OLI *We raise the Bar*

Oregon Law Institute of Lewis & Clark Law School

Friday December 18, 2009

12:00 noon – 2:00 p.m.

Standard Insurance Building Auditorium
900 SW Fifth Avenue
Portland, Oregon

2 MCLE Credits

"The topics covered were excellent and the structure was informative and easy to follow"

"Mr. Bogdanski's presentation skills and approach hold an audience easily and make CLE a fun experience"

"This was a great class and I plan to attend next year and bring some coworkers"

Space is limited; register today! First come, first served.

Registration form with payment must be received by Monday, December 14 before 5:00 p.m., or an additional fee will apply.

If you need to cancel, you may request the handout, or substitutions are gladly accepted. Refunds will not be issued. If you are a person with a disability, please let OLI know in time to make any necessary accommodations for you.

Questions? Please call OLI at (503) 768-6580 or (800) 222-8213 or e-mail us at oli@lclark.edu.

3rd Annual

Recent Developments in Federal Tax Valuation

featuring Jack Bogdanski

Jack Bogdanski will discuss the more notable events of the past year (and then some) in the fast-moving world of valuation of property for federal tax purposes. Topics will include areas of interest to income tax practitioners and estate and gift tax practitioners alike, among them:

- the latest caselaw (some favorable to taxpayers, some not) on discounts for family limited partnerships, under the estate tax, the gift tax, and even the income tax;
- application of the "check-the-box" regulations to single-member LLCs for federal tax valuation purposes;
- the new IRS actuarial tables governing valuation of successive interests, such as life estates and remainders;
- new judicial pronouncements about conservation and historic preservation easements, including discussion of the "highest and best use" of real estate subject to contractual restrictions;
- proposed regulations on valuation of partnership interests transferred in debt-for-equity exchanges;
- a Ninth Circuit decision on discounts for undivided interests in works of art;
- a First Circuit decision on allocation of the purchase price of a business between personal goodwill and a covenant not to compete;
- the effect of valuation difficulty on the tax consequences of demutualization of insurance companies;
- final regulations under Section 2036 on the estate tax treatment of grantor-retained annuity trusts and unitrusts;
- a new Tax Court ruling on the doctrine of equitable recoupment in valuation cases; and
- additional late developments.

Prof. Bogdanski practiced in Portland as a partner at Stoel Rives LLP. He has taught at Lewis & Clark Law School since leaving practice in 1986. He is a five-time winner of Lewis & Clark's Leo Levenson Award for excellence in law teaching.

A former member of the Commissioner's Advisory Group of the U.S. Internal Revenue Service, Prof. Bogdanski is the author of the treatise FEDERAL TAX VALUATION and the editor-in-chief of the bimonthly journal *Valuation Strategies*. He has written many articles on federal tax law and is currently the Closely Held Business and Valuation columnist for *Estate Planning* magazine.

Name _____ OSB No. or Profession _____

Firm/Organization _____

Street Address _____

City/State/Zip _____ Phone _____

E-mail _____

Please return form and payment to:
OLI Registrar
620 SW Main St., Ste. 706
Portland, OR 97205
PH: (503) 768-6580; (800) 222-8213 • FX: (503) 768-6585

Tuition

☐ $60.00 Regular Tuition
☐ $15.00 OLI Annual Passholder (Pass No._____)
☐ $10.00 Add to above tuition if *received after Dec. 14, 2009*

Optional Box Lunch

☐ $12.00 Add to above tuition. Please choose one:
☐ Turkey ☐ Ham ☐ Vegetarian ☐ Chicken Caesar Salad

ENCLOSED IS $_____ BY:

☐ Check payable to Oregon Law Institute (OLI)

☐ Credit Card: ☐ VISA ☐ MasterCard

Acct. No. _____ Exp. Date _____

Signature: _____

Visit our website at www.lclark.edu/org/oli for information about upcoming seminars or to view our online catalog.