

Tax Conference

AGENDA AND SPEAKER INFORMATION THURSDAY, DECEMBER 14, 2023

CPE AND CLE INFORMATION

3.0 CPE credits recommended in Taxes. 3.0 CLE credits pending for Colorado, Wyoming, and Utah.

1:00-1:30 PM | REGISTRATION AND NETWORKING

1:30-1:55 PM | UPDATE ON RENEWABLE ENERGY TAX CREDITS

This session will discuss updates to renewable energy federal tax credits from recent IRS and Treasury Department guidance.

Learning Objectives

After completing this course, the participant will understand:

- · Major issues from prevailing wage and apprenticeship proposed regulations
- · Major issues from domestic content guidance
- ${\boldsymbol{\cdot}}{}$ Energy Community qualification approaches
- Low-Income Community regulations, portal and allocation considerations
- · Direct pay and credit transfer issues from proposed and temporary regulations



ADAM COHEN

Partner

303.295.8372 | Link to Bio

Adam is a trusted advisor to institutional investors, fund managers, and companies in fund formation, real estate, energy, and transactions. He is a vital leader in fund formation, corporate, merger and acquisition, master limited partnership, and real estate deal teams, working closely with other lawyers in the firm to achieve clients' transactional goals.



COLIN OLDBERG

Associate

303.295.8175 | Link to Bio

Colin skillfully guides businesses and non-profit organizations through crucial tax decisions at the federal, state, and local levels. He focuses his practice on federal income tax, including formation, structure, and operation of tax-exempt entities, low-income housing and alternative energy tax credits, mergers and acquisitions, fund formation, and a variety of other corporate and partnership tax matters.

1:55-2:20 PM | ETHICS IN AI

Learning Objectives

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

- · Obtain a background overview of general generative artificial intelligence (GGAI)
- · Obtain an understanding of the ethics rules applicable to tax professionals using GGAI



BOB KEATINGE
Of Counsel
303.295.8595 | Link to Bio

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

2:20-2:30 PM | BREAK

2:30-2:55 PM | IRS FOCUS ON CRYPTOCURRENCY: NAVIGATING TAX COMPLIANCE

Learning Objectives

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

- · Apply existing IRS guidance on cryptocurrency,
- · List IRS cryptocurrency enforcement initiatives,
- · Differentiate between client noncompliance fact patterns, and
- · Apply best practices to gather information and properly report cryptocurrency transactions.



JENNIFER BENDA
Partner
303.295.8203 | Link to Bio

Jennifer brings sophisticated experience as a tax attorney and former CPA to counsel businesses and individuals on emerging and complex tax controversy and litigation issues. Jennifer handles high dollar value, sensitive tax matters with significant legal issues at stake for businesses and individuals.



RACHEL SUPIRO
Associate
303.441.5903 | Link to Bio

Rachel advises clients on a broad range of corporate, partnership, and individual income tax matters in the context of tax litigations, controversies, and transactions. She uses her broad experience to provide clients with thoughtful and pragmatic advice.

2:55-3:20 PM | CORPORATE TRANSPARENCY ACT: WHAT YOU NEED TO KNOW NOW

Learning Objectives

After completing this course, the participant will understand:

- · Which companies are required to file reports under the CTA
- · What must be reported
- · Continuing reporting obligations
- $\boldsymbol{\cdot}$ What types of companies may be exempt from reporting obligations



TIM CRISP
Partner
303.295.8000 | Link to Bio

Tim brings sophisticated commercial finance expertise to advise a broad spectrum of lenders and borrowers. He assists clients to navigate the labyrinth of federal and state regulatory requirements to create and maintain compliant lending practices.

3:30-4:20 PM | HOT TOPICS IN TAX ENFORCEMENT

- · What You Need to Know About the IRS Focus on Partnerships
- · Moore v. U.S.: Could This Challenge to the Transition Tax Upend the US Tax Code?
- ERC: New Remediation Options for Erroneous Claims
- $\boldsymbol{\cdot}$ Offshore Accounts and Continued IRS Enforcement: Options for Coming Into Compliance

Learning Objectives

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

- · List key trends in IRS tax enforcement
- · Apply lessons learned to determine ways to minimize or correct tax errors



JENNIFER BENDA
Partner
303.295.8203 | Link to Bio

Jennifer brings sophisticated experience as a tax attorney and former CPA to counsel businesses and individuals on emerging and complex tax controversy and litigation issues. Jennifer handles high dollar value, sensitive tax matters with significant legal issues at stake for businesses and individuals.



BILL COLGIN
Partner
307.734.4510 | Link to Bio

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.



SUE COMBS
Partner
307.734.4518 | Link to Bio

Sue handles complicated and novel tax disputes and controversies for corporations, partnerships, start-ups, estates, and individuals. Her cases and controversies typically involve high dollar amounts and tend to include international tax, transfer pricing, intellectual property, economic substance, and other high-profile areas of tax dispute.



TAMMI KOTZKER
Of Counsel
303.295.8265 | Link to Bio

Tammi leverages her vast government experience in tax controversy and litigation to support clients dealing with high stakes tax matters. She brings extensive experience from a career in both government and private practice.



MATT WRIGHT Associate 303.295.8161 | Link to Bio

Matt develops real-world strategies to solve complex problems for his clients on high-stakes tax controversies, litigation, and other matters. He draws on his significant policy development and legal risk management experience to help clients navigate a wide variety of adversarial and administrative forums.

4:20-6:00 PM | NETWORKING AND HAPPY HOUR

ABOUT THE FIRM

Throughout the Mountain West, from coast to coast and beyond, Holland & Hart provides clients with astute legal service from a vantage like no other. For more information, visit hollandhart.com.