MAURICE A. DEANE SCHOOL OF LAW
HOFSTRA LAW

Meltzer Lippe

2016

PRIVATE WEALTH & TAXATION INSTITUTE

Continuing Professional Education Series

PRESENTED BY

MAURICE A. DEANE SCHOOL OF LAW
HOFSTRA UNIVERSITY
AND
MELTZER, LIPPE, GOLDSTEIN & BREITSTONE, LLP

Day 1 - May 19, 2016

Day 2 - May 20, 2016

Sessions run from 9:00am – 5:00pm
Maurice A. Deane School of Law at Hofstra University
Registration: $50 Per Person/Per Day (in advance/non-refundable)
$75 Per Person/Per Day (at door)
(includes breakfast and lunch)
Limited seating. CLE/CPE Credit and Webinar available

Live program is transitional and appropriate for both experienced and newly admitted attorneys.
Webinar is non-transitional and appropriate for experienced attorneys only.

RSVP by May 9, 2016
events@meltzerlippe.com

WHO SHOULD ATTEND
Real Estate & Business Owners
Attorneys, CPAs
Financial Advisors

PROGRAMS HELD AT:
121 Hofstra University-Room 308
Hempstead, New York 11549
PLEASE SEE PAGE 5 FOR DIRECTIONS TO EVENT

2016
PRIVATE WEALTH & TAXATION INSTITUTE

Schedule

AM SESSION

THURSDAY, MAY 19 — 3.5 CLE/CPE

8:00 – 8:30 Breakfast and Sign In

8:30 – 8:45 Introduction to Program
Stephen M. Breitstone

8:45 – 9:45 Estate Planning through an Asset Protection Lens
Gideon Rothschild

9:45 – 10:45 Current Developments in Estate Planning
Sharon L. Klein, Mary P. O'Reilly and Sanford J. Schlesinger

10:45 – 11:00 Break

11:00 – 12:00 Cross Border Tax Planning – Structuring Foreign Investment in U.S. Real Estate
Alan I. Appel, Stephen M. Breitstone and Phillip S. Pepper

12:00 – 1:00 Lunch

PM SESSION

THURSDAY, MAY 19 — 4.5 CLE/CPE

1:00 – 2:00 The Delaware Trust Option for New York, New Jersey and Connecticut Residents
Richard W. Nenno

2:00 – 3:00 Estate Planning with Grantor Trusts – Storm Clouds on the Horizon
Stephen M. Breitstone, Robert L. Goldfarb, David C. Jacobson and Barry L. Sunshine

3:00 – 3:15 Break

3:15 – 4:15 Using Partnerships to Maximize Basis in Estate Planning
Professor Jerome M. Hesch and Paul L. Lee

4:15 – 5:15 Rethinking the Fabric of Estate Planning
Amy F. Altman and Avi Z. Kestenbaum

Question and Answer period will follow each topic

2016
Private Wealth & Taxation Institute

Schedule (Continued)

AM SESSION

FRIDAY, MAY 20 — 3.5 CLE/CPE

8:00 – 8:30	Breakfast and Sign In
8:30 – 8:45	Introduction to Program *Stephen M. Breitstone*
8:45 – 9:45	The Full Price of a Mistake: Tax Penalties, Transferee Liability and Fiduciary Liability *Megan L. Brackney and Bryan C. Skarlatos*
9:45 – 11:00	Meet Your Taxpayer Advocate: Major Challenges Facing Taxing Authorities and the Taxpayer Advocate's Role in Assisting Taxpayers *IRS Service Taxpayer Advocate Nina E. Olson, NYS Taxpayer Rights Advocate Margaret Neri, NYC Taxpayer Advocate Diana Leyden, Robert N. Brown, CPA and Laurie B. Kazenoff*
11:00 – 11:15	Break
11:15 – 12:15	Surrogate's Court Practice Update *Hon. John M. Czygier, Jr., Eric W. Penzer, Hon. A. Gail Prudenti and Jason J. Smith*
12:15 – 1:30	Lunch with Guest Speaker Jeffrey Goldenberg, Managing Director of the Portfolio Advisory Group at Goldman Sachs, will be speaking on "Economic and Financial Markets Outlook - What Lies Ahead"

