INTRODUCTION

As we did in January of 1997, 1998 and 1999, and again with the permission of the University of Miami School of Law Center for Continuing Legal Education, we will be posting to this list throughout the coming week highlights of the proceedings of the 34th Annual Philip E. Heckerling Institute on Estate Planning that is being held January 10-14, 2000 at the Fontainebleau Hilton in Miami Beach, Florida.

Our **on-site local reporters** there in Miami will include:

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For those of you without access to the Web, here are the core parts of the schedule:

Scope of Institute

The "Miami Institute" is widely recognized as the premier estate planning program in the country. It is designed for sophisticated attorneys, trust officers, accountants, insurance and financial planners who, through years of experience and practice, are familiar with the principles of estate planning. Its faculty is drawn from the nation's leading estate planning experts, and the papers they produce are considered authoritative on their subjects.

The Institute offers something of interest to every member of the estate planning team. This year's program features a new Case Study series that will illustrate and provide practical guidance on how to implement sophisticated estate planning techniques. Also new this year is the recent developments panel on Monday afternoon featuring three of the nation's foremost estate planning experts, who will guide you through the year's developments on the tax front. The same distinguished panel of experts will be available to answer your questions the next morning during the first of two question and answer sessions. In addition, this year's Institute includes our popular Fundamentals Program, which begins with an optional pre-conference session on planning and drafting for life insurance. The other two fundamentals sessions will be offered during our regular programming schedule, and will cover tax-related drafting and the mathematics of estate planning. The remainder of the program features a wide variety of lectures, workshops, and panel discussions on topics of timely interest to estate planning professionals.

Because of the scope and quality of its program, the Institute has grown to be the largest such gathering of estate planning professionals in the country. Over the past several years attendance at the Institute has risen dramatically, with a record number of over 2,200 estate planning professionals from around the nation in attendance at last year's program. This concentration of estate planning talent has led the Institute to have some of the better characteristics of a national convention of estate planners. Attendees have the opportunity to exchange ideas, to network, and to review the latest in technology and services made available to estate planners by more than 80 book and software publishers, auction houses, trust companies, and other service providers exhibiting at the Institute.

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PROGRAM SCHEDULE:

Sunday, January 9

12:00 6:00 p.m.

Registration

Monday, January 10

8:00 a.m. 2:00 p.m.

Registration

8:00 a.m. 9:00 a.m.

Complimentary Continental Breakfast

9:00 a.m. 10:30 a.m. and

10:45 a.m. - 12:15 p.m.

Optional Pre-Conference Fundamentals Program

The Fundamentals of Using Life Insurance in Estate Planning, Including

Planning and Drafting Irrevocable Insurance Trusts. Lawrence Brody

Donald O. Jansen

10:30 a.m. 10:45 a.m.

Break

2:00 - 2:10 p.m.

Introductory Remarks

Tina Hestrom Portuondo, Esq.

Director C Philip E. Heckerling Institute

2:10 3:30 p.m.

Recent Developments in Estate, Gift and

Income Taxation - 1999 - Part One

Richard B. Covey, Esq.

S. Stacy Eastland

Malcolm A. Moore

3:30 3:45 p.m.

Break

3:45 5:15 p.m.

Recent Developments in Estate, Gift and

Income Taxation - 1999 - Part Two

6:00 7:00 p.m.

Complimentary Reception for Registrants

Tuesday, January 11

8:00 9:00 a.m.

Complimentary Continental Breakfast

9:00 10:30 a.m.

Question & Answer I

Richard B. Covey, Esq.

Dave L. Cornfeld

S. Stacy Eastland

Malcolm A. Moore

10:30 10:45 a.m.

Break

10:45 11:30 a.m.

When IRD Meets ERISA: Making Retirement Benefits

Payable to Trusts

Natalie B. Choate

11:30 a.m. 12:15 p.m.

Life Insurance Potpourri No Employer?

Try Family Split Dollar Other Recent Developments

Donald O. Jansen

12:15 2:00 p.m.

Lunch Break

2:00 2:45 p.m.

Remembering the Grandchildren Leverage,

Discount and Freeze Perpetually

Georgiana J. Slade

2:45 3:30 p.m.

Guiding (Controlling?) the Children and Grandchildren:

Planning and Drafting to Influence Behavior

Howard M. McCue III

3:30 3:45 p.m.

Break

3:45 4:30 p.m.

Taking the "Foreign" Out of Foreign Trusts Recognizing

Them and Advising U.S. Clients with Connections to Them

Maria E. Núñez

4:30 5:15 p.m.

Picking Up the Pieces When Law and Ethics Collide

Bruce S. Ross

Wednesday, January 12

8:00 9:00 a.m.

Complimentary Continental Breakfast

9:00 9:45 a.m.

