

# ATLANTA

## 39th Annual Tax & Business Planning Seminar

### Where:

The Westin Perimeter  
7 Concourse Pkwy  
Atlanta, Georgia 30328

### When:

Tuesday, November 12, 2024

Registration: 11:30 a.m.

Presentations: 12:00 p.m - 5:00 p.m.  
(Lunch included)

Reception: 5:00 p.m. - 6:00 p.m.



Chamberlain Hrdlicka  
Attorneys at Law

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# Atlanta's 39th Annual Tax & Business Planning Seminar

## Schedule:

11:30 a.m. - 2:00 p.m.	Registration
12:00 p.m. - 2:50 p.m.	Luncheon Presentation
1:00 p.m. - 5:00 p.m.	Presentations
5:00 p.m. - 6:00 p.m.	Reception

## Georgia CPE & CLE Hours:

5.0 CPE and 5.0 CLE  
There are no prerequisites for these courses.

## REGISTRATION FEE - IN PERSON ONLY:

**\$100 PER PERSON ADVANCE REGISTRATION BY 11/4/24**

**\$125 PER PERSON ON-SITE REGISTRATION**

### Register online:

<https://www.chamberlainlaw.com/news-events-atlanta-tax-seminar-2024.html>

## CHAMBERLAIN HRDLICKA HISTORY

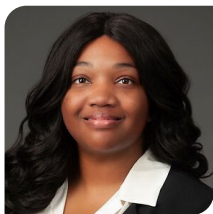
Chamberlain Hrdlicka started out as a tax boutique firm in Houston in 1965. While Chamberlain Hrdlicka has expanded with offices nationwide, the tax practice remains the core strength of the firm, with approximately half of our total lawyers practicing in one of the varied fields of tax law.

Many of our attorneys are board certified in tax law or estate planning or related areas and have worked with the IRS, the Department of Justice Tax Division, and the U.S. Tax Court. The Firm represents a wide range of large multinationals and public companies, privately held businesses, partnerships and joint ventures, individuals, estates, and tax-exempt organizations in a broad range of tax, business advisory, transactional, litigation, and collection matters.



The Chamberlain Hrdlicka Tax and Business Planning Seminars have provided valuable tax and business information in Houston for 47 years and Atlanta for 39 years. Chamberlain Hrdlicka opened its San Antonio office in 2010, and expanded its Annual Seminar to San Antonio in 2018, and to McAllen and Laredo in 2019.

# PRESENTERS



**JERRIKA C. ANDERSON**

University of Alabama School of Law (L.L.M. in Taxation);  
University of Alabama School of Law (J.D.); University of Alabama  
(B.S. in Accounting with a minor in Political Science)



**DAVID D. AUGHTRY**

The Citadel (B.A., English, 1975); University of South Carolina (J.D.,  
M. Acctcy., 1978); Emory University (LL.M. Taxation, 1982)



**EMILY A. DABNEY**

Emory University School of Law (J.D., 2021, Dean's List, Emory  
Moot Court Society ); Parsons School of Design (BAF Photography,  
2017, *cum laude*); Eugene Lang College (B.A. Politics, 2017, *cum  
laude*)



**VICTOR M. FOX**

Vanderbilt University (B.S.); University of Florida Levin College of  
Law (J.D., *cum laude*); University of Florida Levin College of Law  
(Certificate in Intellectual Property); University of Florida Levin  
College of Law (LL.M. in Taxation)



**SAMUEL H. GRIER**

Mercer University (B.A. English Literature, *cum laude*, 2008);  
Georgia State University College of Law (J.D., 2011); J. Mack  
Robinson College of Business, School of Accountancy (Master of  
Taxation, 2011); University of Houston Law Center (LL.M. in Tax  
Law, 2012)



**STEPHEN C. HEYMANN**

University of Miami (B.A., Psychology, 2009, *cum laude*);  
University of Miami School of Law (J.D., 2012, *cum laude*);  
University of Miami School of Law (LL.M. in Estate Planning,  
2013); University of Miami (Psychology, Public Policy & Law  
Journal)



**J. SCOT KIRKPATRICK**

Emory University (B.A., 1979); Wake Forest University (J.D.,  
1982); New York University (LL.M., Taxation, 1984)



**PATRICK J. McCANN, JR.**

Wake Forest University (B.A., 2005); University of Virginia School  
of Law (J.D., 2009, Virginia Tax Review - Senior Editor);  
University of Florida Levin College of Law (LL.M. in Taxation,  
2012)



**HUNTER W. RAGSDALE**

University of Alabama (LLM in Taxation, 2023); University of  
Alabama (MBA, 2023); University of Alabama, (J.D., 2023);  
University of Alabama (B.S., Finance, Real Estate specialization,  
2019)



**STEVEN M. WYATT**

University of Alabama (B.S. in Accounting, 1992); University of  
Alabama School of Law (J.D., 1996, Alabama Law Review -  
Editor); New York University School of Law (LL.M. in Taxation,  
1997)

# PRESENTATIONS

**12:00 P.M. – 12:50 P.M.**

## **Keynote and Lunch**

### **Lightning Bolts From Above: Critical Decisions Striking the Tax World From the Supreme and Lesser Courts**

Recent Supreme Court, appellate, and Tax Court decisions cast doubt over IRS regulation and rule making powers in a way that every tax advisor needs to understand. The conservation, captive, and now ERC wars impact all of us, as does notable developments.

