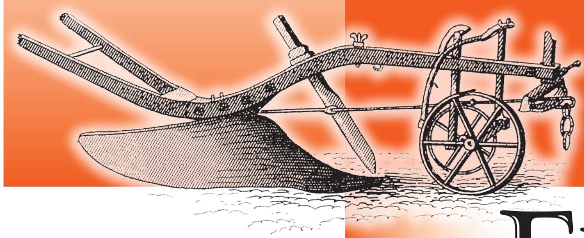


The 48th Annual Great Plains Federal Tax Institute

Celebrating 48 years of providing scholarships to students of the UNL School of Accountancy and the College of Law

Highlights for 2010

- A review of current developments in income, estate, and gift taxes
- Presentations by nationally-known speakers with practical planning information covering a variety of hot topics, including agricultural law, grantor defective trusts, tax controversy resolution, and state nexus issues
- Current developments in income and gift and estate taxation
- State tax and economic development
- Thursday afternoon breakouts on three distinct topics
- Two hours of Ethics
- Registration Fee Discounts:
  Early Registration $360 for registrations received by November 10; $410 thereafter
  $275 for participants with five or fewer years in practice

For attorneys, CPAs, financial planners, life insurance and other tax professionals

Institute Features for 2010

- **Online registration/credit cards.** The Institute is accepting online registration and payment via credit card. Go to http://www.greatplainstax.org to register. You may also use the credit card option if you prefer to mail in your registration. As always, checks are also accepted. See back panel for details.
- **Going green.** The Institute encourages participants to take advantage of the course materials offered on its website at http://www.greatplainstax.org or to use the complimentary flash drive that will be presented to you when you check in at the Institute. To access the online materials you may use the password, which will be emailed to you once you have registered for the course. It is your option to print or not to print the materials.
- **Complimentary flash drive loaded with course materials.** If you choose not to print the materials, you may bring your laptop to the Institute and there access the materials via the complimentary flash.
- **Printed materials available for an additional fee.** Institute registrants may request a printed copy of the course materials for an additional fee of $75. Persons unable to attend the Institute may obtain written materials as well as the complimentary flash drive for a fee of $225. See back panel for details
- **Continuing Education Credit.** Please see back panel for a listing of continuing education credit for CPAs, attorneys, CFPs and insurance professionals. For more details, go to http://www.greatplainstax.org and select Annual Institutes. Then choose CE Reporting.

December 2 & 3, 2010

Embassy Suites Omaha
Downtown/Old Market
555 S. 10th Street
Omaha, Nebraska

Sponsored by:
- Great Plains Federal Tax Institute, Inc.

In cooperation with
- Nebraska State Bar Association
- Nebraska Society of Certified Public Accountants
- University of Nebraska-Lincoln College of Law School of Accountancy

Comments from participants at the 2009 Great Plains Federal Tax Institute

"Great two days! I love being able to get 100% of my annual MCLE requirements fulfilled in one conference."

"I like the online materials. This is the best CLE program for tax practitioners and I will continue to attend annually."

"Ran very smoothly. Good presentations and materials."

http://www.greatplainstax.org

Great Plains FEDERAL TAX INSTITUTE

THURSDAY, DECEMBER 2, 2010

7:30 a.m. **Registration**
Coffee and rolls are served.

8:25 **Welcome and Introductory Remarks**
Recognition of Scholarship Recipients

8:30 ■ **Important Developments in Federal Income Taxation***
Professor Edward A. Morse
A review of significant case law, administrative pronouncements, and legislation in the federal income tax arena, with insights and commentary focusing on items of general interest for individuals and business taxpayers.

10:00 **Refreshment Break**

10:15 ■ **Ethical Issues in Tax Practice**
Professor Thomas J. Purcell III
An overview of Internal Revenue Code, regulatory and judicial oversight of federal and state tax practice. Emphasis on recent changes to Circular 230 and updates on Section 694 tax return preparer regulations. Practice scenarios will be discussed.

12:15 p.m. **Luncheon – included with registration**

1:15 ■ **Farm Income Tax Update**
Professor Roger A. McEowen
This session focuses on recent cases and rulings impacting agricultural taxation. It also addresses recent IRS rulings of relevance and recently enacted legislation of importance to agriculture.