PM SESSION

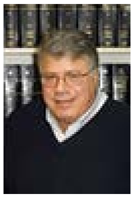
FRIDAY, MAY 20 — 3.5 CLE/CPE (1 in Ethics)

1:30 – 2:30	Coming Clean with Offshore Accounts – The Current Status of Voluntary Offshore Disclosure *Professor Linda Galler, Kelly A. McGowan and Mordy Serle*
2:30 – 3:30	Developments in Income Taxation of Real Estate, Capital Gains Taxation and 1031 Exchanges *Professor Bradley T. Borden, Glenn M. Johnson and Mark E. Wilensky*
3:30 – 4:30	*Recent Changes in the Regulation of Tax Practice and Ethics* *Professor Linda Galler*

Questions and Answer period will follow each topic

PRIVATE WEALTH & TAXATION INSTITUTE FACULTY

DIRECTOR



Stephen M. Breitstone – is a partner and Vice Chairman of Meltzer Lippe, Director of the Private Wealth & Taxation Institute, Chair of the Private Wealth & Taxation Group at Meltzer Lippe and STEP Long Island's Co-Chair. The Private Wealth & Taxation Group includes both the Tax Group and Trust & Estates Group. Steve handles domestic and international, income estate and gift tax planning for high net worth individuals, closely held businesses and real estate owners; 1031 Exchanges, income taxation of corporate mergers and acquisitions; taxation of workouts and bankruptcies; federal, state and local tax procedure and controversies. Steve is on the advisory board of the New York Institute on Federal Taxation and a Fellow of the American College of Tax Counsel. *LL.M. Tax, NYU; J.D., Cardozo School of Law; Adjunct Professor at Cardozo School of Law.*

GOVERNMENT SPEAKERS

Nina E. Olson – Internal Revenue Service Taxpayer Advocate, the National Taxpayer Advocate, is the voice of the taxpayer at the IRS and before Congress. Under her leadership, the Taxpayer Advocate Service helps hundreds of thousands of people every year resolve problems with the IRS and addresses systemic issues within the IRS. Her Annual Report to Congress identifies the most serious problems facing taxpayers and recommends solutions.

Margaret Neri - Taxpayer Rights Advocate and Ethics Office, she was appointed New York State Taxpayer Rights Advocate in July 2014. Margaret also serves as the Tax Department's Ethics Officer, providing guidance to managers and supervisors and training for employees across the state.

Diana Leyden – Diana was appointed Special Trial Judge with the United States Tax Court as of June 2016 and has an extensive career in tax advocacy. Diana joined the New York City Department of Finance to open and head the Office of the Taxpayer Advocate in July 2015. Before joining city government, she was the founder and director of the University of Connecticut School of Law Tax Clinic — a free legal service that helps low-income taxpayers with tax problems — which she led since 1999. *LL.M. in Taxation, Georgetown University; J.D., UConn Law.*

Hon. John M. Czygier, Jr. – Judge of the Surrogate's Court, Suffolk County was admitted to practice law in New York State in 1975. After serving as a prosecutor in the Suffolk County District Attorney's office, he entered private practice and, for 25 years, concentrated in estate administration and estate litigation in the New York metropolitan area. He is a member of the Suffolk County Bar Association, where he served as Director, Chair of the Surrogate's Court Committee and Co-Chair of the Bench Bar Committee. *J.D., Hofstra University School of Law.*

FACULTY

Amy F. Altman - is an associate of the Private Wealth & Taxation Group at Meltzer Lippe. Amy focuses on estate and trust administration, estate planning, and probate litigation. She prepares wills, durable powers of attorney, and health care proxies and various types of trusts, including supplemental needs trusts. *J.D., Brooklyn Law School.*

Professor Alan I. Appel – is a professor at New York Law School. He specializes in international and domestic tax planning involving taxation of mergers and acquisitions, partnerships, joint ventures, limited liability companies and tax controversy matters. Prior to joining New York Law School, he spent 13 years in the New York office of Bryan Cave LLP. *LL.M., NYU, J.D., New York Law School.*

Bradley T. Borden - is a Professor of Law at Brooklyn Law School, where he teaches Federal Income Taxation, Partnership Taxation, Taxation of Real Estate Transactions, and Unincorporated Business Organizations. Before entering the legal academy, he practiced law at Oppenheimer, Blend, Harrison & Tate, Inc., in San Antonio, Texas, and now frequently works as an expert witness or consultant in cases related to partnership and real estate taxation. He is also Of Counsel with the New York law firm Tjong & Hsia, LLP. *LL.M. and J.D., University of Florida.*

