



Tennessee and Federal Tax Law Forum 2016
Tennessee Bar Center – Nashville, TN
September 12, 2016

Program Description: This year's annual tax program will provide you with the best practices and updates to protect your clients by focusing on significant developments in both federal and state tax laws. Sessions will include updates on the repeal of the Hall Income Tax, Section 1031 exchanges and an update on the Tennessee Tax Regulation Project. Presenters will also discuss the variability of sales and use tax in the emerging technological realm and the new proposed regulations under § 385 and their impact on corporate inversions. A final session will provide you with detailed information on the changes to the regulations governing Partnership Tax audits by the IRS and why you may need to amend all partnership and LLC operating agreements by 2018.

Agenda

8:30-9:00am	Registration
9:00-10:00am	Sales Tax on Cloud-Based Business, SaaS & Technology <i>Christine Lapps, Ernst & Young LLP</i> <i>Bruce Shanks Jr., Ernst & Young LLP</i>
10:00-10:15am	Break
10:15-10:45am	Rulemaking Update <i>Kristin Husat, Tennessee Department of Revenue</i> <i>Lauren Fields, Tennessee Department of Revenue</i>
10:45-11:15am	Legislative Update: Hall Income Tax Repeal <i>Richard H. Roberts, Commissioner, Tennessee Department of Revenue</i> <i>David Gerregano, Tennessee Department of Revenue</i>
11:15-12:00pm	Lunch
12:00-1:00pm	Repeal of TEFRA IRS Audits, Partnership Tax Liability and the Need to Amend all Partnership and LLC Operating Agreements by 2018 <i>J. Leigh Griffith, Waller Lansden Dortch & Davis, LLP</i>
1:00-2:00pm	IRC § 1031 Update & Advanced Issues <i>Claudia Kiernan, Investment Property Exchange Services, Inc.</i>

- 2:00-3:00pm **Estate Planning with Trusts in Tennessee**
Branch Howard, Howard Mobley Hayes & Gontarek, PLLC
Bryan Howard, Howard Mobley Hayes & Gontarek, PLLC
- 3:00-3:15pm **Break**
- 3:15-4:15pm **Inversions and the Proposed Section 385 Regulations**
Matthew White, KPMG LLP
- 4:15-4:45pm **TBA Special Committee on the Evolving Legal Market Report
(Optional)**
Jason Long, TBA President, Lowe, Yeager & Brown