



Estate Planning Council of Greater Miami
8th Annual Estate Planning Symposium ♦ Tuesday, February 11, 2020
University of Miami Watsco Center, 1245 Dauer Drive, Coral Gables, Florida

AGENDA

8:00 – 8:30am Breakfast, Registration and Networking with Sponsors

8:30 – 8:45am Welcome and Introductions

8:45 – 9:35am PRE-U.S. IMMIGRATION TAX PLANNING USING INSURANCE WRAPPERS AND USING LIFE INSURANCE TO MITIGATE THE THROWBACK TAX

MICHAEL KOSNITZKY, JD ♦ Pillsbury Winthrop Shaw Pittman LLP ♦ Miami, FL

This presentation will discuss the basics of pre-immigration tax planning as well as pre-U.S. domicile gifting and the creation of a “drop off trust.” The session will also discuss the taxation of foreign non-grantor trusts; the general taxation of trusts; and an overview of the “throwback tax” rules, along with solutions for mitigating Undistributed Net Income or UNI. Finally, the presentation will provide examples of strategies using life insurance to mitigate the throwback tax.

9:40 – 10:30am DON'T PANIC! 42 THINGS TO LOOK OUT FOR AT THE INTERSECTION OF BUSINESS ENTITIES AND ESTATE PLANNING

CRISTIN C. KEANE, JD, LLM ♦ Carlton Fields, P.A. ♦ Tampa, FL

Whether your client has existing business entities that need to be considered in his or her estate plan or you are looking to utilize a business entity to effectuate the estate plan, the type of entity you are dealing with can make a big difference. This presentation will focus on tax and state law considerations related to the lifetime and testamentary transfers of business interests, as well as the choice of entity opportunities and considerations when developing and implementing the estate plan.

10:30 – 10:50am Break and Networking with Sponsors

10:50am – 12:05pm U.S. PERSONS HAVING INTERESTS IN NON-U.S. ESTATES AND TRUSTS

SIMON P. BECK, ESQ. ♦ Baker McKenzie ♦ New York, NY

MADELAYNE CORDERO, JD, TEP ♦ City National Wealth Management ♦ Miami, FL

MARIA TOLEDO, CPA, MST ♦ Kaufman Rossin ♦ Miami, FL

U.S. grantors and beneficiaries of foreign trusts have complex and different reporting requirements from those that are imposed on domestic trusts (i.e. U.S. trusts). The taxation of the income and distributions is also different and depends on how the foreign trust is classified for U.S. federal income tax purposes and the beneficiaries' status as U.S. or foreign persons at the time of distribution. This presentation will provide an introduction to the tax rules that classify a trust as foreign or domestic, the U.S. federal taxation that results from having a foreign trust, and the IRS reporting requirements you should be aware of when there is a foreign trust.

12:05 – 1:15pm Luncheon and Networking with Sponsors

1:15 – 2:55pm PLANNING FOR THE “NON-TAXABLE” ESTATE

PAUL S. LEE, JD, LLM ♦ The Northern Trust Company ♦ New York, NY

This presentation will discuss what advisors should tell their wealthy (but not ultra-wealthy) clients who no longer have a Federal estate tax problem because of the very high (and temporarily doubled) applicable exclusion amounts. It will discuss innovative estate and income tax planning techniques in light of estates of varying sizes, the risk of expiring exclusions, the “anti-clawback” regulations, and state income and death tax considerations.

2:55 – 3:15pm Break and Networking with Sponsors

3:15 – 4:05pm JOINT REVOCABLE TRUSTS: DOMESTIC & INTERNATIONAL CONSIDERATIONS & PITFALLS

PATRICK J. LANNON, JD ♦ Shutts & Bowen LLP ♦ Miami, FL

JENNIFER J. WIONCEK, JD, LLM ♦ Bilzin Sumberg ♦ Miami, FL

Clients often prefer joint revocable trusts because they appear to match their treatment of “marital” assets. However, the appearance does not match the reality in separate property jurisdictions. The appearance of simplicity is misleading and can create unexpected complications and litigation. Joint revocable trusts can be the best tool for community property, but can also create substantial complexity if there is a mix of community and separate property.