2:45 **Preview – Breakout Sessions**

3:00 **Refreshment Break**

3:20 **Breakout Sessions**

■ **Valuing Closely-Held Businesses – Current Trends**
W. Reed Samson, Moderator
Matthew K. Stadler
Joshua A. Weiss
A review of current trends and techniques in valuing closely held buinesses.

■ **Anatomy of a Life Insurance Purchase***
Kurt F. Tjaden
Mark A. Weber
Learn how practicing attorneys and accountants can assist their clients to make informed decisions when evaluating the purchase of life insurance and ownership structure.

■ **Post Mortem Planning – Let Us Count the Ways**
Sharon R. Kresha
Ronald C. Jensen
A survey of post mortem planning issues to consider, including estate and income tax issues, modified carryover basis, spousal elections, disclaimers, funding and distribution decisions.

4:35 **Recess**

FRIDAY, DECEMBER 3, 2010

8:00 a.m. ■ **Current Federal Developments in Estate and Gift Taxation***
Timothy L .Moll
Presentation of the latest significant case law, legislative, and regulatory developments in the estate and gift tax area during the past year with highlights of significant planning opportunities and pitfalls.

9:30 **Refreshment Break**

9:45 ■ **Fifteen Years of Sales to IDITs – Where Are We Now?***
Michael D. Mulligan
An analysis of the sale to an Intentionally Defective Irrevocable Trust (IDIT) as an estate planning strategy – how the typical sale is structured, how it has evolved over the 15-year period since it was introduced, and how the transaction is useful in a variety of different circumstances and with a variety of different kinds of assets.

11:15 ■ **Nexus: The Concept, Practical Applications, and Recent Developments**
Craig Lawless
A basic framework for the concept of nexus, including a history of the changes in interpretation due to significant Supreme Court cases. Then that discussion of nexus theory will be translated to real-world issues and situations. Finally, recent development in nexus will be discussed, including the attempts by states to apply an economic nexus argument to various tax types and the recent developments in the so-called Amazon.com court decisions.

12:15 **Luncheon – included with registration**

1:15 p.m. ■ **The Tax Policy Road Ahead**
Jeff Kummer
A preview of tax policy for 2011 and beyond, including the pending expiration of the 2001/2003 tax cuts, status of the estate tax, as well as what tax proposals can be expected in the President's Fiscal Year 2012 budget.

2:15 **Refreshment Break**

2:30 ■ **Current Topics in Tax Controversy Resolution**
JW Wyatt
Recent Court decisions of first impression have granted judgments in favor of the taxpayer on multiple tax questions. It is likely, however, that the IRS Large and Mid-Size (LMSB) Division will continue to challenge taxpayers on these issues. The presentation will discuss recent developments and apply the court decisions to tax controversy at the LMSB examination level and the IRS Appeals Division level.

3:30 ■ **State Tax and Economic Development**
Nicholas K. Niemann
Current developments including significant case law and Legislative action regarding state taxes and incentives. Highlights of planning opportunities and areas of concern.

4:30 **Adjournment**

***These sessions are approved by the Nebraska Department of Insurance for Life credit.**

FACULTY

Ronald C. Jensen
Baird Holm LLP
Omaha, Nebraska

Sharon R. Kresha
Baird Holm LLP
Omaha, Nebraska

Jeff Kummer
Deloitte Tax, LLP
Washington, DC

Craig Lawless
RSM McGladrey, Inc.
Minneapolis, Minnesota

Professor Roger A. McEowen
Iowa State University
Ames, Iowa

Timothy L. Moll
Rembolt Ludtke LLP
Lincoln, Nebraska

Professor Edward A. Morse
Creighton University School of Law
Omaha, Nebraska

Michael D. Mulligan
Lewis, Rice & Fingersh, L.C.
St. Louis, Missouri

Nicholas K. Niemann
McGrath North Mullin & Kratz, PC LLO
Omaha, Nebraska

Professor Thomas J. Purcell III
Creighton University School of Law
Omaha, Nebraska

W. Reed Samson
Lutz & Company PC
Omaha, Nebraska

Matthew K. Stadler
Lutz & Company PC
Omaha, Nebraska

Kurt F. Tjaden
Koley Jessen, P.C., L.L.O.
Omaha, Nebraska

Mark A. Weber
SilverStone Group, Inc.
Omaha, Nebraska

Joshua A. Weiss
Lutz & Company PC
Omaha, Nebraska

JW Wyatt
KPMG LLP
St. Louis, Missouri

EXHIBITORS

SILVERSTONE GROUP

BCC ADVISERS

First National Wealth Advisors

Omaha Community Foundation
Let good grow.

