



NEW YORK UNIVERSITY  
SCHOOL OF CONTINUING  
AND PROFESSIONAL STUDIES

3<sup>rd</sup> Annual  
Tax Controversy  
Forum



June 10, 2011  
The Crowne Plaza  
Times Square Manhattan  
New York, NY

Conference Chairs

Bryan C. Skarlatos, Esq., *partner,*  
*Kostelanetz & Fink, LLP, New York, NY*

Pamela F. Olson, Esq., *partner,*  
*Skadden, Arps, Slate, Meagher & Flom LLP,*  
*Washington, DC*

DIVISION OF PROGRAMS IN BUSINESS

DEPARTMENT OF ACCOUNTING, TAXATION, AND LEGAL PROGRAMS

# 3rd Annual Tax Controversy Forum

JUNE 10, 2011, THE CROWNE PLAZA TIMES SQUARE MANHATTAN

*Co-Chairs:* **Bryan C. Skarlatos, Esq.**, *partner, Kostelanetz & Fink, LLP, New York, NY*  
**Pamela F. Olson, Esq.**, *partner, Skadden, Arps, Slate, Meagher & Flom LLP, Washington, DC*

## LEARNING OBJECTIVES

New York University School of Continuing and Professional Studies is pleased to present the 3rd Annual Tax Controversy Forum. The NYU Tax Controversy Forum brings together representatives from the government and expert private practitioners to compare perspectives on a broad range of topics involving federal tax audits, appeals, and litigation. Coverage encompasses the entire scope of controversy work, from anticipating and planning for the examination of a return through resolution of unagreed issues. A panoply of senior government representatives discuss current audit and enforcement priorities. A panel of expert tax litigators and a U.S. Tax Court judge address when a case should be settled or taken to Tax Court. Another panel analyzes and suggests changes in the current IRS voluntary disclosure policy. Other distinguished practitioners from both the private and public sectors outline strategies for handling IRS audits and appeals conferences as well as tax collection activity and assertions of privilege.

Enforcement is an essential part of our federal tax system. The Tax Controversy Forum is an opportunity to stay current on new developments as well as to exchange ideas and share practice tips, which can contribute to better functioning of the system. Participants qualify for CPE and CLE credits. As a premier educational institution, NYU is committed to providing the highest standard of professional enrichment.

## WHO SHOULD ATTEND?

Tax professionals at all levels who prepare for or handle audits, appeals or tax litigation, as well as those involved in planning and transactional work who could benefit from a better understanding of the implications of their work for audit defense.

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Atlanta Office, Moore Stephens Tiller, LLC, Atlanta, GA*

**Christopher S. Rizek, Esq.**, *member, Caplin & Drysdale,  
Chartered, Washington, DC*

**Martin A. Schainbaum, Esq.**, *principal, Martin A.  
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# Friday, June 10, 2011

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7.30 a.m.      **Registration and Distribution of Materials  
Continental Breakfast**

8.15 a.m.      **OPENING REMARKS**

8.30 a.m.      **IRS AUDIT AND ENFORCEMENT:  
WHAT'S HAPPENING NOW**

In today's economic and political environment, enforcement of tax laws and collection of taxes are an important priority. The Internal Revenue Service is focusing on enforcement like never before. It has reorganized itself and developed new strategies to ensure that all taxpayers report and pay the appropriate amount of tax. Hear from senior people in the Small Business/Self-Employed and the Large Business and International Divisions of the Internal Revenue Service about their current priorities and programs.

**Moderator: Fred F. Murray, Esq.,** *executive director, tax, Grant Thornton LLP, Washington, DC*

**Cyndi B. Lafuente, Esq.,** *senior advisor to the deputy commissioner (international), Large Business and International Division, Internal Revenue Service, Washington, DC*

**Faris R. Fink, Esq.,** *deputy commissioner, Small Business/Self-Employed Division, Internal Revenue Service, Washington, DC*

**Rosemary Sereti,** *director, international individual compliance, Large Business and International Division, Internal Revenue Service, New York, NY*

9.30 a.m.      **LITIGATE OR SETTLE: EVALUATING THE MERITS  
OF YOUR CLIENT'S CASE**

Settlement discussions have broken down because the other side has unrealistically assessed the strengths and weaknesses of the case. Or is it your assessment that is unrealistic? What are the facts and how will you prove them? Will your theory of the case appeal to the judge? Do government and private sector lawyers make the same evaluations? How can the court help in trying to reach a settlement? A panel of seasoned courtroom participants discusses what you should consider before advising your client not to take that offer.