4:10 – 5:00pm TAX AND RETIREMENT PLANNING ROUNDTABLE – THE SECURE ACT AND THE NEW AGE OF IRAS, 401(K)S, AND QUALIFIED PLANS

BENJAMIN D. BOHLMANN, CPA ♦ Bohlmann Accounting Group, PLLC ♦ Miami, FL

PATRICIA L. GREEN, CPA, CSEP ♦ EisnerAmper ♦ Miami, FL

PHILIP HERZBERG, CFP®, CTFA, AEP®, MSF ♦ The Lubitz Financial Group ♦ Miami, FL

The Setting Every Community Up for Retirement Enhancement (SECURE) Act, if signed into law, would create the most significant changes to retirement planning since the 2006 Pension Protection Act, including: the elimination of “the stretch IRA”; Required Minimum Distribution (RMD) provisions; the age cap for IRA contributions; 401(k) eligibility for part-time employees; Multiple Employer Plans (MEPs) for small businesses; and access to annuities as investment options. This panel will discuss proposed changes; highlight best practices for clients and their families to maximize tax savings and retirement income; and provide alternative planning opportunities to grow wealth and minimize taxes in light of the SECURE Act.

5:00pm Wrap up and raffles

ABOUT OUR SPEAKERS

SIMON P. BECK, ESQ. is a partner and chair of the North America Wealth Management Group at Baker McKenzie's New York office. Simon is an international tax and trust lawyer with vast experience working in the world's trust and financial centers. He has also practiced in Miami, London, Monte Carlo and Madrid, and was head of Legal, Compliance and Trust & Fiduciary Services for Coutts, one of the world's leading private banking institutions, prior to joining Baker McKenzie. Simon lectures regularly on trust, financial service and compliance issues at global wealth management and international trust and estate planning conferences around the world. Simon focuses his practice on international tax and trust planning, as well as US federal and international securities and banking regulations. He advises the world's wealthiest families, global institutions, family offices and trust companies, and is a recognized leader in the use of Private Trust Companies.



BENJAMIN D. BOHLMANN, CPA is the managing partner and founder of Bohlmann Accounting Group PLLC, a Miami-based boutique CPA firm. Bohlmann Accounting Group serves small and mid-sized private enterprises and family groups from all over the world. Benjamin leads 15 dedicated professionals, advises dynamic business owners on complex and diversified multi-national structures, and collaborates with family groups to assure wealth for future generations. Benjamin participates in the Society of Trust and Estate Professionals (STEP), is the current Chair of the Beacon Council's International Advisory Committee, the vice-chair of HistoryMiami's Endowment Board and sits on the Executive Committee of DFK USA, an international association of independent accounting firms.



MADLAYNE CORDERO, JD, TEP is Managing Director, Wealth Management and Chief Fiduciary Officer with City National Wealth Management and is a member of the group's senior management team. She is responsible for fiduciary and estate services to its private wealth clients. Prior to joining City National, Madelayne served in a similar capacity with Gibraltar Bank and Trust, Coral Gables, where she was a Senior Vice President and Chief Fiduciary Officer. Prior to Gibraltar Private, she worked in the Trust and Fiduciary Banking field having started her career at Northern Trust Bank of Florida over 19 years ago. Her major focus has been in planning and implementing succession plans for US, Foreign and Cross-Border Families through the use of trusts, foreign trusts, corporate structures, foundations and charitable trusts. Madelayne received a B.B.A. degree, cum laude, from Florida International University in Miami, Florida, and a J.D. degree from Concord University, where she was named a distinguished alumnus. Madelayne serves on the Board of Directors of the Society of Trust and Estate Practitioners (STEP) Miami Chapter, she is a member of The Cuban American Bar Association. She has lectured on estate planning, trust administration, fiduciary risk management and wealth structuring for cross-border families. She serves on the Board of Alumni for Immaculata LaSalle High School in Coconut Grove, Florida and she is a member of the Alumni Associations of Florida International University and Concord University.



PATRICIA L. GREEN, CPA, CSEP is Tax Director at EisnerAmper, and leads the Trust and Estate Practice in the firm's Florida offices. She has over 30 years of experience providing tax services to small businesses, individuals, trusts and estates. Patricia has expertise in tax compliance, estate and gift tax, wealth transfer, and succession planning. She serves as an advisor to businesses, entrepreneurs and high net worth individuals. Patricia's focus for more than 20 years is in trust and estate planning and tax compliance. Her expertise includes an in-depth knowledge of gift, estate, fiduciary accounting and income tax returns, private foundations, charitable remainder trusts and post mortem planning. She received her BSBA from the University of Florida, and is affiliated with the American Institute of Certified Public Accountants, Florida Institute of Certified Public Accountants, Greater Miami Tax Institute, Coral Gables/South Dade Estate Planning Council, and the Women Presidents' Organization.