Megan L. Brackney – Megan is a partner at Kostelanetz & Fink and concentrates her practice in the areas of tax controversies, and civil and white collar criminal litigation. Megan is a former Assistant United States Attorney for the Southern District of New York. Ms. Brackney is a member of the New York State Bar Association Tax Section's Executive Committee, a Fellow of the American College of Tax Counsel, a Council Director for the American Bar Association Section of Taxation, and the former Chair of the Taxation Committee of the New York County Lawyers' Association. *LL.M. in Taxation, NYU, J.D. from the University of Kansas School of Law.*

Robert N. Brown CPA, CGMA - Robert has spent more than 35 years in public practice serving small to middle market companies and individuals in the areas of tax preparation, tax planning, tax controversy, estate planning, multi-state taxation, tax representation, financial statement preparation and management advisory services.

PRIVATE WEALTH & TAXATION INSTITUTE FACULTY

Linda Galler - Linda Galler is a Professor of Law at the Maurice A. Deane School of Law at Hofstra University, where she teaches a variety of tax courses. Professor Galler also is the Director of the Hofstra Federal Tax Clinic, representing low income taxpayers in federal and state tax controversies and litigation. Professor Galler is Senior Tax Counsel to the New York City law firm Curtis, Mallet-Prevost, Colt & Mosle LLP, where she consults in international taxation, corporate taxation, administrative practice and court procedure. *LL.M., NYU, J.D., Boston University.*

Robert L. Goldfarb, CPA, PFS, CGMA, CFE, DBAFA, DBAFE – Bob is a Principal of Janover, LLC and past President of the National Conference of CPA Practitioners and served as Chair of their National Tax Policy Committee and their National Issues Committee for several years. He recently completed a 3 year term on the governing council of the American Institute of CPAs and is an active member of the NYS Society of CPAs where he served as a member of several of their committees including the Executive Board of the Nassau County Chapter.

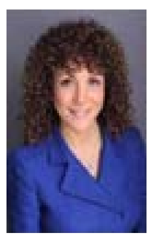
Jerome M. Hesch - serves as a tax and estate planning consultant for lawyers and estate planning professionals throughout the country and acts as Special Tax Counsel to Oshins & Associates in Las Vegas Nevada and Meltzer Lippe. He is the Director of the Notre Dame Tax and Estate Planning Institute, on the Tax Management Advisory Board, a member of the American College of Trusts and Estates Council (ACTEC) and the American College of Tax Council. He has published numerous articles, Tax Management Portfolios, and co-authored a law school casebook on Federal Income Taxation, now in its fourth edition. *J.D., State University of New York at Buffalo.*

David. C. Jacobson - is counsel in the Private Wealth & Taxation Group at Meltzer Lippe. David has worked with entrepreneurs and business owners for his entire career. His common sense approach and his comprehensive knowledge of tax, estate planning, family governance and philanthropy, allow him to counsel families effectively. *LL.M., Georgetown University; J.D., University of Miami.*

Glenn M. Johnson – is a Principal in Ernst & Young LLP's US National Tax Department, and the Director of the Leasing Tax Services. Glenn is experienced in planning leasing and other asset-based structured transactions. In the past several years, he has provided US tax services with respect to many infrastructure projects. In addition, Glenn has significant experience concerning deferred like-kind exchange transactions where he advises on a wide range of tax and operational issues.

Laurie B. Kazenoff – is counsel in the Private Wealth & Taxation Group at Meltzer Lippe. Former Senior Attorney, IRS Office of Chief Counsel; Laurie has over 30 years of experience in IRS and NYS tax controversies including audits, appeals, litigation, offers in compromise, installment agreements, levies, liens, sales & use tax, employment tax, responsible person assessments, NYS residency, employee benefit plans, exempt organizations. *LL.M. and J.D., Temple University Beasley School of Law.*

