



**NYU | SCPS**

# **6TH ANNUAL TAX CONTROVERSY FORUM**

**June 20, 2014**

**CROWNE PLAZA TIMES SQUARE MANHATTAN**  
NEW YORK, NY

**KEYNOTE ADDRESS:**

**William J. Wilkins, Esq.**, *Chief Counsel,  
Internal Revenue Service; Assistant General Counsel,  
U.S. Department of the Treasury, Washington, D.C.*

**CONFERENCE CHAIRS:**

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

**Sharon Katz-Pearlman, Esq.**, *National Principal-in-Charge,  
Tax Controversy Services, KPMG LLP, New York, NY;  
Global Head, Tax Dispute and Controversy,  
KPMG International*

**June 19, 2014**

**OPTIONAL EVENING SESSIONS ON:**

- *Litigating an Innocent Spouse Case*
- *Hot Tips for Handling Audits*

# 6TH ANNUAL TAX CONTROVERSY FORUM

JUNE 20, 2014

## CROWNE PLAZA TIMES SQUARE MANHATTAN NEW YORK, NY

### PROGRAM CO-CHAIRS:

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

**Sharon Katz-Pearlman, Esq.,** *National Principal-in-Charge,  
Tax Controversy Services, KPMG LLP, New York, NY;  
Global Head, Tax Dispute and Controversy, KPMG International*

### LEARNING OBJECTIVES

**New York University School of Continuing and Professional Studies (NYU-SCPS)** is pleased to present the 6th Annual Tax Controversy Forum. The Tax Controversy Forum brings together representatives from the government and expert private practitioners to compare perspectives on a variety of topics involving federal tax audits, appeals, and litigation. The Forum covers a wide range of controversy work, from procedural seminars to substantive programs, international issues, ethical problems, current enforcement initiatives sensitive audits, and civil and criminal tax penalties.

Enforcement is an essential part of our federal tax system. The Tax Controversy Forum is an opportunity to stay current on new developments, 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-SCPS is committed to providing the highest standard of professional enrichment.

### WHO SHOULD ATTEND?

Accountants, attorneys, in-house practitioners and 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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## NYU SCHOOL OF CONTINUING AND PROFESSIONAL STUDIES (NYU-SCPS)

**Dennis Di Lorenzo, B.A.,** *Dean*

**Rosemary A. Mathewson, J.D., LL.M.,** *Vice Dean, NYU-SCPS Global and Strategic Initiatives;  
Divisional Dean, Programs in Business*

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## DEPARTMENT OF FINANCE AND LAW PROGRAMS

**Julia N. Miller, J.D.,** *Director*

**Kathleen Costello, CMP,** *Assistant Director*

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## PLANNING COMMITTEE

### PLANNING COMMITTEE CHAIR

**Sidney Kess, CPA, J.D., LL.M.,** *Of Counsel, Kostelanetz & Fink, LLP, New York, NY*

### PLANNING COMMITTEE MEMBERS

**David D. Aughtry, Esq.,** *Shareholder, Chamberlain, Hrdlicka, White, Williams & Aughtry, Atlanta, GA*

**Jerald David August, Esq.,** *Partner, Fox Rothschild LLP, Philadelphia, PA & West Palm Beach, FL*

**Howard J. Berman, Esq.,** *Director, IRS Tax Controversy Practice, Deloitte Tax LLP, New York, NY*

**Megan L. Brackney, Esq.,** *Partner, Kostelanetz & Fink, LLP, New York, NY*

**Sandra R. Brown, Esq.,** *Assistant United States Attorney, Chief, Tax Division, The United States Attorney's Office, Central District of California, Los Angeles, CA*

**N. Jerold Cohen, Esq.,** *Partner, Sutherland Asbill & Brennan LLP, Atlanta, GA*

**Thomas A. Cullinan, Esq.,** *Partner, Sutherland Asbill & Brennan LLP, Atlanta, GA*

**Michael J. Desmond, Esq.,** *The Law Offices of Michael J. Desmond, APC, Washington, D.C.*

**Eli J. Dicker, Esq.,** *Executive Director, Tax Executives Institute, Inc., Washington, D.C.*

**Miriam L. Fisher, Esq.,** *Partner, Latham & Watkins LLP, Washington, D.C.*

**John Gamino, CPA, Esq.,** *Assistant Professor, McCoy College of Business Administration, Texas State University, Dallas, TX*