PHILIP HERZBERG, CFP®, CTFA, AEP®, MSF delivers strategic financial planning advice to high net worth individuals and families as a Client Advisor for The Lubitz Financial Group. He is a Certified Financial Planner® professional, Certified Trust and Financial Advisor, and Accredited Estate Planner® designee with almost 15 years of professional experience. Serving on The Lubitz Financial Group's Financial Planning and Advisory Committees, Philip utilizes this experience to help clients implement tax-efficient investment, retirement, and estate planning strategies. Prior to joining The Lubitz Financial Group, Philip was a Relationship Manager at United Capital and Client Services Manager at Ladenburg Thalmann. A Northwestern University graduate with a Bachelor of Science in Speech with departmental honors, he earned a Master of Science in Finance from Florida International University with a graduate certificate in Investments. Recognized as a devoted ambassador to his profession, Philip is Immediate Past President of the Estate Planning Council of Greater Miami, Past President of the Financial Planning Association (FPA®) of Florida, and Past President of the FPA of Miami. A *Journal of Financial Planning* Tax & Estate columnist, Mr. Herzberg has authored or contributed to over 50 peer-reviewed estate, tax, and financial planning articles. He has been cited as an authority in regional and national media publications, including the *Wall Street Journal*, *Morningstar*, *Marketwatch*, *Barron's*, *InvestmentNews*, *Financial Advisor Magazine*, *Miami Herald*, and *South Florida Sun-Sentinel*. He is also a featured speaker for local and national professional organization audiences, such as the Estate Planning Council, Florida Institute of Certified Public Accountants (FICPA), FPA, the United Way of Miami-Dade, and the Jewish Community Foundation's Professional Advisory Council (PAC). Philip delights in altruistically giving back to his South Florida community. The recipient of the Joan & Douglas Gross Community Service Award for his stewardship as Young Leadership Division (YLD) Mitzvah Co-Chair, Philip proudly serves on the Jewish Federation of Broward County's Finance and Chai Care Committees.



CRISTIN C. KEANE, JD, LL.M. is a shareholder at Carlton Fields, P.A., in Tampa, a past Chair of the Florida Bar Tax Section, and Florida Bar Board Certified in Tax Law. Cristin practices in the areas of business and tax law, tax exempt organizations, and wealth preservation planning, particularly with respect to LLCs, partnerships, and estates containing business interests. Cristin represents for profit and not for profit organizations in tax, contract matters, and governance issues. She received her undergraduate degree from Duke University, and J.D. and LL.M. in Taxation degrees from the University of Florida. She served as a Visiting Assistant Professor at the UF Graduate Tax LL.M. Program.



MICHAEL KOSNITZKY, JD, co-leader of Pillsbury Winthrop Shaw Pittman LLP's Private Wealth practice, advises some of the world's most well-respected individuals, families and privately held businesses, using a holistic risk-assessment approach to the tax law. Mike has been recognized as a Trust and Estates Trailblazer by the *National Law Journal* for his focus on where IRS policy is going and not necessarily where it stands today. His tax-minimizing strategies guide financial and strategic buyers in complex taxable and tax-free mergers and acquisitions; privately held businesses in estate tax-efficient succession planning; private investment funds in their choice of jurisdictions and structures; wealthy families in generational real estate income tax and estate tax planning; individuals and family offices regarding artwork and collectables; and ultra-high-net-worth individuals in U.S. and foreign trust matters. Mike, who is also a certified public accountant, is a prolific writer on diverse tax topics and the co-author of two treatises on S corporations: *The S Corporation: Planning and Operation* and *The S Corporation Answer Book*, both Wolters Kluwer publications. Mike is recognized as one of the nation's most respected and creative tax lawyers by Chambers USA, The Legal 500 U.S., Best Lawyers and Super Lawyers.