**Moderator: B. John Williams, Jr., Esq.,** *partner, Skadden, Arps, Slate, Meagher & Flom LLP, Washington, DC*

**James S. Halpern,** *judge, United States Tax Court, Washington, DC*

**Roland Barral, Esq.,** *area counsel, financial services, Office of Chief Counsel, Large Business and International Division, Internal Revenue Service, New York, NY*

**Kevin M. Flynn, Esq.,** *partner, Kostelanetz & Fink, LLP, New York, NY*

10.30 a.m.      **Refreshment Break**

10.45 a.m.

## **VOLUNTARY DISCLOSURES: PAST, PRESENT, AND FUTURE**

Voluntary disclosures are an important element of tax enforcement. This panel discusses the current state of the IRS Voluntary Disclosure Policy, including the offshore account initiative and voluntary disclosures for non-offshore account situations. It also addresses broader issues, including so called “quiet disclosures”, the role of the Examination function, the impact of civil penalties and longer-term policy issues relating to voluntary disclosures.

**Moderator: Scott D. Michel, Esq.,** *member, Caplin & Drysdale, Chartered, Washington, DC*

**Rick A. Raven,** *deputy chief, Criminal Investigation Division, Internal Revenue Service, Washington, DC*

**Mark E. Matthews, Esq.,** *partner, Morgan, Lewis & Bockius LLP, Washington, DC*

**Lawrence S. Horn, Esq.,** *partner, chair of the business crimes and tax litigation practice groups, Sills Cummis & Gross P.C., Newark, NJ*

**John C. McDougal, Esq.,** *special trial attorney, Office of Chief Counsel, Small Business/Self-Employed Division, Internal Revenue Service, Washington, DC*

11.45 a.m.

## **LUNCHEON KEYNOTE ADDRESS: TAX ADMINISTRATION PRIORITIES FROM THE OFFICE OF CHIEF COUNSEL**

The Chief Counsel addresses the day’s high profile topics in tax enforcement and tax administration.

**William J. Wilkins, Esq.,** *chief counsel, Internal Revenue Service; assistant general counsel, U.S. Department of the Treasury, Washington, DC*

12.30–

## **LUNCHEON**

1.30 p.m.

Buffet lunch served.

1.30–

## **BREAK OUT SESSIONS**

2.30 p.m.

## **TRACK I**

1.30 p.m.

## **IRS EXAMINATION AND APPEALS UNDER THE NEWLY RESTRUCTURED LARGE BUSINESS AND INTERNATIONAL DIVISION**

On October 1, 2010, LMSB “stood up” as LB&I, further establishing the keen IRS focus on international issues. This panel reviews the structure of the new division and some of its initiatives. It considers the impact of the restructuring on exam, appeals and the resolution process. How has the creation of a separate transfer pricing segment affected the transfer pricing exam? What is the role of the new international appeals specialist and what does that mean for the traditional appeals resolution process? We consider these questions and more.

**Moderator: Sharon Katz-Pearlman, Esq.,** *national principal-in-charge, tax controversy services, KPMG LLP, New York, NY*

**Roland Barral, Esq.,** *area counsel, financial services, Office of Chief Counsel, Large Business and International Division, Internal Revenue Service, New York, NY*

**Ken C. Jones, Esq.,** *of counsel, Sutherland Asbill & Brennan LLP, Washington, DC*

**Jolanta Sander,** *director of field operations, financial services, Office of Chief Counsel, Large Business and International Division, Internal Revenue Service, New York, NY*

**The New Incoming National Director of Appeals,** *Internal Revenue Service, Washington, DC*

## TRACK II

1.30 p.m.

