HECKERLING INSTITUTE 2001
OPENING REMARKS

As we did in January of the last four years, 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 weeks highlights of the proceedings of the 35th Annual Philip E. Heckerling Institute on Estate Planning that is being held January 8-12, 2001 at the Fontainebleau Hilton Resort and Towers in Miami Beach, Florida.

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

Steve Leimberg Esq. of Bryn Mawr, PA - leimberg@home.com
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Again this year a complete listing of the proceedings and speakers is available on the Institute's Web site. The new URL for that site is <http://www.law.miami.edu/heckerling>
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OPENING REMARKS - - JANUARY, 2001

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Again this year a complete listing of the proceedings and speakers is available on the Institute's Web site. The new URL for that site is http://www.law.miami.edu/heckerling For those of you without access to the Web, here are the core parts of the schedule:

SCOPE:

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. The Institute offers something of interest to every member of the estate planning team.

A recent developments panel on Monday afternoon, featuring three of the nation's foremost estate planning experts, will guide you through the year's developments on the tax front. The same distinguished panel will be joined the next morning by a speaker from the Internal Revenue Service for the first of two question and answer sessions.

Tuesday's program features the beginning of our general session lectures. The lectures provide in-depth analysis of topics of timely interest to experienced estate planners, and are presented by some of the nation's leading authorities.

On Wednesday and Thursday afternoons, the Institute offers a wide variety of workshops and panel discussions, including case studies that will illustrate and provide practical guidance on how to implement sophisticated estate planning techniques. In addition, there will be a repeat Special Session entitled "2001: A Tech Odyssey" covering all aspects of conducting an automated trusts and estates law practice in the 21st Century. All Institute registrants are invited to complete the Survey that has been posted on the Web for this Session before arriving in Miami. The URL is http://members.iex.net/~jghodges/miami2001.html.

Finally, this year's Institute once again includes our popular Fundamentals Program. The first two fundamentals sessions will provide a thorough review of two topics central to the estate planning process: planning for qualified retirement plan benefits and IRAs, and the use of GRATs, GRUTs and QPRTs. The final session differs from our traditional offerings by examining the income tax principles applicable to family limited partnerships - a topic of increasing importance to estate planners.

Because of the scope and quality of its educational programming, the Institute has grown to be the largest meeting of estate planning professionals in the country, with a record number of over 2,500 individuals from around the nation in attendance last year. As our regular attendees know, this concentration of talent has led the Institute to have some of the better characteristics of a national convention of estate planners. The weeklong program provides the opportunity to exchange ideas, to network, and to review the latest in technology, products, and services displayed by over 100 vendors in an exhibit hall dedicated entirely to the estate planning industry. We invite those of you who have never attended our program, or who have been absent in recent years, to join us in Miami Beach January 8 - 12, 2001, to take advantage of this unique event.

THE INSTITUTE FACULTY:

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Atlanta, Georgia

Howard M. Zaritsky, Esq.
Rapidan, Virginia

THE PROGRAM SCHEDULE:

Sunday, January 7

12:00 6:00 p.m.

Registration

Monday, January 8

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

Registration

8:00 9:00 a.m.

Complimentary Continental Breakfast

9:00 10:30 a.m. /

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

OPTIONAL PRE-CONFERENCE FUNDAMENTALS PROGRAM
The Fundamentals of Estate Planning for Qualified Retirement Plan Benefits and IRAs: What to Do in Real Life.

Natalie B. Choate

10:30 10:45 a.m.

Break

2:00 2:10 p.m.

Introductory Remarks

Tina Hestrom Portuondo,

Institute Director

2:10 3:30 p.m.

Recent Developments in Estate, Gift and Income Taxation 2000 - Part One.

Jonathan G. Blattmachr

Carlyn S. McCaffrey

Pam H. Schneider

Materials by Richard B. Covey

3:30 3:45 p.m.

Break

3:45 5:15 p.m

Recent Developments in Estate, Gift and Income Taxation 2000 - Part Two.

6:00 7:00 p.m.

Complimentary Reception for Registrants

Tuesday, January 9

8:00 9:00 a.m.

Complimentary Continental Breakfast

9:00 10:30 a.m.

Question & Answer

Jonathan G. Blattmachr

Carlyn S. McCaffrey

Frances Schafer

Pam H. Schneider

10:30 10:45 a.m.

Break

10:45 11:30 a.m.

Now That You Have Me Here, What Are We Going to Do? Meritorious and Occasionally Meretricious Planning for an Existing FLP.

Milford B. Hatcher

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

How to Tie a Tight Knot with Marital Agreements.

Dennis I. Belcher

12:15 2:00 p.m.

Lunch Break

2:00 2:45 p.m.

The Pre-Owned IRA: Its Service Record, the Limited Warranty, and Your Possibilities for Resale.

Mark B. Edwards

2:45 3:30 p.m.

Client Capacity, Estate Planning and Malpractice Traps (Representing the Mentally Impaired Client).

James V. Quillinan

John Becker

3:30 3:45 p.m.

Break

3:45 4:30 p.m.

Planning Issues and Opportunities Impacting Entrepreneurs.

Jeff J. Saccacio

4:30 5:15 p.m.

College Funding: New Kid on the Block (Qualified State Tuition Plan) Challenges Traditional Techniques (Crummey Trusts and Minor Trusts). And the Winner is…Beverly R. Budin

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Wednesday, January 10

8:00 9:00 a.m.

