

Program

THURSDAY MAY 15, 2008

7:45 am – 8:20 am
Registration

8:20 am – 8:30 am
Introduction and overview

8:30 am – 9:40 am
Income Tax Considerations in Family Breakups & Combinations
Lynn Z. Gold-Bikin, Esq., Wolf Block Schorr & Solis-Cohen LLP, Norristown, PA

Ms. Gold-Bikin will discuss the important tax considerations involved in counseling clients contemplating the split up of a family or combining different families. Alimony, property settlements and child support, QDROs, the impact on the exclusion on gain on the sale of principal residences will be among the topics discussed.

9:40 am – 10:45 am
Personal Goodwill
Alson R. Martin, Esq., Lathrop & Gage, L.C., Overland Park, KS

Personal goodwill as an asset separate from the assets of a going concern is a developing area of law with increasing scrutiny by the Internal Revenue Service. Mr. Martin will explore all of the important considerations.

10:45 am – 10:55 am
Break

10:55am – Noon
The Coming Retirement Crisis
Bruce J. Temkin, M.S.P.A., Brentwood, TN

Mr. Temkin is a nationally known speaker and the author of several best selling books in the retirement plan and planning areas. This speech will preview his newest book exposing the shortcomings of the private pension system and how government policy needs to change to address the needs of the baby boom generation.

Noon – 1:00 pm
Lunch

1:00 pm – 2:05 pm
Mergers and Acquisitions Involving S Corporations
C. Wells Hall, III, Esq., Mayer Brown Rowe & Maw, Charlotte, NC

Despite the IRS' flexibility in allowing taxpayers to cure defective S elections, there are many pitfalls involved in the sale and acquisition of S corporations when the S election needs to be maintained or where it is critical that the S election of the acquired company was at all times valid. Mr. Hall will discuss what you need to look for and how to fix that which needs fixing.

2:05 pm – 3:10 pm
Tax Considerations in the Redemption of a Partner
Bruce J. Belman, JD, CPA, Crowe Chizek and Company, LLC, Louisville, KY

Mr. Belman will present a complete primer on the workings of IRC Section 736 and related provisions including planning considerations for the redeemed partner and the partnership or LLC doing the redemption.

3:10 pm – 3:20 pm
Break

3:20 pm – 4:30 pm
Domestic & International Asset Protection Planning
J. Richard Duke, Esq., Duke Law Firm, P.C., Birmingham, AL

Many clients are concerned as much with protecting their assets as with estate and tax planning. Mr. Duke will discuss how individuals of wealth protect their assets from the unscrupulous. He will discuss both domestic and international asset protection including the use of trusts, limited liability partnerships as holding companies, tiered entities and offshore life insurance.

FRIDAY, MAY 16, 2008

8:30 am – 9:40 am
Using State Law Limited Liability Companies As S Corporations
Ronald A. Levitt, Sirote & Permutt, PC, Birmingham, AL

As a result of the flexibility provided by the check-the-box regulations and the trend in state laws to allow for the easy conversion of one type of state law entity to another, closely held business owners and their counsel now have a greater ability to mix and match the best tax status with the best state law status available. This presentation will illustrate important state law and tax law issues which tax practitioners should consider in determining what type of state law entity fits best and what to expect when converting from one to another.

9:40 am – 10:45 am
Real Estate Dealer v. Investor: Maximizing Capital Gain
Ronald A. Levitt, Sirote & Permutt, PC, Birmingham, AL

This presentation will focus upon the different techniques taxpayers use to avoid classification as a real estate dealer, thereby maximizing the opportunity for capital gain treatment. Among the topics to be discussed include sales to related development companies and condominium conversion transactions.

10:45 am – 10:55 am
Break

10:55 am – Noon
Using Joint Trusts in Estate Planning in Common Law States
Christopher Bray, Esq., Perry, Kearns, Karnatz & Bray LLC, Naples, FL

Sophisticated estate planning for married couples in common law states has typically involved separate revocable trusts for each spouse. However, recent developments have caused many planners to rethink this strategy and consider joint trusts even for their wealthier clients. Mr. Bray will discuss the pros and cons.

Noon – 1:00 pm
Lunch

1:00 pm – 2:05 pm
Estate Planning Involving Charitable Trusts
Bradley J. Schlang, CFP, Cedar Brook Financial Partners, Mayfield Hts., OH
Charitable lead and annuity trusts, both testamentary and inter vivos, have become an integral part of estate planning for the wealthy, especially in light of the fact that estate tax repeal is highly unlikely. Mr. Schlang will take us through the planning and pitfalls of their use.