### THE TRUTH ABOUT IRS COLLECTION ALTERNATIVES: WHAT WORKS AND WHAT DOESN'T

Tax collection work is no longer the province of the Low Income Tax Clinics and the midnight infomercial. Entertainers, athletes, and public companies should know the collection alternatives available to balance the government's need to collect tax against the hardship that immediate enforced collection could cause the taxpayer. Additionally, the IRS is now aggressively pursuing transferees when the taxpayer cannot pay the tax. This experienced panel of practitioners updates you on current developments, including offers in compromise, and provides tips on how to deal with the collection division of the IRS.

**Moderator: Frank Agostino, Esq.,** *president, Agostino & Associates, P.C., Hackensack, NJ*

**Mario Tevis,** *settlement officer, Appeals Division, Internal Revenue Service, Newark, NJ*

**Caroline D. Ciraolo, Esq.,** *partner, Rosenberg Martin Greenberg LLP, Baltimore, MD*

**Matthew Magnone, Esq.,** *senior manager, tax controversy and risk management services, Ernst & Young LLP, New York, NY*

**E. Martin Davidoff, CPA, Esq.,** *owner, E. Martin Davidoff & Associates, Dayton, NJ*

2.30–

3.30 p.m.

### BREAK OUT SESSIONS

## TRACK I

2.30 p.m.

### PLAN FOR THE EXAM: HOW TO HANDLE A LARGE CASE AUDIT

The IRS is increasingly focusing on global issues and enforcement. This panel presents the most current views of the IRS, corporate tax counsel, and practitioners on preparing for and addressing global issues in large case examinations. The discussion also includes current and developing programs and practices such as CAP and pre-filing agreements.

**Moderator: Kathryn Keneally, Esq.,** *partner, Fulbright & Jaworski L.L.P., New York, NY*

**Kathy J. Robbins,** *director, international business compliance, Large Business and International Division, Internal Revenue Service, Washington, DC*

**Nancy Chassman, Esq.,** *deputy director, global tax risk, American International Group, Inc., New York, NY*

**Howard J. Berman, Esq.,** *director, IRS tax controversy practice, Deloitte Tax LLP, New York, NY*

**Frank Y. Ng,** *executive director, Ernst & Young LLP, Washington, DC*





## TRACK II

2.30 p.m.

### **WHEN CAN I TALK TO MY ACCOUNTANT?: EXPLORING THE SCOPE OF THE KOVEL PRIVILEGE**

The tax practitioner, attorney/client and Kovel privileges are not as broad as many believe. Recent court decisions have narrowly construed the elements of these privileges to expose sensitive communications to discovery. This panel discusses these decisions as well as the boundaries of the privileges and offers practical tips to help protect privileged communications.

**Moderator: Ian M. Comisky, Esq.,** *partner, Blank Rome LLP, Philadelphia, PA*

**Deborah A. Butler, Esq.,** *associate chief counsel, procedure and administration, Office of Chief Counsel, Internal Revenue Service, Washington, DC*

**Ellis L. Reemer, Esq.,** *partner, DLA Piper LLP (US), New York, NY*

**Diana L. Wollman, Esq.,** *partner, Sullivan & Cromwell LLP, New York, NY*

**Jeffrey A. Neiman, Esq.,** *partner, Law Offices of Jeffrey A. Neiman, Fort Lauderdale, FL*

3.30 p.m.

### **Refreshment Break**

3.45 p.m.

### **ENFORCEMENT AND TAX PRACTITIONERS: A DISCUSSION WITH THE DIRECTOR OF THE OFFICE OF PROFESSIONAL RESPONSIBILITY**

Practitioners play an important role in the administration of the federal tax system. The IRS Office of Professional Responsibility is charged with regulating practitioner conduct. Hear from the director of the Office of Professional Responsibility about where the office intends to focus its attention in the coming year and how tax practitioners may be affected.

**Moderator: Barbara T. Kaplan, Esq.,** *shareholder, Greenberg Traurig LLP, New York, NY*

**Karen L. Hawkins, Esq.,** *director, Internal Revenue Service Office of Professional Responsibility, Washington, DC*

4.45 p.m.