**Presenter: David D. Aughtry**

**1:00 P.M. – 1:50 P.M.**

### **Pre-liquidity Planning: Possibilities, Pitfalls & More**

With 2026 on the horizon, and a less than certain election beforehand, many have delayed complex income tax planning and estate planning in hopes of gaining increased certainty. However, clients must be prepared when opportunity comes knocking. No matter the goal, whether it be ensuring the most income tax efficient result or maximizing charitable intent, sooner often makes for better. We'll discuss key income tax planning tools (and related pitfalls) you can use to position your clients in advance of selling a business.

**Presenters: Steven M. Wyatt & Emily A. Dabney**

**2:00 P.M. – 2:50 P.M.**

### **Help! My Client Invested in Conservation Easements: A CPA's Survival Guide**

Get the practical guidance you need to confidently advise clients with conservation easement investments. This comprehensive session equips CPAs with essential strategies for navigating federal and state tax challenges, current settlement initiatives, and parallel investigations. You'll gain actionable insights on risk assessment, compliance requirements, and proven approaches to address your clients' most pressing concerns. Whether your clients are facing potential audits or seeking preventive guidance, you'll leave with the tools to provide informed, strategic counsel in this complex and rapidly evolving area of tax law.

**Presenters: Samuel H. Grier & Jerrika C. Anderson**

**3:00 P.M. – 3:50 P.M.**

### **Don't Ruin Christmas ... Protect The Family Business!**

Under current law, significant and radical law changes are set to take effect at the end of December in 2025. These impending law changes create a precarious situation for business owners who have yet to implement a comprehensive contingency, business succession, or wealth transfer plan for their business. Oftentimes, a closely-held business is a family's most prized and valuable asset. Yet planning for the future of the business is often avoided until it is simply too late. This presentation will focus on what every business owner needs to consider when planning for the future from an estate tax perspective. The presentation will explore several case studies which demonstrate the value of estate tax planning for the business owner and highlight the risks of a failure to plan. This presentation will equip every business owner with what they need to know to have many joyous holidays to come for themselves, their family, and their employees.

**Presenters: J. Scot Kirkpatrick, Stephen C. Heymann & Hunter W. Ragsdale**

**4:00 P.M. – 4:50 P.M.**

### **No Good Deed Goes Unpunished – How the IRS is Increasing Enforcement on Gifts and Charitable Donation Transactions**

The IRS has increasingly been auditing and asserting hyper-technical arguments in both the gift and charitable donation contexts. These arguments range from valuation disputes, to assignment of income arguments, to finer substantiation requirements. During this presentation, we will discuss common IRS arguments for these transactions, potential explanations for the IRS's shift in gifts and charitable donation enforcement, and best methods for protecting clients against IRS enforcement in these areas.

**Presenters: Patrick J. McCann, Jr. & Victor M. Fox**

**5:00 P.M. - 6:00 P.M.**

### **Reception**

# REGISTRATION FORM

## CHAMBERLAIN HRDLICKA ATLANTA'S 39th ANNUAL TAX & BUSINESS PLANNING SEMINAR

Tuesday, November 12, 2024

Registration may be completed online at:

<https://www.chamberlainlaw.com/news-events-atlanta-tax-seminar-2024.html>

Alternatively, you may fill out the form below and mail it along with a check/money order payable to:

Chamberlain Hrdlicka  
Attn: Meg Grossman  
1200 Smith Street  
Suite 1400  
Houston, TX 77002

**REGISTRATION FEE - IN PERSON ONLY:**

**\$100 PER PERSON ADVANCE REGISTRATION BY 11/4/24**

**\$125 PER PERSON ON-SITE REGISTRATION**

Full Name \_\_\_\_\_ Firm \_\_\_\_\_

Title \_\_\_\_\_  CPA  Attorney  CFP

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone \_\_\_\_\_ Fax \_\_\_\_\_ Email \_\_\_\_\_

VISA  MC  AMEX  DISCOVER Card Number \_\_\_\_\_

Exp. Date \_\_\_\_\_ Signature \_\_\_\_\_

If you have any questions, please contact Meg Grossman at 713.356.1230 or [tax.registration@chamberlainlaw.com](mailto:tax.registration@chamberlainlaw.com).

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**YES**, please add me to the email  
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Tax Events information.

