmannlaw.com if you are interested.

[Click here](#) to access *The Florida Bar Journal* archives!



Tax Section Comments on IRS Regulation Projects

Let your voice be heard. The Tax Section provides comments on proposed treasury regulations that are of interest to its members. If you see proposed regulations and would like to work together with other Tax Section members on comments, contact Brian Harris at brian.harris@akerman.com.

Pro Bono Volunteer Opportunities

Florida's Low Income Taxpayer Clinics (LITCs) assist low income taxpayers with IRS controversies, including, collections, liability disputes and Tax Court petitions. Studies show that representation significantly increases positive outcomes for low income taxpayers. If interested in representing a low income taxpayer, please directly contact the LTC nearest you (for a complete list of the LITCs in Florida, go to www.lsgmi.org and click on Low Income Taxpayer Clinic under Quick Links).

Volunteers needed for the U.S. Tax Court Pro-Bono Calendar Call Program. NOW SERVING TALLAHASSEE. The Program is designed to have local tax practitioners volunteer their time to pro se taxpayers during calendar call sessions without entering their name as the attorney of record. If you are interested in participating in the Calendar Call Program, please contact one of the following Tax Section members:

Miami | Karen Lapekas, 305-600-1485, karen@lapekaslaw.com

Tampa | Mitchell Horowitz, 813-222-1105, mitchell.horowitz@bipc.com

Jacksonville | Harris L. Bonnette, Jr., 904-356-2600, hbonnette@fishertousey.com

Tallahassee | Jami Coleman, 850-222-0013, jcoleman@williamscoleman.law

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