**Dear Fellow Tax Section Members:** 

As we are all keenly aware, the past year has thrown the whole world for a bit of a loop. I am delighted to report that the Tax Section has been busy at work on behalf of our members. I have included highlights of our activities below.

Thank you to our Texas Tax Lawyer editor, **Aaron Borden**. We hope you benefit from the informative and interesting articles included in this edition.

## **Tax Section Annual Meeting**

The bar has recently announced that the 2021 Annual Meeting will be held via Zoom once again this year. Details are still being worked out, but rest assured that the Tax Section will be having programming on Friday, June 18, 2021. There is sure to be an outstanding line up, so please mark your calendars now and plan to attend! More details to come.

## First Wednesday Tax Update

Bruce McGovern, Professor of Law and Director, Tax Clinic, South Texas College of Law Houston, continues to provide his popular monthly tax update.

Below are some important reminders about the Monthly Update.

- The registration link is sent via eblast about a week before the first Wednesday of the month.
- The registration link can also be found at the <u>Texas Tax Section</u> website a week before the update.
- A member cannot sign up for the update once the live broadcast has begun.
- If for any reason you do not receive the eblast, you can register by going to the Texas Tax Section website.
- Members are required to self-report their CLE credit as we are unable to report on your behalf due to the virtual nature of the presentation. The CLE number will be provided in both an email to all registrants and at the end of the update.
- The recorded program is posted online in the <u>24/7 Library</u> a few weeks after the live program. Members can log in to the <u>Texas Tax Section</u> website to watch it for CLE credit.

# **Annual Comptroller Briefing**

The Annual Comptroller Briefing that is jointly sponsored by the Texas Comptroller's Office and Tax Section was held virtually on January 12-14, 2021 and was a resounding success. Thanks to the SALT Committee leadership for coordinating and participating in the event.

## Tax Law in Day

Tax Law in a Day is a seminar specifically designed to provide information on a wide variety of basic tax topics. **Renesha Fountain**, Tax Section Council member, and **Harriet Wessel**, coordinated this year's Tax Law in a Day, which was held as a virtual meeting over two days, February 4 and 5, 2021. The programs were outstanding and we had record attendance. A special thanks to all of the speakers for sharing their knowledge and to Renesha and Harriet for their leadership!

## A Deep Dive into the Carried Interest Regulations

An advanced tax law webinar that focuses on the Carried Interest Regulations will be held via Zoom on April 23, 2021 from 10:30 a.m. to 2:30 p.m. Chair-Elect **Dan Baucum** is coordinating the programming, and it will be a program you will not want to miss!

### **Committee on Government Submissions**

The Committee on Government Submissions continues its work under the leadership of **Sam Megally**, **Jason Freeman**, and **Josh Prywes**.

On January 25, 2021, the Tax Section submitted comments to the Internal Revenue Service regarding the Proposed Regulations on the Centralized Audit Regime. The principal drafters of the comments were **Lee S. Meyercord** and **Jackson Oliver**. **Mary A. McNulty**, past Chair of the Tax Section and member of the Partnership and Real Estate Tax Committee, also reviewed the Comments and provided substantive suggestions. The comments are included in this edition. Lee and Jackson also testified on March 25, 2021 at a virtual hearing to provide helpful testimony to the IRS and Treasury.

The work of the COGS committee continues to ensure that new regulatory provisions work as intended and any inconsistencies can be corrected before the finalization of the regulations and rules. This is a meaningful service to our profession and to the public in general. I commend all Tax Section members who have worked so hard in this important endeavor.

### **Law School Outreach**

The Law School Outreach Committee is responsible for visiting each law school in Texas to give a behind-the-scenes view of a tax attorney. This program has transitioned to online presentations at the law schools this year. Please see the <u>Tax Section calendar</u> for dates for other school visits. A special thanks to **Audrey Morris** who has diligently tracked down our busy law school coordinators to get these scheduled.

## **Scholarship Applications**

The Law School Outreach Committee also manages the Tax Section's annual scholarship program. Professor **Alyson Outenreath** is once again coordinating this process. This year the Tax Section plans to again award up to three scholarships to law students

intending to practice tax law in Texas. Applications are available now and are due on April 16, 2021. A copy of the scholarship applications is included in this edition. Please pass this along to any qualified candidates you know.

### **Pro Bono Committee**

The Tax Section's Tax Court Pro Bono program for both Tax Court trial sessions and settlement days in advance of the trial sessions have been held virtually. Because of our robust program, we also participated by request in tax court proceedings in Nevada and Florida. Our work in this area is widely known and recognized. The recently adopted rules of professional misconduct will make helping others even easier!

The section also participated in the Adopt-a-Base program again this year, by doing extensive training at Fort Bliss, Goodfellow Air Force Base, and Joint Base San Antonio. If you are interested in participating in these worthy endeavors or have any questions, please contact a member of the <u>Pro Bono Committee</u>. The work of this committee is some of the most meaningful work we can do for the public. All lawyers who assist in these projects have earned my highest regard. A very special thanks to **Bob Probasco** and **Rachael Rubenstein** who have worked so hard this year in helping others.

### Welcome to our new Ex Officio Council Member

Due to a change in responsibility, **James D. Arbogast**, Chief Counsel for Tax Hearings and Litigation at the Texas Comptroller of Public Accounts, has had to step down in his position with the Council, but we are happy to welcome **Bree Boyett**, Tax Litigation Attorney, as the ex officio Council Member representing the Texas Comptroller of Public Accounts.

## **Sponsors**

We heartily thank all of our sponsors for 2020-2021. They include Sapphire Level Sponsors Thompson & Knight and Chamberlain Hrdlicka, Platinum Sponsor Glast, Phillips & Murray, and Gold Sponsors Baucum Law, Davis Stephenson, Law Office of Catherine Scheid, and Mondrik & Associates. This year was complicated for many reasons, and the Section is grateful for the continued support of these law firms during the challenging times.

### **Contact Information**

Please feel free to contact me or our Tax Section Administrator, Anne Schwartz, if you have any questions or would like additional information about any of these items or the Tax Section in general.

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