2:05 pm – 3:10 pm
Estate and Income Tax Planning with Grantor Trusts
Louis B. Geneva, Esq., Meyers Roman Friedberg and Lewis, Woodmere, OH

Grantor trusts have become integral in the estate and succession planning of high net worth individuals and family business owners. Mr. Geneva will discuss the tax efficient transfer of assets to younger generations using grantor trusts.

3:10 pm – 3:20 pm
Break

3:20 pm – 4:30 pm
Estate Planning for the Entrepreneurial Client
Herbert L. Braverman, Esq., Walter & Haverfield LLP, Cleveland, OH

Owner operators of closely held and family businesses have transfer tax considerations that differ in many respects from the typical high net worth individuals. Mr. Braverman will discuss planning for the special considerations that entrepreneurs face in their planning.

National Speakers

Bruce J. Belman, CPA, JD
Crowe Chizek and Company LLC, Louisville, KY
Bruce Belman is a partner in the regional CPA firm. His main area of practice is the taxation of partners and partnerships, having contributed to the *Real Estate Accounting and Reporting Manual* published by Warren Gorham and Lamont as well as the *Tax Adviser* and various other journal articles and technical publications. Mr. Belman speaks regularly around the country on tax issues and at in-house seminars. He holds a J.D. degree from Case Western Reserve University School of Law and a B.A. degree in political science from Miami University of Ohio.

Herbert L. Braverman, Esq.
Walter & Haverfield LLP, Cleveland, OH
Mr. Braverman is a partner in the Tax and Wealth Management Section of this mid-sized law firm. He specializes in estate and wealth planning for high net worth individuals, family law and planning for special needs clients and their families. He is a fellow of the American College of Trusts and Estates Counsel and an Ohio Super Lawyer every year since it's inception.

Christopher J. Bray, CPA, JD
Perry, Kearns, Karnatz & Bray LLC, Naples, FL
Chris is a partner in the law firm, specializing in Estate and Wealth Planning for high net worth individuals. He is a noted national speaker having spoken at such seminars as the AICPA Advanced Estate Planning Conference, the Ohio Society of CPAs Annual Estate Planning Conference and the Estate Planning Councils of several cities in Ohio, Florida and Michigan. His publications include articles in *Trusts and Estates, Tax Notes, Tax Management's Estates Gifts and Trusts Journal, CCH's Taxes – the Tax Magazine, the Tax Adviser* and several Warren Gorham & Lamont publications. Chris was formerly Senior VP and Market Executive for the Southwest Florida region of National City Private Client Group and formerly Managing Director for Sterling, a National City Company. Prior to that he served as the Director of the Estate and Succession Planning Services Group of Deloitte & Touche LLP in Northeast Ohio.

J. Richard Duke, Esq.
Duke Law Firm, P.C., Birmingham, AL
Mr. Duke is a noted attorney whose main practice area is international and domestic asset protection planning for wealthy individuals. He was named to the Worth 100 list of the top attorneys in the country advising wealthy individuals for 2005, 2006 and 2007. He received his JD from Samford University and his LL.M. in Taxation from the University of Miami. He is a current or former adjunct professor of law at the graduate law program of Thomas Jefferson School of Law, the LL.M. in International Taxation program at the St. Thomas University School of Law, the Aristotle School of Law in Carlsbad, California, and the Samford University School of Law. He is a member and distinguished fellow of the Royal Society of Fellows; member International Tax Planning Association; Society of Trust and Estate Practitioners; and several national, international and state of Alabama bar associations and special sections of such bar associations. Author: Chapters, Tax Compliance and Reporting For Offshore Trusts and Uses of Foreign Life Insurance in International Estate Planning, ASSET PROTECTION STRATEGIES: PLANNING WITH DOMESTIC AND OFFSHORE ENTITIES (The American Bar Association); Use of Trusts by U. S. Citizens in International Tax Planning, TRUSTS IN PRIME JURISDICTIONS, Kluwer Law International; and co-author of CONTROLLED FOREIGN CORPORATION GUIDE; and co-author LEGAL WAYS TO SAVE TAXES, OFFSHORE TAX STRATEGIES, and OFFSHORE TAX BOOT CAMP MANUAL, Second Edition, Research Press, Inc. (Prairie Village, Kansas).

Ronald A. Levitt, Esq.
Sirote Permutt, PC, Birmingham, AL
Mr. Levitt is a business and tax planning attorney representing clients in business planning, mergers and acquisitions, federal and state tax planning, tax controversies, estate planning and tax issues related to physician practices and health care. He is a graduate of the University of Alabama *cum laude*, and received his MBA and JD from that same university. He received his LLM in Taxation from the University of Florida. He is listed in the *Best Lawyers in America*, is a fellow of the American College of Tax Counsel, has been an adjunct professor of tax law at two law schools and is a frequent speaker at national seminars.

