

THURSDAY, NOVEMBER 9

Online Webinar

9:00 - 10:00 a.m.

Subchapter S Corporation/F Reorganizations/Pass-Through Structures: An In-Depth Look at Certain Technical and Business Issues

J. Conrad Garcia, Kevin Bender

This session will take a deep dive into various corporation structures and related tax considerations and issues. The session will focus on pass-through partnership acquisition, with discussions on issues such as the impact of compliance and tax return provisions in the purchase agreement, asset step-up or 754 election, and revaluation of capital account. In addition, the session will provide an overview of issues regarding buyer's capital, including preferred capital/convertible debt, roll-over common, and additional capital and recapitalizations.

10:00 - 10:15 a.m.

Break

10:15 - 11:15 a.m.

Recent Developments in Virginia Taxation Through the Eyes of a SALT Practitioner

Craig D. Bell

This session will provide a lively discussion of Virginia tax legislation, recent court decisions, rulings of the Tax Commissioner, and opinions of the Attorney General on matters of Virginia taxation designed to keep the audience apprised of the current issues most typically being faced by taxpayers in Virginia taxation, areas of concern by state and local tax officials, and trends observed in Virginia taxation by those who heavily practice in the area.

11:15 - 11:30 a.m.

Break

11:30 a.m. - 12:30 p.m.

Who Is Writing More Tax Law? Congress or Treasury?

Russell W. Sullivan

Congress is developing tax legislation to consider before 2023 closes. This presentation will reveal its contents and what it takes to get it signed into law. Meanwhile, Treasury is promulgating proposed regulations and guidance implementing the Inflation Reduction Act, especially the greener energy tax incentives. Which laws will have more impact? And how will the 2024 elections change the contours of tax legislation that must pass.

FRIDAY, NOVEMBER 10

Online Webinar

9:00 - 10:00 a.m.

Recent Developments in Wealth Planning

Christine Nguyen Piersall, Jefferson C. Hunt

This presentation will explore recent cases, revenue procedures, private letter rulings, proposed regulations and regulations that affect estate and gift tax planning.

10:00 - 10:15 a.m.

Break

10:15 - 11:15 a.m.

Tax Administration After the Inflation Reduction Act of 2022

Nina E. Olson

The Inflation Reduction Act (IRA) made significant investments in the Internal Revenue Service. This presentation will examine how the IRA has (and will) affect tax administration and enforcement.

11:15 - 11:30 a.m.

Break

11:30 a.m. - 12:30 p.m.

Opportunities Abound! Energy Tax Credits and the Inflation Reduction Act of 2022

Laura Ellen Jones, Jaime Park

The extension, expansion and modification of the energy tax credit provisions enacted by the Inflation Reduction Act (IRA) are game-changing for the country's energy transition from fossil fuel power generation to renewable and other clean, carbon-neutral energy technologies. This session will provide an overview of the IRA's energy tax credit provisions and a discussion of the new ways that companies and other taxpayers can take advantage of the opportunities in the IRA. For example, did you know that certain energy tax credits can now be sold to a third party for cash? Join us for a discussion of this new financing structure and yet more surprises contained in the IRA.