### **Conference Concludes**



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## CONFERENCE FEE

The conference fee of \$495 includes tuition, continental breakfast, lunch, refreshment breaks, and all written materials. If you are a full-time government official, the fee is \$295. You must provide proof of full-time government employment with registration. Full and partial scholarships based on financial need are available as well. To request an application, please call (212) 992-3320, fax (212) 992-3650, or e-mail your request to [scps.atl@nyu.edu](mailto:scps.atl@nyu.edu).

## ELECTRONIC REGISTRATION CONFIRMATION

Confirmation of registrations submitted online, by mail, or fax is via e-mail. Please use an individual e-mail address for each registrant. If a confirmation is not received within one week of online registration submission (allow 2–3 weeks for registrations sent by mail/fax), please contact your firm's IT firewall administrator or e-mail [scps.atl@nyu.edu](mailto:scps.atl@nyu.edu) to request a duplicate copy.

## CONFERENCE LOCATION AND HOTEL ACCOMMODATIONS

The Crowne Plaza Times Square Manhattan is located at 1605 Broadway and 49th Street. Hotel accommodations also are available at The Crowne Plaza, which is easily accessible to Times Square, Broadway theaters, Radio City Music Hall, Carnegie Hall, Rockefeller Center, Central Park, and Fifth Avenue shopping. Single or double occupancy rooms are available at the NYU group rate of \$299 by calling (888) 233-9527 and referring to the NYU Tax Forum. Book your reservation in advance. Hotel rooms can sell out prior to cut-off date. These rooms will be held as a block, unless exhausted, until May 16, at which time they will be released to the general public.

## BADGE AND MATERIAL PICK-UP

The NYU Registration Desk will open and materials will be available beginning at 7.30 a.m. on Friday, June 10.

## CANCELLATION AND SUBSTITUTION POLICY

A written request for cancellation must be faxed to (212) 992-3650 or e-mailed to [scps.atl@nyu.edu](mailto:scps.atl@nyu.edu) to the attention of: Conference Administration. Requests received by May 27 will receive a 100% tuition refund less a \$100 cancellation fee. Due to financial obligations incurred by NYU, there are no refunds available after May 27. If you cannot attend but would like to send a substitute, please fax written notification to (212) 992-3650 or e-mail [scps.atl@nyu.edu](mailto:scps.atl@nyu.edu) no later than June 3.

## SPECIAL NEEDS

Any participants having special needs, such as physical or dietary, are encouraged to e-mail [scps.atl@nyu.edu](mailto:scps.atl@nyu.edu) or call the Department of Accounting, Taxation, and Legal Programs at (212) 992-3320 **at least two weeks prior** to the conference start date to indicate their particular requirement.

## RECORDING DEVICES

The use of tape or digital recorders in meeting rooms is prohibited. Please switch off mobile phones, and e-mail devices upon entering the meeting room.

## SPONSORSHIP AND EXHIBIT OPPORTUNITIES

For information on becoming a Forum Sponsor or exhibiting at the conference, please contact Kathleen Costello at (212) 992-3320 or [kathleen.costello@nyu.edu](mailto:kathleen.costello@nyu.edu).

## PRESS BADGES

If your publication plans to cover the NYU 3rd Annual Tax Controversy Forum, please e-mail coverage and press credentials to [scps.press@nyu.edu](mailto:scps.press@nyu.edu).



## PARTICIPANT LIST

A participant list derived from information provided to NYU at the time of registration will be distributed to attendees at check-in. Early registration is vital to ensure inclusion on the participant list. To appear, your registration must be received and processed by NYU before close of business Tuesday, May 31. Please plan accordingly.

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The New York University School of Continuing and Professional Studies is a recognized leader in professional continuing education. The Division of Programs in Business's Department of Accounting, Taxation, and Legal Programs has been certified by the New York State Continuing Legal Education Board as an Accredited Provider of continuing legal education in the State of New York. This conference meets the educational requirements of many organizations and agencies with mandatory CLE/CPE filing requirements. We urge you to contact our office in advance **at least 30 days prior** to the conference start date at (212) 992-3320 to ensure the availability of credit for a specific MCLE state, as we cannot guarantee that credit will be applied for in all cases.