NEBRASKA TITLE COMPANY
Service Beyond Expectation Since 1947

Board of Directors

Nebraska State Bar Association

Don R. Janssen
Cline, Williams, Wright, Johnson & Oldfather
Lincoln, NE

Sharon R. Kresha*
Baird Holm LLP
Omaha, NE

Timothy L. Moll*
Rembolt Ludtke LLP
Lincoln, NE

Adam D. Pavelka
Sullivan, Shoemaker, Witt & Burns, PC, LLO
Hastings, NE

Jeffrey J. Pirruccello*
McGrath North Mullin & Kratz, PC LLO
Omaha, NE

Nick R. Taylor
Fitzgerald, Schorr, Barmettler & Brennan, P.C., L.L.O.
Omaha, NE

Kurt F. Tjaden*
Koley Jessen, P.C., L.L.O.
Omaha, NE

Jeffrey D. Toberer
Stinson Morrison Hecker LLP
Omaha, NE

Mark A. Weber*
SilverStone Group, Inc.
Omaha, NE

College of Business Administration, University of Nebraska

Paul A. Shoemaker
Professor and Director
School of Accountancy

Aaron Crabtree*
Associate Professor
School of Accountancy

*Program Committee Members

Nebraska Society of Certified Public Accountants

Rod L. Anderson
KPMG LLP
Omaha, NE

Brian M. Csipkes
Seim Johnson Sestak & Quist LLP
Omaha, NE

Brent T. Friehauf
Seim Johnson Sestak & Quist LLP
Omaha, NE

Bruce L. Meister
BKD LLP
Lincoln, NE

W. Reed Samson
Lutz & Company PC
Omaha, NE

Shane Siebert
RSM McGladrey
Omaha, NE

Deyna C. Rouse
Lutz & Company PC
Omaha, NE

Richard J. Tiwald*
Deloitte Tax LLP
Omaha, NE

College of Law, University of Nebraska

William H. Lyons
Professor

Directors Emeritus

David L. Hefflinger
McGrath North Mullin & Kratz, PC LLO
Omaha, NE

Paul C. Jessen
Koley Jessen, P.C., L.L.O.
Omaha, NE

Burnell E. Steinmeyer
Kelley, Scritsmeier & Byrne, P.C.
North Platte, NE

Officers of the Great Plains Federal Tax Institute

Mark A. Weber
President
SilverStone Group, Inc.
Omaha, NE

Aaron Crabtree
Vice President
UNL School of Accountancy
Lincoln, NE

Kurt F. Tjaden
Secretary
Koley Jessen, P.C., L.L.O.
Omaha, NE

Bruce L. Meister
Treasurer
BKD LLP
Lincoln, NE

Program Location

The program will be held at the Embassy Suites Hotel Downtown/Old Market, 555 South 10th Street, Omaha, Nebraska. The hotel, which is a short five-minute drive from Omaha's Eppley Airfield and easily accessible from Interstate 480, offers a myriad of dining, shopping and entertainment options in the historic Old Market District. Several attractions are located within walking distance or a short drive, including the Holland Performing Arts Center, Joslyn Museum, the Western Heritage Museum, the world-renowned Henry Doorly Zoo, Gallup University and the University of Nebraska Medical Center campus.