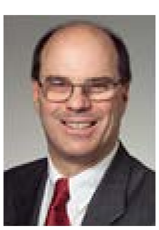
Avi Z. Kestenbaum – is a partner of the Private Wealth & Taxation Group at Meltzer Lippe and co-chairs the Trust & Estates Group. Avi provides creative and sophisticated domestic and international, income, estate and gift tax planning for high net worth individuals, closely held businesses and real estate owners; business succession and asset preservation planning; charitable, philanthropic and tax exempt organizations. Avi is an ACTEC Fellow and listed in Super Lawyers and Best Lawyers in America and an Adjunct Professor at Hofstra University School of Law. *LL.M. Tax, University of Miami; J.D., Brooklyn Law School.*



Sharon L. Klein – Sharon is President of Wilmington Trust, N.A. in the New York Metropolitan Region, responsible for overseeing all Wealth Advisory Services. She has over 20 years' experience in the wealth advisory arena and is a nationally recognized speaker and author on trust & estate issues, having spoken for many professional organizations, including the Heckerling Institute on Estate Planning, the New York University Institute on Federal Taxation, and the Bloomberg BNA Tax Management Advisory Board. Sharon serves as Chair of the Trusts and Estates Law Section Taxation Committee of the New York State Bar Association and Vice-Chair of the Estate & Gift Tax Committee of the American Bar Association. She is a member of New York Bankers Association Trust & Investment Division Executive Committee, The Rockefeller University Committee on Trust and Estate Gift Plans and the Estates, Gifts and Trusts Advisory Board for The Bureau of National Affairs.

Paul S. Lee - is a Managing Director and Senior Regional Wealth Advisor with The Northern Trust Company. Prior to joining Northern Trust, he was at Bernstein Global Wealth Management as National Managing Director, and a partner in the Atlanta-based law firm of Smith, Gambrell & Russell, LLP.

Kelly A. McGowan – is an associate in the Private Wealth & Taxation Group at Meltzer Lippe. Kelly assists individuals and families in the preservation and transfer of wealth by creating estate plans that provide for and protect her client's loved ones and secure their wealth for future generations. She also counsels clients in estate and tax planning for foreign assets and navigates clients through the ever-changing foreign asset disclosure programs. *B.A., Wake Forest University; J.D., Hofstra University School of Law.*



Richard W. Nenno – is a Senior Managing Director and Trust Counsel in Wealth Advisory Services at Wilmington Trust Company in Wilmington, Delaware. Dick has nearly 40 years of estate planning experience and is admitted to the practice of law in Delaware and Pennsylvania. *A.B., Princeton University, J.D., Harvard Law School.*

Mary P. O'Reilly - is a partner in the Private Wealth & Taxation Group at Meltzer Lippe. Mary assists individuals and families in the preservation and transfer of wealth and philanthropic planning. Her clients include family business owners, real estate developers, tax exempt organizations, investment bankers, private equity fund managers, physicians, inventors, entertainers, business professionals, retirees, non-resident aliens, domestic partners and those of inherited wealth. *LL.M., NYU; J.D., St. John's University.*

PRIVATE WEALTH & TAXATION INSTITUTE FACULTY

Eric W. Penzer - is a partner of Farrell Fritz concentrating in trust and estate litigation. His practice includes contested probate proceedings, fiduciary accounting proceedings, discovery proceedings, and other litigation related to estates and trusts. Eric is a frequent author of articles on trust and estate litigation practice and lectures extensively on the subject. *J.D., Fordham University.*

Phillip S. Pepper - is a partner in the Private Wealth & Taxation Group at Meltzer Lippe. Phillip advises on the tax aspects of business and investment transactions. In addition, Phillip represents clients in tax controversies with the IRS and New York State. Phillip's practice focuses on the tax aspects of forming, operating, and exiting different forms of business entities, including partnerships, limited liability companies, joint ventures, corporations, private equity and other investment funds, and real estate investment trusts. *LL.M. Tax, NYU; J.D., The George Washington University; B.A., University of California, Berkeley.*

Honorable A. Gail Prudenti – A. Gail Prudenti was named Executive Director of the Center for Children, Families and the Law at the Maurice A. Deane School of Law at Hofstra University, where she also serves as Special Advisor to the Dean. Judge Prudenti is an accomplished administrator and an experienced supervisor of large-scale court operations, including one of the largest statewide court systems in the United States, as well as one of the busiest appellate courts in the nation. *LL.B, University of Aberdeen, Scotland, UK; B.A., Marymount College of Fordham University.*