**Gersham Goldstein, Esq.,** *Stoel Rives LLP, Portland, OR*

**Armando Gomez, Esq.,** *Partner, Skadden, Arps, Slate, Meagher & Flom LLP, Washington, DC*

**Brian R. Harris, Esq.,** *Partner, Akerman LLP, Tampa, FL*

**Donald L. Korb, Esq.,** *Partner, Sullivan & Cromwell LLP, Washington, D.C.*

**David A. Lifson, CPA,** *Partner, Crowe Horwath LLP, New York, NY*

**Charles J. Muller, III, Esq.,** *Shareholder, Chamberlain, Hrdlicka, White, Williams & Aughtry, San Antonio, TX*

**Jeffrey A. Neiman, Esq.,** *Partner, Marcus Neiman Rashbaum LLP, Fort Lauderdale, FL*

**Pamela F. Olson, Esq.,** *Deputy Tax Leader and Washington Tax Services Practice Leader, PricewaterhouseCoopers LLP, Washington, D.C.*

**Christopher S. Rizek, Esq.,** *Member, Caplin & Drysdale, Chartered, Washington, D.C.*

**Martin A. Schainbaum, Esq.,** *Principal, Martin A. Schainbaum, P.L.C., San Francisco, CA*

**Steven R. Toscher, Esq.,** *Principal, Hochman, Salkin, Rettig, Toscher & Perez, P.C., Beverly Hills, CA*



# 6TH ANNUAL TAX CONTROVERSY FORUM

## SPONSORS

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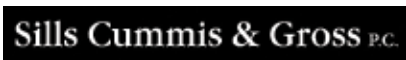
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**THURSDAY, JUNE 19, 2014**

## **OPTIONAL EVENING SESSION #1**

.....  
**4.30–5.30 P.M.**

### **LITIGATING AN INNOCENT SPOUSE CASE**

The innocent spouse rules are a powerful tool for avoiding liability that must be considered in many cases. The rules can be complex and failure to understand them can lead to missed opportunities. This program reviews the various types of innocent spouse relief as well as related issues such as ways to “undo” a joint return, when to file separate returns, the use of innocent spouse arguments in Collection Due Process hearings and tips for representing the non-requesting spouse.

**Frank Agostino, Esq.**, *President, Agostino & Associates, P.C., Hackensack, NJ*

**Monica E. Koch, Esq.**, *Associate Area Counsel, Small Business/Self-Employed Division, Internal Revenue Service, Westbury, NY*

## **OPTIONAL EVENING SESSION #2**

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**5.30–6.30 P.M.**

### **HOT TIPS FOR HANDLING AUDITS**

What are the most important things to consider when planning for an IRS audit? How do you handle aggressive revenue agents? What can you do when you realize that your client may have engaged in criminal behavior? Are there limits to what you have to tell the IRS? When do penalties come into play? How can you help generate a better outcome for your client? This program provides information and real-life examples that can't be found in any book!

**Charles P. Rettig, Esq.**, *Principal, Hochman, Salkin, Rettig, Toscher & Perez, P.C., Beverly Hills, CA*

*You must register separately for these workshops and the related CLE/CPE credits. A fee of \$149 for one workshop or \$249 to attend both workshops will be charged. Space is limited, so please register in advance.*



# 6TH ANNUAL TAX CONTROVERSY FORUM

FRIDAY, JUNE 20, 2014

8 A.M.

## REGISTRATION AND DISTRIBUTION OF MATERIALS CONTINENTAL BREAKFAST

8.30 A.M.

## OPENING REMARKS

8.40 A.M.

## TAX ENFORCEMENT: COMING ATTRACTIONS

Tax enforcement continues to take center stage as Treasury and the IRS focus on ensuring that taxpayers are fully compliant and pay the right amount of tax. This program provides a forum in which senior executives from the Department of Justice and IRS can discuss their priorities and enforcement strategies for the coming year.