Alson R. Martin, Esq.
Lathrop & Gage, L.C., Overland Park, KS
Mr. Martin is a recognized national authority in the fields of business law, taxation, health care, and retirement plans. He serves as general counsel for over 300 privately owned businesses. Mr. Martin has represented numerous purchasers and sellers of businesses in negotiating, structuring and closing numerous transactions, including management investors involved in taking companies private; the sale of stock, assets, mergers, acquisitions, spin-offs and split-ups and; multiple joint ventures, creation and representation of ambulatory surgery centers, specialty hospitals, and other health care entities. Mr. Martin works extensively with over 400 retirement plans, including plan

Louis B. Geneva, Esq.
Of Counsel, Meyers Roman Friedberg & Lewis, Cleveland, OH
Mr. Geneva has over 30 years experience as a tax consultant to a wide variety of clients. Having been awarded

Emeritus status at Cleveland-Marshall College of Law where he has taught federal tax courses for the past 29 years, Mr. Geneva focuses his practice on tax law with an emphasis on Estate Planning and Probate Law. He graduated from Suffolk University College of Law in 1973 and the NYU Graduate Tax Program with a LLM (Tax) in 1974. He is a Fellow of the American College of Trust and Estate Counsel and has litigated tax cases before the Tax Court, the Northern Ohio Federal District Court and the Sixth Circuit Court of Appeals.

Lynn Z. Gold-Bikin, Esq.
Wolf Block Schorr & Solis-Cohen LLP, Norristown, PA
Ms. Gold-Bikin is a Partner and Chair of the Family Law Department of this multi-office law firm. She has been named by Worth Magazine as one of the country's 100 Top Attorneys advising wealthy individuals. Her numerous publications include articles in the Villanova Law Review, the Pennsylvania Law Journal, the American Journal of Family Law and The Family Advocate. She has contributed to or written chapters in the Divorce Trial Manual, the Divorce Practice Handbook and Family Law and Practice. She is an instructor for the Pennsylvania Bar Institute, the University of Houston Trial Advocacy Institute, Villanova Law School and she previously taught at Dickinson Law School and Temple Law School. She is active in the ABA in many capacities and with the Family Law Section as well as the Family Law Section of the Pennsylvania Bar Association.

C. Wells Hall III, Esq.
Mayer Brown LLP, Charlotte, NC
Wells Hall advises clients on tax aspects of acquisitions, reorganizations, restructuring of business entities, and private equity transactions, including the use of pass-through entities (S corporations, limited liability companies, partnerships and real estate investment trusts). Wells also advises closely-held businesses on strategies for management succession, wealth transfer, asset protection, and minimizing estate, gift and generation-skipping transfer taxes. He has significant experience and expertise in the tax aspects of real estate transactions and on executive compensation plans, equity-based compensation arrangements, ESOPs and qualified employee benefit plans. He has been named among The Best Lawyers in America in Tax Law, Trusts and Estates (Woodward/White, Inc. 2008), the North Carolina Super Lawyers (Key Professional Media, Inc. 2008), and the North Carolina Business Journal Legal Elite (2008).

Ronald A. Levitt, Esq.
Sirote Permutt, PC, Birmingham, AL
Mr. Levitt is a business and tax planning attorney representing clients in business planning, mergers and acquisitions, federal and state tax planning, tax controversies, estate planning and tax issues related to physician practices and health care. He is a graduate of the University of Alabama *cum laude*, and received his MBA and JD from that same university. He received his LLM in Taxation from the University of Florida. He is listed in the *Best Lawyers in America*, is a fellow of the American College of Tax Counsel, has been an adjunct professor of tax law at two law schools and is a frequent speaker at national seminars.

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Mr. Martin is a recognized national authority in the fields of business law, taxation, health care, and retirement plans. He serves as general counsel for over 300 privately owned businesses. Mr. Martin has represented numerous purchasers and sellers of businesses in negotiating, structuring and closing numerous transactions, including management investors involved in taking companies private; the sale of stock, assets, mergers, acquisitions, spin-offs and split-ups and; multiple joint ventures, creation and representation of ambulatory surgery centers, specialty hospitals, and other health care entities. Mr. Martin works extensively with over 400 retirement plans, including plan

design, legal compliance and drafting of all types of retirement plan documents. Mr. Martin has been for many years Co-Chair and speaker at the Annual Advanced Course of Study *Professional Service Organizations*, a faculty member for the ALI-ABA Courses *Estate Planning for the Family Business Owner* and *Sophisticated Estate Planning Techniques* as well as speaker at the national meeting of the American Bar Association Tax Section, the ESOP Association Annual Convention, Mountain States Pension Conference, Southern Federal Tax Conference, Notre Dame Estate Planning Symposium and the Ohio Pension Conference, as well as the Alabama, Georgia Federal, Kansas, Missouri and Tennessee Tax conferences. Mr. Martin is President and a director of the Small Business Council of America, a national tax and employee benefits lobbying group. He also has testified in Congress regarding federal tax legislation. He was a delegate to the 1995 White House Conference on Small Business and 2006 Savers' Summit, Washington, D.C. Additionally, Mr. Martin is author of the book Limited Liability Companies and Partnerships (1996) and co-author of the book Kansas Corporation Law & Practice (Including Tax Aspects) 3d ed, (1992). He is also Technical Editor of The 401(k) Advisor (since 1995).