Gideon Rothschild - As Chair of Moses & Singer's Trusts & Estates and Wealth Preservation practices, Gideon focuses on domestic and international estate planning and asset protection. He is a nationally recognized authority on the use of offshore trusts and estate planning strategies for wealth preservation and succession planning. He is an ACTEC Fellow and Immediate Past Chair of the RPTE Section of the American Bar Association. *J.D. New York Law School (with honors); CPA; CFP.*

Sanford J. Schlesinger - Sanford ("Sandy") J. Schlesinger is a founding partner of the law firm of Schlesinger Gannon & Lazetera LLP. Mr. Schlesinger is a nationally recognized expert in the areas of estate and tax planning, estate administration, family-owned business planning, charitable planning and all related areas. He also handles all aspects of contested and litigated estate, trust and related tax matters. *J.D., Fordham University, B.S. (with honors), Columbia University.*

Mordy Serle - is an associate in the Private Wealth & Taxation Group at Meltzer Lippe. Mordy concentrates his practice in state and tax planning, estate administration and wealth preservation and philanthropic planning. Mordy has counseled clients on sophisticated planning techniques that have resulted in substantial tax-efficiencies and savings from federal and state gift, estate, generation-skipping transfer and income taxes. *J.D., Columbia University.*

Jason J. Smith - is a partner in the Private Wealth & Taxation Group at Meltzer Lippe. Jason focuses his practice on trusts & estates litigation, estate planning, and estate and trust administration. Jason practices in the Surrogate's Court on a wide range of litigated matters, including contested will and probate proceedings, fiduciary removal proceedings, trust construction cases, contested accounting proceedings, claims against estates, discovery and turnover proceedings and conservatorships and guardianship matters. *J.D., Yale Law School*.

Bryan C. Skarlatos - is a partner at Kostelanetz & Fink, LLP. Brian is co-chair of the annual NYU Tax Controversy Forum and chair of the annual Practicing Law Institute program on "Nuts and Bolts of Tax Penalties." He is also an Adjunct Professor at NYU School of Law where he teaches a course on Tax Penalties and he has taught several courses on tax procedure, penalties and ethics to various offices of the IRS. *LL.M., NYU, J.D., Pennsylvania State University.*

Barry L. Sunshine CPA, CGMA - Barry is a Senior Tax Partner of Janover LLC and specializes in providing sophisticated tax planning to closely held businesses and their owners. His experience covers income and estate tax planning including succession planning for businesses and structuring business purchases and sales. Also, he has extensive experience handling tax controversies with the Internal Revenue Service and various State and local governmental agencies.

Mark E. Wilensky - is a partner in the Private Wealth & Taxation Group at Meltzer Lippe. Prior to joining the firm Mark was a tax attorney in the New York City office of Roberts & Holland LLP for 12 years. A large part of Mark's practice involves advising clients looking to sell, exchange, lease, or refinance real estate and take advantage of the tax deferral opportunities offered by section 1031 exchanges, installment sales, and long-term lease agreements. Mark is an Adjunct Professor at Cardozo School of Law. *LL.M. Tax, NYU; J.D., Columbia University; M.A., University of Chicago.*

MAURICE A. DEANE SCHOOL OF LAW
HOFSTRA LAW

To the students, alumni, faculty and staff of the Maurice A. Deane School of Law at Hofstra University, the law is not just something to be studied — it is to be lived. It informs our careers, our lives and our interactions with fellow citizens. It is the means by which we make an impact in the world. Courts, law firms and employers recognize the significance of a Juris Doctor (J.D.) from Hofstra Law, or a degree from our joint J.D./M.B.A. and J.D./M.P.H. programs, because they know our graduates are renowned for their legal knowledge, preparedness and poise.

★ ★ ★ ★ ★

ML Meltzer Lippe

Meltzer Lippe is a law firm combining the best features of small firms with lawyers from major Metropolitan law firms. It functions in a full range of business areas: tax, corporate, real estate, labor and employment, commercial litigation and social media and privacy law, as well as wealth planning for high net worth individuals and trusts and estates.

★ ★ ★ ★ ★

STEP
Long Island
ADVISING FAMILIES ACROSS GENERATIONS

STEP is the worldwide professional association for those advising families across generations. STEP's mission is to help families plan their assets across generations by promoting high professional standards; educating professionals; connecting advisors and families globally; informing public policy; and acting in the public interest. For more information or to become a member of The Society of Trust and Estate Practitioners please visit our website www.step.org or contact Stacey Harris, STEP Long Island Coordinator at STEPLongisland@mlg.com

SPONSORSHIP OPPORTUNITIES AVAILABLE

Interested in becoming a sponsor for the 2017 Private Wealth & Taxation Institute?

