Federal Tax Conference

In October the School sponsored the Ninth Annual Federal Tax Conference. A three-day meeting, the Conference attracted an audience of more than four hundred, composed of lawyers, accountants, and corporate officials from all over the United States.

Again this year, the Conference was planned by a committee composed of Chicago lawyers and accountants, with Professor Walter Blum and Assistant Dean James M. Ratcliffe representing The Law School. Members of the Committee were as follows: WILLIAM N. HADDEAD, Chairman, Bell, Boyd, Marshall and Lloyd WALTER J. BLUM, Professor of Law, University of Chicago Law School FREDERICK O. DICUS, Chapman and Cuter, Chicago WILLIAM M. EMERY, McDermott, Will and Emery, Chicago JAMES M. HEAD, Winston, Straw, Smith and Patterson PAUL F. JOHNSON, Ernst and Ernst, Chicago ROBERT R. JORGENSEN, Sears, Roebuck and Company, Chicago WILLIAM A. MCMISWAIN, Eckart, Klein, McSwain and Campbell, Chicago JAMES M. RATCLIFFE, Assistant Dean, University of Chicago Law School

The program of the Conference was as follows:

"Address of Welcome"; GLEN A. LLOYD, Chairman, Board of Trustees, University of Chicago

"Maintaining an Effective Internal Revenue Service"; HON. RUSSELL C. HARRINGTON, United States Commissioner of Internal Revenue, Washington, D.C.

"Current Issues in the Use of Tax-exempt Organizations"; NORMAN A. SUGARMAN, Baker, Hostel and Patterson, Cleveland

Panel Discussion of Mr. Sugarman's Paper: PAUL F. JOHNSON, Ernst and Ernst, Chicago; MIDDLETON MILLER, Sidney, Austin, Burgess and Smith, Chicago; HARRY N. WYATT, D'ARBONA, Pfauhn, Wyatt and Rükind, Chicago


"Some Highlights of Recent Tax Regulations Affecting Trusts and Estates"; JAMES P. JOHNSON, Bell, Boyd, Marshall and Lloyd, Chicago


"Tax Consequences of Thin Incorporations"; BORIS I. BITTKER, Professor of Law, Yale Law School


Panel Discussion of Bittker's and Axelrad's Papers: CHARLES W. DAVIS, Hopkins, Sutter, Owen, Mulroy and Wentz, Chicago; WILLIAM M. EMERY, McDermott, Will and Emery, Chicago; ROBERT F. GRAHAM, Gardner, Carton, Douglas, Roemer and Childs, Chicago

"Business Purchase Agreements"; A Round-Table Discussion: LEONARD M. RUSSER, Moderator, Sommerschein, Berkson, Lautman, Levinson and Morse; WALTER J. BLUM, Professor of Law, University of Chicago Law School; MAX E. MEYER, Lord, Bissell and Brook, Chicago; MICHAEL J. SPORRER, Arthur Andersen and Company, Chicago; HUBERT L. WILL, Nelson, Boodell and Will, Chicago

"Recent Developments in the Taxation of Executive Compensation"; LESLIE MILLS, Price, Waterhouse and Company, New York

"Some Subchapter C Trouble Spots—after Two Years"; GEORGE STINSON, Cleary, Gottlieb, Friendly and Hamilton, New York

"United States Income Taxes on Foreign Business Income"; ROBERT W. WALES, Standard-Vacuum Oil Company, White Plains, N.Y.

Panel Discussion of Mr. Wales's Paper: DWIGHT HIGHTOWER, Baker, McKenzie and Hightower, Chicago; ROBERT R. JORGENSEN, Sears, Roebuck and Company, Chicago; FREDERICK R. SHEARE, Mayer, Friedlich, Spiess, Tierney, Brown and Platt

"The Penalty Surtax on Unreasonable Corporate Accumulations: A Mock Trial"

Presiding Judge: THE HONORABLE ALLIN H. PERCH, Judge of the Tax Court of the United States, Washington, D.C.

Taxpayer Counsel: FRANCIS H. URBELL, Pope and Ballard, Chicago

Governmental Counsel: ABRAHAM J. FRIEDMAN, Assistant Regional Counsel, United States Internal Revenue Service, Detroit

Ronald Tonidandel, winner of the Joseph Henry Beale Prize, awarded annually to the first-year student whose work in the first-year tutorial program is judged most worthy of special recognition. Mr. Tonidandel is from Stafford Springs, Connecticut, and received the A.B. degree from Amherst College.
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"Tax Advantages and Pitfalls in Collapsible Corporations and Partnerships": IRVING I. AXELRAD, Mitchell, Silberberg and Knupp, Los Angeles

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