Complimentary Continental Breakfast

9:00 9:45 a.m.

Flexibility or Contortion—Telling the Difference and Using One to Avoid the Other.

Ronald D. Aucutt

9:45 10:30 a.m.

Old but Not Cold: Changing Grandfathered Generation-Skipping Trusts.

Carol A. Harrington

10:30 10:45 a.m.

Break

10:45 11:30 a.m.

How to Greet New Uniform Trust and Estate Acts?: With Rational Exuberance.

Judith W. McCue

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

Perils of Prosperity: What Goes Up Will Likely Result in Surcharge.

Dominic J. Campisi

12:15 2:00 p.m.

Lunch Break

2:00 3:30 p.m. /

3:45 5:15 p.m.

FUNDAMENTALS PROGRAM
GRATs, GRUTs and QPRTs (and Competing Techniques for Large Intrafamily Transfers).

(Runs concurrently with the Special Sessions.)

Howard M. Zaritsky

2:00 3:30 p.m.

Special Sessions I

I-A CASE STUDY The Conduct of Gift and Estate Tax Audits Involving Family Limited Partnerships.

John W. Porter

John A. Wallace

James L. Gulley

I-B Drafting to Avoid the Shoals and Survive the Storms on the Long Cruise of a Twenty-First Century Estate Plan.

Ronald D. Aucutt

Frederick R. Keydel

Bruce Stone

I-C Representing the Mentally Impaired Client.

James V. Quillinan

John Becker

I-D Fiduciary Investment Liability.

Dominic Campisi

I-E Saving for College.

Beverly R. Budin

3:30 3:45 p.m.

Break

3:45 5:15 p.m.

Special Sessions II

II-A CASE STUDY Planning Issues and Opportunities Impacting Entrepreneurs.

Jeff J. Saccacio

II-B 2001: A Tech Odyssey.

Joseph G. Hodges, Jr.

Julia B. Fisher

You are invited to complete the Odyssey Survey that is located at

http://members.iex.net/~jghodges/miami2001.html before 1/1/00.

II-C Practical Ethics: Real Time

Solutions to Real Problems

John R. Price

J. Donald Cairns

Joseph G. Gorman, Jr.

II-D Planning for Existing FLPs

Milford B. Hatcher, Jr.

II-E Grandfathered

Generation-Skipping Trusts

Carol A. Harrington

Thursday, January 11

8:00 9:00 a.m.

Complimentary Continental Breakfast

9:00 9:45 a.m.

Marital Deduction and

Generation-Skipping Formula Clauses:

How to Get More Bang for Your Buck.

D. Keith Bilter

9:45 10:30 a.m.

That Which You Did Not Wish to Learn - Practical Aspects of QFOBIs.

Stephen E. Martin

10:30 10:45 a.m.

Break

10:45 11:30 a.m.

Funding Marital Deduction (and other) Bequests: Only the Questions Are Still the Same.

Jeffrey N. Pennell

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

The Family Foundation: An Owner's Manual.

Kathryn W. Miree

12:15 p.m. 2:00 p.m.

Lunch Break

2:00 3:30 p.m.

3:45 5:15 p.m.

FUNDAMENTALS PROGRAM
Income Tax Principles Applicable to the Formation, Operation and Termination of Family Limited Partnerships.

(Runs concurrently with the Special Sessions.)

Charles R. Levun

2:00 3:30 p.m.

Special Sessions III

III-A CASE STUDY Now That I Have Built It, How Do I Get Rid of It: Estate Planning for the Owners of the Closely Held Business.

Mark B. Edwards

III-B What's New in Life Insurance?

Offshore and Domestic Private

Placement; Creative Split Dollar Funding.

Leslie C. Giordani

Lawrence Brody

Charles L. Ratner

III-C After the Ink Dries: Guiding Your Clients through Family Foundation Management.

Kathryn W. Miree

Jerry J. McCoy

III-D Planning and Drafting Enforceable

Marital Agreements.

Brenda M. Abrams

Dennis I. Belcher

Howard M. Zaritsky

III-E Formula Clauses

D. Keith Bilter

3:30 3:45 p.m.

Break

3:45 5:15 p.m.

Special Sessions IV

IV-A CASE STUDY Inbound U.S. Tax Planning: Choosing the Best Investment Structures.

Robert F. Hudson, Jr.

IV-B 2001: A Tech Odyssey (Repeat of Session II-B).

Joseph G. Hodges, Jr.

Julia B. Fisher

IV-C The Parable of the Conflicted Clients: A Morality Play in Five Acts.

Susan T. House

Bruce Stone

Cast Members: Stephen A. Lynch III,

Alfred J. Olsen, Hanson S. Reynolds,

Barbara A. Sloan, Susan K. Smith, Diana

S. C. Zeydel

IV-D Funding

Jeffrey N. Pennell

IV-E QFOBIs

Stephen E. Martin

Friday, January 12

8:00 9:00 a.m.

Complimentary Continental Breakfast

9:00 9:45 a.m.

Protecting the Estate from In-laws and Other Predators.

Gideon Rothschild

9:45 10:30 a.m.

Ethics at the Edge: Sophisticated Estate Planning and Professional Responsibility.

Roy M. Adams

10:30 10:45 a.m.

Break

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

Question & Answer II.

Alan D. Bonapart

Judith W. McCue

Susan Porter

Edward S. Schlesinger

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