PATRICK J. LANNON, JD is a partner with the Miami office of Shutts & Bowen LLP, where he is a member of the Private Client Services Practice Group. Patrick is Florida Bar Board Certified in Wills, Trusts and Estates. Patrick represents high-net-worth individuals both domestic and international with their estate, asset protection, and charitable planning with a focus on integrating family wealth transfer goals with sophisticated business succession, income, and estate tax planning strategies. He also assists personal representatives, trustees, and beneficiaries with estate and trust administration and advises fiduciaries and beneficiaries in contested or potentially contested trust and estate matters. He obtained his J.D. from Harvard University.



PAUL S. LEE, JD, LL.M. is the Global Fiduciary Strategist of The Northern Trust Company, within the Global Family & Private Investment Offices Group and Wealth Management division of Northern Trust. He is also a Senior Vice President and Managing Director of the company. Prior to joining Northern Trust, he was at Bernstein Global Wealth Management as National Managing Director, and a partner in the Atlanta-based law firm of Smith, Gambrell & Russell, LLP. Paul is a Fellow of the American College of Trusts and Estate Counsel, has been inducted into the NAEPC Estate Planning Hall of Fame®, and designated an Accredited Estate Planner® (Distinguished). He is the American Bar Association Advisor to the Uniform Law Commission Uniform Fiduciary Income and Principal Act. Paul is a member of the American Bar Association, Florida Bar, and State Bar of Georgia. Paul received a B.A., cum laude, in English and a B.A. in chemistry from Cornell University, and a J.D., with honors, from Emory University School of Law, where he was notes and comments editor of the *Emory Law Journal*; he also received an LL.M. in taxation from Emory University. Paul was the recipient of the Georgia Federal Tax Conference Award for Outstanding Tax Student and the Ernst & Young Award for Tax and Accounting. A frequent lecturer and panelist on investment planning, tax and estate planning, Paul has spoken at the Heckerling Institute on Estate Planning, *ACTEC* National Meeting, Southern Federal Tax Institute, USC Institute on Federal Taxation, Southern California Tax & Estate Planning Forum, Notre Dame Tax and Estate Planning Institute, AICPA National Tax Conference, and the AICPA Advanced Estate Planning Conference. His articles have been published by *The ACTEC Law Journal*, *Tax Notes*, *BNA Tax Management Estates, Gifts & Trusts Journal*, *BNA Tax Management Memorandum*, *Estate Planning Journal*, *Trusts & Estates*, *Estate Planning & Community Property Law Journal*, *The Practical Tax Lawyer*, *Major Tax Planning*, and the *Emory Law Journal*. Paul co-authored the law review article, "Retaining, Sustaining and Obtaining Basis," which was awarded Outstanding Law Review Article in 2016 by the Texas Bar Foundation. He is a member of the Advisory Committee of the Heckerling Institute on Estate Planning, Bloomberg BNA Estates, Gifts and Trusts Advisory Board, the University of Florida Tax Institute Advisory Board, and the Wilson Society Advisory Council for the Hospital for Special Surgery in New York City.



MARIA TOLEDO, CPA, MST, of Kaufman Rossin in Miami, helps domestic and foreign privately-held companies, closely-held businesses and high-net worth individuals navigate the tax compliance experience as they conduct business and acquire real estate in the U.S. A leader of the firm's offshore voluntary disclosure and streamlined procedures program, Maria has counseled more than 100 clients with undisclosed income from offshore accounts to minimize their tax and reduce penalties. She also provides international tax planning and structuring services to foreign clients interested in U.S. real estate. Maria helps them comply with the Foreign Investment in Real Property Tax Act (FIRPTA) and obtain withholding certificates. Maria has worked with international tax clients, including corporations, foreign nationals and expatriates, for more than a decade. When foreigners are interested in establishing businesses in the U.S., Maria works with their attorneys to obtain tax ID numbers and assists clients with pre-immigration tax planning. She also develops accounting strategies for their U.S. business plans and helps them comply with the Foreign Account Tax Compliance Act. She is a member of the Ecuadorian American Chamber of Commerce in Miami and the Florida International Bankers Association Women's Leadership Committee. Maria is director and treasurer of the Society of Trust and Estate Practitioners' Miami branch. She leads the firm's diversity initiative, including Kaufman Rossin Empowering Women, dedicated to fostering an inclusive culture and advancing employees' leadership skills. Maria is a Certified Public Accountant in Florida and a member of the American Institute of Certified Public Accountants and the Florida Institute of Certified Public Accountants. She is fluent in English and Spanish. She received her Bachelor of Science in Accounting and a Master of Science in Tax from Florida International University.