Bradley J. Schlang, CFP
Cedar Brook Financial Partners, Mayfield Hts., OH
Bradley J. Schlang is a native Clevelander, returning to Shaker Heights after receiving a B.A. in Economics and Mathematics from Colby College in 1989. Mr. Schlang earned an M.B.A. from Case Western Reserve University's Weatherhead School of Management in 1992 with a concentration in Marketing. He earned his Certified Financial Planner designation in 1999. Mr. Schlang is a Founding Partner of Cedar Brook Financial Partners, LLC. The firm provides financial and estate planning in addition to its insurance and investment services. Mr. Schlang specializes in estate planning, charitable planning and advanced insurance strategies. Prior to forming Cedar Brook Financial, Mr. Schlang was a Partner at Eton Financial Services and was employed by Ameritrust, Society Bank and KeyCorp. He started at the Banks as an operations analyst and progressed through the Product Management and Cash Management Sales Divisions. Mr. Schlang serves as the Treasurer of Bellefaire JCB, and is active in several other local charities. He chairs the Professional Advisory Council of the Jewish Community Federation, and serves on the councils of Case Western Reserve University, Hathaway Brown and the Cleveland Museum of Art. He is a member of the Estate Planning Council of Cleveland and Leave a Legacy.

Bruce J. Temkin, M.S.P.A
Brentwood, TN
Bruce J. Temkin is an Enrolled Actuary. He is a nationally recognized authority on qualified plans, their distributions and retirement decision-making. He has authored, taught and published numerous advanced continuing education programs on these subjects. Recent programs include national conferences sponsored by the American Law Institute, American Institute of Certified Public Accountants, American College of Trust and Estate Council and the American Society of Actuaries. He also frequently addresses tax institutes such as The Notre Dame Tax Institute, Southern Federal Tax Institute, Kansas Tax Institute and the USC Tax Institute, on a variety of employee benefit topics. He has the distinction of both developing and chairing the American Law Institute-American Bar Association's national program on financial decision-making for lawyers and their clients. He is a frequently quoted resource to various news and financial publications, such as Newsweek, Forbes, Fortune, The Wall Street Journal, New York Times and Nation's Business, on a variety of employee benefit, tax, and retirement issues. Recent works include "Maximizing Benefits from IRAs and Qualified Plans" and the critically acclaimed book, The Terrible Truth About Investing.

CMLAA-CLE PRESENTS FOURTH ANNUAL GREAT LAKES FEDERAL TAX INSTITUTE CLEVELAND, OHIO May 15-16, 2008

- Great Lakes Federal Tax Institute program approved for 12 CLE credits
- CEU and CPE credits have been applied for
- Program presented at the Cleveland-Marshall College of Law 1801 Euclid Ave., Cleveland, OH
- Registration begins at 8:00 a.m.
- Coffee and doughnuts available from 7:45 a.m.
- Attendance required for CLE credit
- Printed materials distributed at program
- Printed materials available for purchase
- CMLAA-CLE submits credit hours to Supreme Court
- CMLAA MEMBERS RECEIVE A SPECIAL \$50 PROGRAM DISCOUNT ON ADVANCE REGISTRATION

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Cleveland-Marshall Law Alumni Association

For more information contact:
Mary McKenna, Coordinator
(216) 687-2368
mary.mckenna@law.csuohio.edu
Fax (216) 687-6881
Professor Kevin O'Neill, Director
(216) 687-5282
kevin.oneill@law.csuohio.edu

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CMLAA-CLE PRESENTS
**FOURTH ANNUAL
GREAT LAKES
FEDERAL TAX
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CLEVELAND, OHIO
May 15-16, 2008



REGISTRATION

TUITION: Registration paid 7 days in advance: \$499; Registration paid less than 7 days in advance: \$549. CMLAA members may deduct \$50.

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A block of rooms has been reserved at the Wyndham Hotel on Playhouse Square, two blocks west of the law school, for those wishing to stay near the conference. When reserving a room, ask for the Great Lakes Federal Tax Institute room rate, which is \$109 per night. The hotel will hold this block only through May 10, 2008. For reservations please call 216-615-7500.

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National Speakers

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