Email us at: events@meltzerlippe.com

2016
PRIVATE WEALTH & TAXATION INSTITUTE

COURSE MATERIALS:

1- You may download the handout and PRINT prior to attendance.

2- You may pick up USB thumb drive on day of event during check-in.
LIMITED QUANTITY AVAILABLE.

3- A printed handout may be purchased on day of event at check in for $10.
LIMITED QUANTITY AVAILABLE.

DIRECTIONS TO HOFSTRA:

While most may use GPS, *please* follow the directions below to properly guide you to the event location on the Hofstra campus:

From Meadowbrook Parkway heading north: Take Meadowbrook Parkway North to Exit M4, Hempstead Turnpike (Route 24) West (the sign will say, "Hempstead and Coliseum"). Stay on **Hempstead Turnpike** to **California Avenue** (which is the traffic light just before the 2nd covered walkway over Hempstead Turnpike and just after the **Dunkin' Donuts** on your left).

Make a left onto California Avenue and follow the directions below. **From California Avenue to Koppelman Hall:** Go past the first stop sign on California Avenue. When you see **Au Bon Pain** on your **RIGHT**, continue past the restaurant. Koppelman Hall is on your **RIGHT**. Parking is available in front of Koppelman Hall. Again, building will be on **YOUR RIGHT.**

2016
PRIVATE WEALTH & TAXATION INSTITUTE

Kindly RSVP below
if paying by check

Sessions run from 9:00am – 5:00pm

NAME ______________________________________
(Please Print)

☐ I will attend Day 1 – May 19, 2016

☐ I will attend Day 2 – May 20, 2016

☐ I will attend Day 1 via Webinar May 19, 2016

☐ I will attend Day 2 via Webinar May 20, 2016

☐ Dietary restrictions (if any):

$50 Per Person/Per Day (in advance/non-refundable)
$75 Per Person/Per Day (at door)
(includes breakfast and lunch)

Please make Checks *Payable to*
Private Wealth & Taxation Institute Ltd.
c/o Meltzer, Lippe, Goldstein & Breitstone, LLP
190 Willis Avenue, Mineola, NY 11501

Enclosed is a check in the amount of $ ______________

Maurice A. Deane School of Law at Hofstra University
Limited seating. CLE/CPE Credit and Webinar available
Live program is transitional and appropriate for both experienced and newly admitted attorneys.
Webinar is non-transitional and appropriate for experienced attorneys only.

Fold Here

POSTAGE
HERE

Private Wealth & Taxation Institute
c/o Meltzer, Lippe, Goldstein & Breitstone, LLP
190 Willis Avenue
Mineola, New York 11501

Fold Here

2016
PRIVATE WEALTH & TAXATION INSTITUTE

Kindly RSVP below if
paying by credit card

Sessions run from 9:00am – 5:00pm

NAME: ______________________________
(Please Print)

☐ I will attend Day 1 – May 19, 2016
☐ I will attend Day 2 – May 20, 2016
☐ I will attend Day 1 via Webinar May 19, 2016
☐ I will attend Day 2 via Webinar May 20, 2016

☐ Dietary restrictions (if any):

$50 Per Person/Per Day (in advance/non-refundable)
$75 Per Person/Per Day (at door)
(includes breakfast and lunch)

Maurice A. Deane School of Law at Hofstra University
Limited seating. CLE/CPE Credit and Webinar available
Live program is transitional and appropriate for both experienced and newly admitted attorneys.
Webinar is non-transitional and appropriate for experienced attorneys only.

If paying by credit card, complete all requested information below.

☐ VISA ☐ MasterCard ☐ DISCOVER

CARD NUMBER	SIGNATURE CODE
SIGNATURE	EXP DATE
ADDRESS ASSOCIATED WITH CREDIT CARD	CITY

Fold Here

POSTAGE
HERE

Private Wealth & Taxation Institute
c/o Meltzer, Lippe, Goldstein & Breitstone, LLP
190 Willis Avenue
Mineola, New York 11501

Fold Here