## ESTIMATED CONTINUING EDUCATION CREDITS

6.75 based on a 60-minute hour

8.0 based on a 50-minute hour

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## Tax Conference Preview

# 70th INSTITUTE ON FEDERAL TAXATION

October 23–28, 2011, The Grand Hyatt, New York, NY  
November 13–18, 2011, The Fairmont Hotel, San Francisco, CA

Co-Chairs:

**Jerald David August, Esq.**, *partner, Fox Rothschild LLP, Philadelphia, PA & West Palm Beach, FL &* **Andrew J. Dubroff, Esq.**, *director, mergers and acquisitions, Ernst & Young LLP, Washington, DC*

For hundreds of tax practitioners, the NYU Institute on Federal Taxation is the event of the year. The Institute is designed for the practitioner who must frequently anticipate and handle federal tax matters. It provides high-level updates, practical advice you can implement, and in-depth analysis of the latest trends and developments from leading experts. Participants return to work with a wealth of materials, plus the tools and strategies needed to help save their clients' tax dollars and provide them with better service. A six-day program encompassing all major areas of tax, including current developments; tax controversies; corporate tax; partnerships, LLCs, and real estate; trusts and estates; executive compensation and employee benefits; closely-held businesses; international tax; ethical transactions; and hot tax topics.

**For more information, visit [www.scps.nyu.edu/ift](http://www.scps.nyu.edu/ift)**

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Established in 1934, NYU-SCPS is one of NYU's several degree-granting schools and colleges, each with a unique academic profile. The reputation of NYU-SCPS arises from its place as the NYU home for study and applied research related to key knowledge-based industries where the New York region leads globally. This is manifest in the School's diverse graduate, undergraduate, and continuing education programs in fields such as Real Estate and Construction Management; Hospitality, Tourism, and Sports Management; Global Affairs; Philanthropy and Fundraising; Graphic Communications Media, Publishing, and Digital Arts; Human Capital Management, Marketing, and Public Relations; with complementary strengths in the Liberal and Allied Arts; Translation and Interpreting; Management and Information Technology; and Finance and Taxation. More than 100 distinguished full-time faculty members collaborate with an exceptional cadre of practitioner/adjunct faculty and lecturers to create vibrant professional and academic networks that attract some 4,800 degree-seeking students from around the globe. In addition, the School fulfills the recurrent continuing higher education needs of local and professional communities, as evidenced by 54,000 annual enrollments in individual courses, specialized certificate programs, conferences, workshops, seminars, and public events. The School's community is enriched by 24,000 degree-holding alumni worldwide, many of whom serve as mentors, guest speakers, and advisory board members.

# Registration Instructions

You may photocopy the Registration Form. Please submit a separate form or complete a separate online registration session for each registrant. Registrations will not be processed unless accompanied by a check or credit card information. To ensure the accuracy of your information, it is imperative that you type or print clearly.

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By Internet: You may register for the Individual option online using your credit card at [scps.nyu.edu/taxcontroversy](http://scps.nyu.edu/taxcontroversy). Please use one of the other registration methods to take advantage of the Full-Time Government Officials discount.

## OTHER REGISTRATION OPTIONS

**By Mail:** To register by mail, fill out the registration form below and return it with a credit card authorization or check payable to New York University, to: Tax Controversy Forum, 25 West 4th Street, Room 203, New York, NY 10012.

**By Fax:** You may fax your credit card registration to us 24 hours a day at (212) 995-4677.

For further information regarding administrative policies, such as complaints and refunds, or if you need help registering, please call our Conference Administrators at (212) 992-3320.

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**NEW YORK UNIVERSITY**

**School of Continuing and Professional Studies**

Tax Controversy Forum  
11 West 42nd Street, Suite 401B  
New York, New York 10036

## **3rd Annual Tax Controversy Forum**

**June 10, 2011**

**The Crowne Plaza**

**Times Square Manhattan  
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