To Be or Not To Be: An LLC, LP, LLP, S or a C

Louis A. Mezzullo

9:45 10:30 a.m.

Making Sure Your Transfer Tax Planning Doesn't Create

Income Tax Nightmares When You Sell the Family Business

Richard B. Robinson

10:30 10:45 a.m.

Break

10:45 11:30 a.m.

Fractionalized Equity Valuation Planning: An Egyptian

Mortician's Techniques for Preserving (Mummifying)

Post-Mortem Valuation Discounts

Susan K. Smith

11:30 a.m. 12:15 p.m.

After the Fact, But It's Still Not Too Late An Overview of Post-Mortem

Tax Planning Strategies

Steve R. Akers

12:15 2:00 p.m.

Lunch Break

2:00 5:15 p.m.

Fundamentals Program Millennium Schminium:

Is Your Tax Drafting Y2K Compliant?

(Runs concurrently with the Special Sessions)

M. Read Moore

David Powell

2:00 3:30 p.m.

Special Sessions I

I-A CASE STUDY Retirement Benefits Payable to Trusts

Natalie B. Choate

I-B Hot Transfer Tax Valuation Issues

Susan K. Smith

Judge David Laro

John W. Porter

I-C The Total Return Trust Revolution: An Introduction

Robert B. Wolf

Stephan R. Leimberg

Susan Porter

I-D GSTT: Lifetime Transfers

Georgiana J. Slade

I-E Foreign Trusts

Maria E. Núñez

3:30 3:45 p.m.

Break

3:45 5:15 p.m.

Special Sessions II

II-A CASE STUDY Total Return Trusts:

Techniques and Applications

Robert B. Wolf

Bruce A. Guiot

II-B Charitable Planning Update @ Y2K

Jerry J. McCoy

II-C When Law and Ethics Collide

Bruce S. Ross

II-D Post-Mortem Tax Planning

Steve R. Akers

II-E Choice of Entity

Louis A. Mezzullo

Thursday, January 13

8:00 9:00 a.m.

Complimentary Continental Breakfast

9:00 9:45 a.m.

Giving Well is the Best Revenge:

Planning Opportunities with Stock Options

Daniel H. Markstein, III

9:45 10:30 a.m

No More "Gravy Train": 1997 Law Revisions Dramatically

Affect the Economics of CRTs Only Those With True

Charitable Motivation Should Create Them

Byrle M. Abbin

10:30 10:45 a.m.

Break

10:45 11:30 a.m.

Non-Charitable Inter Vivos Gifts A Plan for Tax Relief

James W. Narron

11:30 a.m. 12:15 p.m.

Beyond the Basic Freeze: Further Uses of

Deferred Payment Sales and Avoiding the Meltdown

Jerome M. Hesch

12:15 2:00 p.m.

Lunch Break

2:00 3:30 p.m. and

3:45 5:15 p.m.

Fundamentals Program Numbers Matter:

(Runs concurrently with the Special Sessions)

Lawrence P. Katzenstein

2:00 3:30 p.m

Special Sessions III

III-A CASE STUDY Putting It All Together:

A Potpourri of Potential Plans

Jon J. Gallo

III-B Hot Transfer Tax Valuation Issues

(Repeat of Session I-B)

Susan K. Smith

Judge David Laro

John W. Porter

III-C Ethical Issues and Developments in Multidisciplinary Practice

Donna Barwick

Dennis I. Belcher

Samuel A. DiPiazza, Jr.

Douglas W. Duncan

Sherwin P. Simmons

III-D Planning and Drafting to Influence Behavior

Howard M. McCue III

III-E Planning Opportunities with Stock Options

Daniel H. Markstein, III

3:30 3:45 p.m.

Break

3:45 5:15 p.m.

Special Sessions IV

IV-A CASE STUDY Putting It All Together:

A Potpourri of Potential Plans (Continued)

Jon J. Gallo

IV-B CRTs and CLTs

Byrle M. Abbin

Jonathan Gopman

IV-C Non-Charitable Inter Vivos Gifts

James W. Narron

IV-D Sale of the Family Business

Richard B. Robinson

IV-E Deferred Payment Sales

Jerome M. Hesch

Friday, January 14

8:00 9:00 a.m. Complimentary Continental Breakfast

9:00 9:45 a.m.

Coming Soon to Your State: Community Property

M. Read Moore

9:45 10:30 a.m.

A Significant Challenge: Estate Planning for Individuals

Worth $3 Million or Less

Jonathan G. Blattmachr

10:30 10:45 a.m.

Break

10:45 a.m. 12:15 p.m.

Question & Answer II

Alan D. Bonapart

Louis A. Mezzullo

Susan Porter

Edward S. Schlesinger

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