



SUMMER INSTITUTE IN TAXATION

Introduction to State and Local Taxation

July 16-18, 2012

Co-Chairs: Arthur R. Rosen, Esq., *partner, McDermott Will & Emery LLP, New York, NY* &
Leah Robinson, Esq., *partner, McDermott Will & Emery LLP, New York, NY*

State and Local Taxation II

July 19-20, 2012

Co-Chairs: Arthur R. Rosen, Esq., *partner, McDermott Will & Emery LLP, New York, NY* &
Leah Robinson, Esq., *partner, McDermott Will & Emery LLP, New York, NY*

Introduction to Partnerships

July 16-18, 2012

Chair: James A. Gouwar, Esq., *partner, Bingham McCutchen LLP, New York, NY*

Introduction to Consolidated Returns

July 18-20, 2012

Chair: Stephen A. Sacks, CPA, J.D., LL.M., *executive director, Ernst & Young LLP, New York, NY*

Introduction to International Taxation

July 23-25, 2012

Chair: William B. Sherman, Esq., *partner, Holland & Knight LLP, Fort Lauderdale, FL*

Advanced International Taxation

July 26-27, 2012

Chair: William B. Sherman, Esq., *partner, Holland & Knight LLP, Fort Lauderdale, FL*

Introduction to Trusts and Estates

July 23-25, 2012

Chair: Joseph P. Scorese, Esq., *partner, Harwood Lloyd, LLC, Hackensack, NJ*

Wealth Planning for High Net-Worth Individuals and Owners of Closely-Held Companies

July 25-27, 2012

Chair: Jerald David August, Esq., *partner, Fox Rothschild LLP, Philadelphia, PA & West Palm Beach, FL*

8.30-8.45 a.m.

"RE-GROUP AND REDUX"

Joseph P. Scorese, Esq., partner, Harwood Lloyd, LLC, Hackensack, NJ
LIFETIME TRANSFERS AND THE FEDERAL GIFT TAX:
THE ENDURING WEALTH TAX

8.45-10.30 a.m.

The tax on a client's lifetime gifts is an important complement to the estate tax and essential knowledge for anyone advising on estate and trust matters. But what is a gift? This presentation explores the nature of gifts through the eyes of the Internal Revenue Code. Essential concepts are covered such as the elements of a completed gift, allow deductions, the annual exclusion and other exclusions. Also covered in this presentation are the fundamental planning usages of disclaimer and *Crummey* trusts. In addition, the presentation covers foundational concepts such as gift splitting, calculation of tax, filing gift tax return and procedures, the impact of the Tax Relief Act of 2010, and the future of the gift tax.

Catherine G. Schmidt, Esq., partner, Patterson Belknap Webb & Tyler LLP, New York, NY

Refreshment Break

10.30-10.45 a.m.

10.45 a.m.-

12.15 p.m.

**MULTI-GENERATIONAL PLANNING AND
THE GENERATION-SKIPPING TRANSFER TAX**

The third of the three wealth taxes, the GST tax is largely a "planning tax." Basic concepts and mechanics of the tax are explored (i.e., the characterization of a generation skip, the allocation of GST exemption, inclusion ratio and the applicable rate), as well how these mechanics affect estate planning for high-net worth individuals in vehicles such as dynasty trusts and insurance trusts. The future of the GST tax in light of the Tax Relief Act of 2010 is explored as well.

Joseph P. Scorese, Esq., partner, Harwood Lloyd, LLC, Hackensack, NJ
Lunch Recess

12.15-1.30 p.m.

1.30-3 p.m.

**TAX COUNSEL: REPRESENTING THE FAMILY IN
TRANSITION**

This presentation offers glimpses of best practices in providing tax counsel in the context of the administration of an estate. Pulling together the concepts learned in prior sessions, this presentation looks at the preparation and filing of estate tax returns, procedure and administration, extensions, payment of tax, managing client expectations and experiences during tax audits and post-audit controversies. The speakers also conduct a mock estate tax audit.

Dean L. Surkin, Esq., principal, Rosen Seymour Shaps Martin & Co., New York, NY

James J. Curry, Jr., Esq., James J. Curry, Jr., LL.M., Toms River, NJ

Refreshment Break

3-3.15 p.m.