JENNIFER J. WIONCEK, JD, LL.M. is a partner in the law firm of Bilzin Sumberg Baena Price & Axelrod LLP. She is recognized as a leading Tax and Trusts & Estates lawyer in Chambers, *Citywealth*, Florida Super Lawyers and South Florida Legal Guide, and previously recognized by the *Florida Daily Business Review* as one of their "40 under 40 Rising Stars." Ms. Wioncek has general international tax planning experience and has significant experience with domestic and international trust and estate planning matters for high net worth individuals; multijurisdictional estate administration matters; acquisition, maintenance and sale of U.S. real estate by foreigners; pre-immigration planning; expatriation planning; international reporting and compliance; offshore voluntary compliance; and representation of family offices. Jennifer is also an active adjunct professor at the University of Miami School of Law Tax LL.M. program teaching multiple classes in the area of Trusts & Estates. She is also a board member of STEP Miami with TEP designation. She received her joint J.D. and Masters of Science degrees from Saint Thomas University School of Law and her LL.M. in Taxation from New York University School of Law.





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REGISTRATION FORM

FEES

[1/1/20 - 1/31/20](#): EPC Members - \$215.00 | Non-Members - \$265.00
[2/1/20 through event](#): EPC Members - \$250.00 | Non-Members - \$295.00
Full-time Students: \$95.00

HOW TO REGISTER

TO PAY ONLINE: Complete registration form and pay online at [EPC of Greater Miami's Event Page](#)

OR

EMAIL: Scan and email registration form with credit card information to info@epcmiami.org

OR

MAIL: Mail registration form with check payable to *EPC of Greater Miami* or credit card information to [EPC of Greater Miami ♦ c/o Manageability ♦ 1821 Hillandale Rd., Suite 1B-320 ♦ Durham, NC 27705-2659](#)

OR

FAX: Fax registration form with credit card information to **919-287-2711**

PLEASE PRINT CLEARLY!

First Name	MI	Last Name	Designations
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Title/Position

Company

Mailing Address	City	State	Zip
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E-mail	Day Telephone	Nickname for badge
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Credit Card #	Exp. Date	Sec. Code	Amount
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Credit Card Billing Address (if different from above)

Signature	Date
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Continuing Education

- **CLE:** Approved by The Florida Bar for seven and one-half (7.5) hours of CLE credit – *General CLE Credits: 7.5 hours // Certification Credits: Business Litigation: 1 hour; Elder Law: 7.5; Immigration and Nationality Law: 1 hour; International Law: 2.5 hours; International Litigation & Arbitration: 2.5 hours; Tax Law: 4.0 hours; Wills, Trusts & Estates: 7.5 hours*
- **CFP:** Accepted by the Certified Financial Planner Board of Standards, Inc. for seven and one-half (7.5) hours of CE credit for CFP® Certificants
- **FL Insurance:** Approved for seven (7) hours of Florida Insurance CE credit from the Florida Department of Financial Services.
- **CTFA:** Approved for seven and one-half (7.5) hours of CTFA CE credit; one (1) hour CISP CE credit; and one (1) hour CRSP CE credit
- **CPE for CPAs:** Qualifies for seven and one-half (7.5) hours of self-reported CPE credit for Florida CPAs
- **CLU, ChFC:** Qualifies for seven and one-half (7.5) hours of self-reported PACE CE credit (CLU, ChFC) from the American College
- **CIMA, CPWA:** Qualifies for seven and one-half (7.5) hours of CIMA and CPWA CE upon self-reporting & review by Investments and Wealth Institute

Questions?

info@epcmiami.org | www.epcmiami.org | **919-908-6178**

Cancellations received in writing by January 31, 2020, will receive a full refund, less a \$25 administrative fee. There will be no refunds after January 31, 2020. All fees must be paid in advance. By your signature above, you hereby authorize Estate Planning Council of Greater Miami to debit your credit card for the total amount, and have read and understand the cancellation/refund policy of this registration agreement. Program subject to change. Please contact us with any special access or dietary needs.