

TEXAS AUSTIN

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Education: University of Texas School of Law (J.D., with honors, 1972); University of Texas at Austin (B.B.A. Accounting, with honors, 1969)

Career: Ms. Beckett's practice covers a broad range of disciplines relating to the corporate and tax aspects of structuring business entities. She specializes in the federal and international tax aspects of using alternative structures for the ownership of business and investment property, with particular emphasis on the use of partnerships and other passthrough entities such as trusts and family limited partnerships. In this regard, she advises clients regarding the tax considerations involved in the purchase and sale of real estate and the use of like kind exchanges and other complex arrangements relating to real estate structure and tax issues. Ms. Beckett deals frequently with IRS examining agents and appeals officers in administrative hearings relating to tax matters.

Affiliations:

- American Bar Association - Taxation Section (1987-1995)
- State Bar of Texas
- State Bar of New York
- Texas Society of CPAs and AICPA - Taxation Section
- Past Chair, Austin Accountants Breakfast Forum
- Past Chair, Austin Tax Study Group

Honors: Texas Super Lawyer (2004 & 2005), *Texas Monthly* and *Law & Politics* Magazines

Books: Co-Author, *Federal Tax Aspects of Cancellation of Indebtedness and Foreclosure*, Shepard's/McGraw-Hill (1993)

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TEXAS DALLAS

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Areas of Practice: Civil and Criminal Tax Litigation, White Collar Criminal Defense, Securities and Commercial Litigation

Education: J.D., Southern Methodist University, 1958; B.A., Southern Methodist University

Career: One of the best-known federal trial practitioners, Mr. Davis' practice is focused on federal tax litigation, defense of alleged business crimes, and related civil matters, including tax and securities controversies. As deputy assistant attorney in the Tax Division of the U. S. Department of Justice, Mr. Davis directed the Criminal Section and the Review Section (responsible for the evaluation of large civil tax case settlements sent to Congress for review) and the Criminal Section. Mr. Davis has testified before congressional committees at their request on two occasions, most recently to the Senate Finance Committee in connection with federal tax compliance and enforcement policy. He has also testified as an expert witness in U. S. District Court at the request of the Department of Justice explaining federal policies regarding grants of formal and informal immunity from prosecution in tax cases.

Affiliations: Dallas Bar Association (president, 1980; chairman of the board, 1977; chairman, Section of Taxation, 1976); State Bar of Texas (director 1981-82; chairman, Section of Taxation, 1976-1977); Fellow, American College of Tax Counsel (1983 to present).

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Areas of Practice: Trusts and Estates, Foundations, Probate Litigation

Education: J.D., *cum laude*, Harvard University, 1976; B.A., *cum laude*, Rice University, 1973

Career: Ms. Henkel assists clients in all aspects of sophisticated estate planning, administration of estates, settlement of complex estate matters, marital property issues, income taxation of trusts, charitable foundations, and settlement and litigation of disputes regarding wills and trusts. She is certified in Estate Planning and Probate Law by the Texas Board of Legal Specialization, and is the author of a treatise on estate planning, *Estate Planning and Wealth Preservation: Strategies and Solutions*, published by Warren, Gorham and Lamont (1997), and updated semi-annually.

Affiliations: American Bar Association (Committee member, Section of Real Property, Probate and Trust Law; Past Chair, Estate and Gift Tax Committee, Section of Taxation), State Bar of Texas (Past Chair, Section of Taxation), Fellow, American College of Trust and Estate Counsel.

Community Involvement: Advisory Council Member, Communities Foundation of Texas, Inc.; Leadership Council, Planned Giving Advisory Committee, Children's Medical Center of Dallas; Life Fellow, Texas Bar Foundation.

Recognitions: Best Lawyers in Dallas, Trusts and Estates Law, *D Magazine*, 2003, 2005; Texas SuperLawyer, *Law & Politics Magazine* and *Texas Monthly*, 2003, 2004; Who's Who in America; Who's Who in American Law.

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