Directions

- **From the North:** : I-29 to I-480 West Across the River into Omaha. Take Dodge Street Exit. At Stoplight Turn Left on 10th Street. Proceed ½ Mile – Hotel is on the Left
- **From the West:** I-80 East Through Omaha to I-480 North/Downtown. Take I-480 North to Harney Street Exit – Continue East on Harney Street to 10th Street. Turn Right on 10th Street. Hotel is on the Left
- **From the South:** I-29 North to I-480 West Across the River into Omaha. Take Dodge Street Exit. At Stoplight Turn Left on 10th Street. Proceed ½ Mile – Hotel is on the Left
- **From the East:** I-80 West to I-29 North to I-480 West Across the River into Omaha. Take Dodge Street Exit. At Stoplight Turn Left on 10th Street. Proceed ½ Mile – Hotel is on the Left

Parking

The Institute is providing validated parking in the Omaha Park Four Lot, located at the corner of 10th and Jackson. (Enter from the south side of Jackson Street.) Bring your ticket to the registration desk to have it stamped.

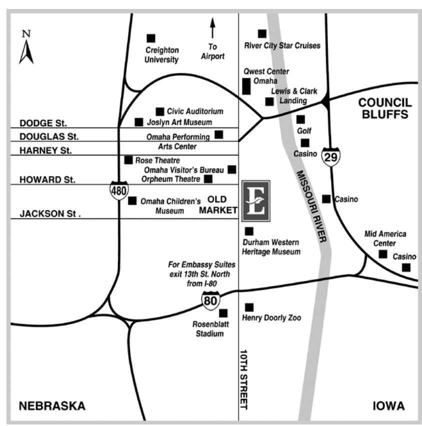
Omaha Park Four Lot – 10th & Jackson: Validated parking for Institute participants
Embassy Suites Valet – Location: 10th Street between Howard & Jackson; Rate $14 per day
City Parking Lot – Location: 10th & Jackson; Rate: $4 Event Parking
Meters – Location: 10th between Jackson & Howard; Free after 5 p.m.; 40 total
Location: 10th Street Overpass/Hill; Free after 5 p.m.; 80 total

To view a detailed map of parking areas in the Old Market, log onto http://www.oldmarket.com and click on the map link on the right side.

Hotel Accommodations

A block of suite-style rooms has been reserved at the Embassy Suites Hotel Downtown/Old Market at the rate of $119 per room, per night plus applicable taxes single/double occupancy for the nights of December 1 and 2, 2010. The hotel is pleased to offer the group rates three days prior and three days after December 1 and 2, 2010, subject to hotel availability. Reservations are available on a first come, first serve basis. The cut-off date for this special room block is November 10, 2010. All reservations after this date will be accepted on a space and rate availability basis. To make your reservations, call (800) 362-2779 or (402) 346-9000 and request the Great Plains Federal block or register online at www.embassysuitesomaha.com using the group code GPF. The block is found in the reservation system under group code: GPF and is named Great Plains Federal.

The $119 Rate includes a complimentary full cook-to-order breakfast and a complimentary nightly manager's reception 5:30 p.m. - 7:30 p.m. for all overnight guests. Self parking in the Embassy Suites lot is complimentary; the airport shuttle transportation is included in the daily rate. Each two-room suite offers the convenience of in-room refrigerators, microwave ovens, coffee makers, telephones with voice mail and high-speed Internet access. The hotel also offers an on-site fitness center, business center, full-service restaurant and wheelchair accommodations.



Things To Do in Omaha

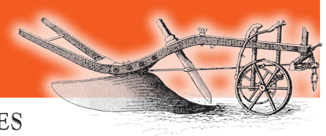
Visit these web sites for information about attractions and events going on in Omaha on the weekend of the Institute.

Omaha Convention and Visitors Bureau
http://www.visitomaha.com

The Old Market
http://www.oldmarket.com

Omaha Performing Arts Society
http://www.omahaperformingarts.org

48TH ANNUAL *Great Plains* FEDERAL TAX INSTITUTE



DECEMBER 2 & 3, 2010

Please feel free to duplicate this form for additional registrations.

Name ______________________________

☐ CPA ☐ Attorney ☐ Other

Attorney Number ______________________________

(Required if seeking Nebraska CLE credit)

Organization ______________________________

Address ______________________________

____

____

City/State/Zip Code ______________________________

Telephone Number ______________________________

Email ______________________________

Because we compile mailing lists from many sources, you may receive more than one copy of this document. If so, please pass your extra copy to a colleague.

