

Tax Section of the Florida Bar

November 2017 E-Newsletter

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MEETINGS

(SAVE THESE DATES)

36th Annual International Tax Conference

January 10th through 12th

JW Marriott Miami

1109 Brickell Avenue



Click on link for hotel reservations: [Hotel Reservations](#)

[Click here to register and view the agenda.](#)

[You can also click here to register to participate via webcast.](#)

DOR/Tax Section Liaison Meeting

The Florida Department of Revenue and the Tax Section have scheduled a liaison meeting for **Wednesday, March 21, 2018.**

The meeting will take place in the morning at **DOR headquarters in Tallahassee.** All Tax Section members are invited.

Please save the date and watch this bulletin for more information. You can contact Steve Hogan (shogan@ausley.com) with any questions.

2018 Annual Meeting

April 21, 2018

Ritz-Carlton, Sarasota

2018 Organizational Meeting

July 3-7, 2018

Omni Plantation Resort, Amelia Island

2018 Fall Meeting

September 18-21, 2018

JW Marriott, Washington DC

PHONE CLE'S

Topic: IRS Tax Relief for Casualty Hurricane Victims (Both Individual & Business)

Division: Fed Tax Division of the Tax Section of the Florida Bar

Date: November 15, 2017 from 12:00 – 1:00 p.m.

Speaker: Michael Anidjar, Esq. and Sarah Montello, Esq (Moffa, Sutton and Donnini, P.A.)

The CLE will be free and worth 1 credit.

[Click Here to Register](#)

Topic: New Regs under 707 and 752

Division: Fed Tax Division of the Tax Section of the Florida Bar

Date: November 29, 2017 from 12:00 – 1:00 p.m.

Speaker: Collin Clark

The CLE will be free and worth 1 credit.

[Click Here to Register](#)

ANNOUNCEMENTS

On November 8, 2017, the Tax Section will welcome Julia Chu, Executive Director of JP Morgan Private Bank's New York City Office, to Tampa for lunch at the University Club. Julia has over 25 years of experience as a philanthropy advisor and has hosted many major client relationships.

She will spend her time discussing pre-liquidity charitable giving, and some of the techniques that planners use to manage business appreciation and tax exposure upon a liquidity event and how this proverbial “perfect storm” can be abated through timely charitable planning.

Some of the topics will include the advantages of donating stock pre-liquidity and other timing considerations; guidelines for donating privately held, publicly traded and C corporation stock subject to restriction; considerations for donating S corporation stock; and the optimal charitable vehicles for receiving gifts of corporate stock.

If you would like to attend, the lunch is free of charge, thanks to the generous support of the JP Morgan Private Bank. Please contact James Schmidt at

jas@schmidtlawoffice.com if you are interested.

Florida Bar Tax Section Directory

The Tax Section Directory is being finalized. Include or revise your areas of tax concentration here: <https://goo.gl/forms/4sdOD3ofjh7QJ1r72>

2018 Tax Moot Court Competition – Judges Needed

2018 National
Tax Moot Court Competition
Feb 1 - Feb 3, 2018
JUDGES NEEDED
The Don CeSar
3400 Gulf Blvd, St. Pete Beach, FL
CLE Credit Offered
Contacts:
Justin Wallace - justin.wallace@hwlaw.com
Brian Howsare - brian.howsare@us.gt.com
TAX SECTION
of The Florida Bar

Florida Bar Journal Articles

The Florida Bar Journal has openings for tax articles, particularly: June 2018 issue with a March 15, 2018 deadline, July/August 2018 issue with an April 15, 2018 deadline, September

2018 issue, deadline likely to be July 15, 2018. Please email Charlotte Erdmann at charlotte@erdmannlaw.com.

Announcing the Tax Section Podcast!

The Tax Section has launched a Podcast!

Check it out in iTunes or Stitcher at the links below:

iTunes (click while on your iPhone or iPad): <https://itunes.apple.com/us/podcast/the-florida-bar-tax-section-podcast/id1244095897?mt=2>

Stitcher (click in your browser; on Android phones, it may require a free app download): <http://www.stitcher.com/podcast/the-florida-bar-tax-section/florida-bar-tax-section>

Please “subscribe” to the podcast to get new episodes each time they are released.

Tax Section Comments on IRS Regulation Projects

The Tax Section has submitted comments to the Partnership Audit Proposed Regulations. The Tax Section’s comments are posted on our website at: <http://floridatallaxlawyers.org/publications/commentary/>

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.

The Tax Section is currently finalizing comments on the **Requested Exclusion of FIRPTA Reorganizations from Corporate Inversion Rules**. The principal covered Code Sections are 7874 and 897. Participants include: Jim Barrett, Steve Hadjilogiou, Jeff Rubinger, Joe McFarland, James Schmidt, Summer LePree, Ceci Hassan, Bobby Moore, Michael Bruno, Adam Smith, Alfredo Tamayo, Hans Tanzler IV, Shawn Wolf, and Leslie Share. Please submit your comments as this project will be final soon.

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 LITC 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. 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: For Miami, please contact Karen J. Lapekas at 305-600-1485 or karen@lapekaslaw.com. For Tampa, please contact Mitchell Horowitz at 813-222-1105 or mitchell.horowitz@bipc.com.

The Program will soon be expanding to include calendar call sessions held in Jacksonville and Tallahassee. For Jacksonville, please contact Harris L. Bonnette, Jr. at (904) 356-2600 or hbonnette@fishertousey.com. We will be providing more details for those wishing to participate in Tallahassee.

Fed Tax and State Tax Listserv's

The Tax Section has made Listserv's available to members to exchange ideas, opinions, information, and comments in a positive and professional environment. The Tax Section Listserv sign up, how the Tax Section Listserv works and the applicable rules for participants can be found at <http://floridatlawyers.org/listserv/>.

Federal Tax Division Information

The Federal Tax Division recognizes the following members for their reports at the Fall Meeting in Miami: David M. Silberstein (*Estate Planning & Exempt Organizations*); Michael Lampert (*Tax Controversy & Procedure*); Mauricio Rivero and Michael Bruno (*International*); Taso Milonas (*Business Organizations and Individuals*); and James Barrett (*Comments*). Mitch Horowitz gave a presentation on

comments that were submitted to the IRS on behalf of the Section on the new Centralized Partnership Audit Regime. In addition, a special thanks goes out to the many committee members who contributed to their respective committee's reports.

The Federal Tax Division will convene again at the Spring Meeting at the Ritz-Carlton in Sarasota on April 21, 2018. We look forward to hearing from our committee leadership on developments in the federal tax realm and encourage you to attend and participate.

If you are interested in serving on the committees or subcommittees, or becoming more active in the Federal Tax Division, please send an email to one of the Co-Directors, James A. Schmidt at jas@schmidtlawoffice.com or Taso Milonas at tmilonas@wealthlawgroup.com.

Sponsors

The Tax Section thanks the following businesses for supporting Tax Section activities:

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Florida Bar Tax Section Bulletin

The Spring Edition of the Florida Bar Tax Section Bulletin will be published and circulated in March. Articles for the Spring Edition of the Florida Bar Tax Section Bulletin are due by **February 15, 2018**. Please contact Michael Bruno at michael.bruno@bakermckenzie.com to secure a spot.

**Questions or comments, please email Chris Hargrett at
chargrett@flabar.org or visit our website at
www.floridataxlawyers.org**