



HOLLAND & HART 2020 TAX CONFERENCE

Agenda & Speaker Information December 16, 2020

CPE and CLE Information

3.0 CPE credits recommended in Taxes. 0.6 Ethics credits and 4.0 CLE credits for the State of Colorado.

9:00 – 9:30 AM | Update on Qualified Opportunity Zones

This session will discuss highlights from the final regulations on opportunity zones and COVID related guidance.

Learning Objectives

After completing this course, the participant will be able to:

- Learn how the new rules have made investing in opportunity zones more flexible.



ADAM COHEN – Partner

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Adam provides strategic advice to clients about the tax aspects of structuring the formation, acquisition, disposition, operation, and liquidation of businesses, with a focus on fund formation. He counsels clients on renewable energy and low-income housing tax credit projects, and he is an industry-leading speaker on opportunity zones, renewable energy tax incentives, and partnerships.

9:30 – 10:00 AM | Advocacy and Communication on Virtual Platforms

This session will discuss best practices developed through many hours of virtual advocacy and communication with tax authorities. The presenters use virtual platforms on a daily basis for tax discussions, including for all-day presentations, communications with exam team members, and appeals conferences and mediations. The presenters will also demonstrate effective techniques for addressing complex issues.

Learning Objectives

After completing this course, the participant will be able to:

- Improve virtual communication and advocacy skills.
- Understand and fix common audio and video issues that impair communication.
- Learn skills to present complex information and regulatory provisions.



Sue Combs – Partner

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Susan advises and defends companies through complex and high-stakes litigation and regulatory matters involving issues of federal income tax controversy and commercial litigation. Before joining Holland & Hart, Susan served as a law clerk on the U.S. Court of Appeals for the Seventh Circuit for the Honorable Kenneth Ripple.



William Colgin – Partner

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Bill represents corporate taxpayers in complex, high-stakes federal tax controversies and tax litigation with significant implications for his clients' bottom line. Bill litigates in the US Tax Court, federal district courts, state courts, and appellate courts throughout the country.

10:00 – 10:10 AM | M&A Tax Update

This session will focus on the expanded definition of what is excluded from capital asset treatment under Section 1221(a)(3) and its implications in M&A transactions.

Learning Objectives

After completing this course, the participant will be able to:

- Summarize the expanded scope of Section 1221(a)(3).
- Recognize its potential application to various transactions.



TRENT TIMMONS – Associate

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Trent advises clients on a range of corporate, partnership, and individual income tax matters. Prior to joining Holland & Hart, Trent attended Stanford Law School where he served as co-president of the Stanford Tax Club and participated in the Tax Pro Bono Project. He also served as a law clerk in the Tax Division of the United States Attorney's Office for the Northern District of California.

10:10 – 10:30 AM | Taxation of Cryptocurrency

Cryptocurrency income, gain, and loss is an emerging area of the federal income tax law. This session will review current guidance and describe areas where taxpayers need additional guidance.

Learning Objectives

After completing this course, the participant will be able to:

- Understand current IRS guidance on cryptocurrency.
- Examine unsettled areas of the law.
- Explore IRS enforcement activities related to cryptocurrency.



DIANA MYERS – Associate

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Diana brings extensive international tax experience from her practice at Baker McKenzie in Chicago. Prior to joining Holland & Hart, she worked for the Chief Tax Strategist at Northern Trust Corporation, covering tax reform legislation for the company and its high-net worth clients.

10:30 – 10:40 AM | Break

10:40 – 11:10 AM | Biden's Tax Proposals

After a chaotic year, we will have a change in administration and concomitant change in tax policies and priorities. This session will discuss President-Elect Biden's domestic income tax proposals, both legislative and administrative, and some of the issues and opportunities they present.

Learning Objectives

After completing this course, the participant will be able to:

- Describe the domestic federal income tax objectives of President-Elect Biden.
- Explain the manner in which the new administration will effectuate its proposals.
- Evaluate the effect of the proposals.
- Understand planning opportunities before and after the adoption of the proposals.



ROBERT KEATINGE – Of Counsel

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Bob advises a wide variety of businesses and their owners, from start-up companies to publicly-traded corporations. He acts as a consulting or testifying expert on matters of business organization, federal tax, and professional responsibility, at all stages of organizational life.

11:10 – 11:35 AM | How to Navigate a Sinking Partner-Ship

This session will discuss issues to consider in connection with partnership debt workouts, including cancellation of indebtedness income, modification of debt instruments, equity for debt-exchanges and the tax treatment of foreclosures.

Learning Objectives

After completing this course, the participant will be able to:

- Recognize the tax risks and options for partnerships workouts.
- Evaluate the tax effects resulting from a foreclosure of property.
- Identify steps to consider prior to a partnership debt workout.



SARAH HARADON – Partner

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Sarah's pragmatic approach to solving complex tax issues helps both companies and individuals achieve optimal tax efficiency in their business operations. She is an essential member of the firm's corporate, merger and acquisition, fund formation, master limited partnership, and real estate deal teams.

11:35 AM – 12:00 PM | Ethics Presentation – Work Product and Confidentiality

The presentation will provide an overview of recent case law impacting the work product doctrine and the tax practitioner privilege.

Learning Objectives

After completing this course, the participant will be able to:

- Be up-to-date on current ethics developments.
- Recognize ethical pitfalls that impact tax professionals.



KAREN DEAN – Of Counsel
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As the former senior in-house tax counsel for multiple global Fortune 500 companies, Karen deeply understands the complex business challenges multinational corporations face to evaluate and solve tax matters. She represents clients in high-stakes tax controversies and litigation. Karen also advises clients on a broad range of tax issues, helping them untangle complex tax matters.

ABOUT THE FIRM

Founded in 1947, Holland & Hart is a full-service Am Law 200 firm with offices in eight states and in Washington, D.C. We deliver integrated legal solutions to regional, national, and international clients of all sizes in a diverse range of industries. For more information, visit www.hollandhart.com or on Twitter: @HollandHart.