Thursday Breakout Session Preference (non-binding)

☐ Valuing a Closely-Held Businesses ☐ Anatomy of a Life Insurance Purchase ☐ Post Mortem Planning

FEES

☐ Standard pre-registration by November 10: $360

☐ Registration after November 10: $410

☐ Discount registration: $275
In practice 5 or fewer years

☐ Cannot attend the seminar but wish to purchase the seminar manual *(includes materials in electronic format on flash drive)*.
Manual only $225

Total Payment $______________

Mail registration to:
Great Plains Federal Tax Institute
P.O. Box 21732
Lincoln, NE 68542-1732

or register online at
http://www.greatplainstax.org
Online registration available mid-October

Make check payable to Great Plains Federal Tax Institute OR
Payment by Credit Card

☐ VISA ☐ MasterCard ☐ Discover

Card Number ______________________________

Expiration Date ____________ CVV 3-Digit code (on back of card) ____________

Name on Card ______________________________

Signature ______________________________

Billing Address if different from Registration Address

Address ______________________________

____

____

City/State/Zip Code ______________________________

____

REGISTRATION INFORMATION

REGISTRATION DESK

Registration for the Institute is located in the first floor Ballroom area and begins at 7:30 a.m. on Thursday, December 2. The registration desk will also open at 7:30 a.m. on Friday, December 3.

REGISTRATION FEES

The pre-registration fee paid by November 10 is $360. Registration fee paid thereafter is $410. People with five or fewer years of practice receive an $85 discount on the registration fee. The fee includes all materials and outlines (accessible on-line and via complimentary flash drive), Thursday and Friday luncheons, and refreshment breaks.

PRE-REGISTRATION

Complete the registration form, enclose your check made payable to the Great Plains Federal Tax Institute, and mail to Great Plains Federal Tax Institute, P.O. Box 21732, Lincoln, NE 68542-1732 or register online at http://www.greatplainstax.org. (Credit card payments are also accepted.)

REFUNDS

Registration fees are refunded, minus a $125 cancellation fee, if request is received in writing by Monday, November 22, 2010.

No refunds are made after this date. Access to electronic course materials will be provided.

CLE/CPE CREDIT

Record of attendance is kept and transmitted upon request to any jurisdiction having mandatory CLE.

CPE - This course has been approved by the **Nebraska State Board of Public Accountancy** for 16 hours total credit with 2 hours of ethics.

According to the **Iowa Accountancy Board's** web site, "It will be left to each individual license holder to determine the course of study to be pursued." For information about Chapter 10, Continuing Education, (including reporting guidelines) go to http://www.state.ia.us/government/com/prof/account/home.html.

CLE - Sponsor certifies that this activity has been approved for 13.5 hours of CLE credit, including two 2 hours of ethics credit for the **State of Nebraska**.

This course is an accredited program under the regulations of the **Iowa Supreme Court Commission on Continuing Legal Education**. It is planned that this program will provide a maximum of 13.25 hours of regular credit toward the mandatory continuing legal education requirements under the Iowa rule, including two (2) hours of ethics credit.

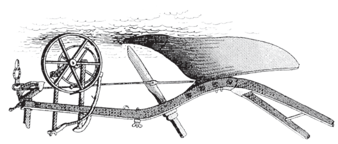
Insurance Professionals - **The State of Nebraska** has approved this course for 1-6 hours of Life credit. Course No. SA 17883

CFP - For Certified Financial Planners: Programs that have been accepted by the state board of accountancy, state bars, or state insurance commissions will be accepted for CE credit, provided topics covered are listed in Appendix A (Section 3) CFP Board of Standards.

QUESTIONS?

If you have questions regarding this Institute, please feel free to call Cindy Lilleoien at 402/483-4234 between 8 a.m. and 5 p.m., Monday through Friday. Email: cindylilleoien@aol.com

Non Profit Org.
U.S. Postage
PAID
Lincoln, NE
Permit No. 365



Great Plains
FEDERAL TAX INSTITUTE
P.O. Box 21732
Lincoln, NE 68542-1732