**Moderator: Bryan C. Skarlatos, Esq.,** *Partner, Kostelanetz & Fink, LLP, New York, NY*

## DEPARTMENT OF JUSTICE UPDATE

**Kathryn Keneally, Esq.,** *Assistant Attorney General, Tax Division, U.S. Department of Justice, Washington, D.C. [Invited]*

**Larry A. Campagna, Esq.,** *Shareholder, Chamberlain, Hrdlicka, White, Williams & Aughtry, Houston, TX*

## IRS LARGE BUSINESS AND INTERNATIONAL DIVISION UPDATE

**Rosemary J. Sereti, CPA,** *Industry Director, Financial Services, Office of Chief Counsel, Large Business and International Division, Internal Revenue Service, New York, NY*

**Fred F. Murray, Esq.,** *Managing Director, Tax, Grant Thornton LLP, Washington, D.C.*

## IRS SMALL BUSINESS/SELF-EMPLOYED DIVISION UPDATE

**Frances F. Regan, Esq.,** *Area Counsel, Small Business/Self-Employed Division, Internal Revenue Service, New York, NY*

**Bryan I. Inoue,** *Director, North Atlantic Area, Small Business/Self-Employed Division, Examination, Internal Revenue Service, New York, NY*

**Josh O. Ungerman, Esq., CPA,** *Partner, Meadows, Collier, Reed, Cousins, Crouch & Ungerman, L.L.P., Dallas, TX*

10 A.M.

## LB&I - FOCUS ON INTERNATIONAL

As the world “goes global”, international tax issues take on a higher priority for both taxpayers and the Internal Revenue Service. Hear directly from the IRS’ senior executives as they discuss International’s key focus areas; the Advance Pricing and Mutual Agreement program, the new revenue procedure governing the Advance Pricing Agreement and Competent Authority process, information sharing, International Practice Networks, FATCA and other key issues that every tax practitioner should understand.

**Moderator: Sharon Katz-Pearlman, Esq.,** *National Principal-in-Charge, Tax Controversy Services, KPMG LLP, New York, NY; Global Head, Tax Dispute and Controversy, KPMG International*

**Diana L. Wollman, Esq.,** *Director, International Strategy, Large Business and International Division, Internal Revenue Service, Washington, D.C.*

**Samuel M. Maruca, Esq.,** *Director, Transfer Pricing Operations, Large Business and International Division, Internal Revenue Service, Washington, D.C.*



# CROWNE PLAZA TIMES SQUARE MANHATTAN

10.50 A.M.

## REFRESHMENT BREAK

11 A.M.

## GOOD PRACTITIONER/BAD PRACTITIONER: ETHICAL STANDARDS AND ISSUES IN FEDERAL TAX PRACTICE

Tax practitioners have a duty to their clients to guide them through the tax system and ensure that they don't pay more than their fair share of taxes. At the same time, practitioners have a duty to the system to avoid misleading the IRS and to help their clients pay the correct tax liability. Sometimes these duties come into conflict, creating sensitive and even career-threatening situations. This panel focuses on real life scenarios to highlight the ethical, civil and criminal penalty standards that apply to tax practitioners.

**Moderator: Caroline D. Ciraolo, Esq.,** *Partner, Rosenberg Martin Greenberg LLP, Baltimore, MD*

**Karen L. Hawkins, Esq.,** *Director, Internal Revenue Service Office of Professional Responsibility, Washington, D.C.*

**Charles P. Rettig, Esq.,** *Principal, Hochman, Salkin, Rettig, Toscher & Perez, P.C., Beverly Hills, CA*

**Sharon L. McCarthy, Esq.,** *Partner, Kostelanetz & Fink, LLP, New York, NY*

12 NOON

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

The IRS Chief Counsel addresses today'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, D.C.*

12.30-1.30 P.M.

## LUNCHEON BUFFET LUNCH SERVED

1.30-2.30 P.M.

## BREAK OUT SESSIONS

## TRACK I

### YOUR COMPANY PAID HOW MUCH TAX?? BEPS, THE OECD AND TAX MORALITY

Newspapers are full of stories about multi-national companies that pay strikingly low effective rates of tax. At the same time, revenue authorities from various countries continue to work together to ensure that taxpayers pay the "right" amount of tax in the right country. Recent developments at the OECD, the issuance of the Basis Erosion and Profit Shifting ("BEPS") report, country by country reporting and the new focus on tax morality and transparency mean additional considerations for taxpayers and their representatives. This panel explores this critical new development, and analyzes what it means for practitioners and their multinational clients.

**Moderator: J. Richard Harvey, Jr.,** *Distinguished Professor of Practice, Villanova University School of Law and Graduate Tax Program, Villanova, PA*

**Manal S. Corwin, Esq.,** *Principal-in-Charge, Washington National Tax, International Tax Policy, KPMG LLP, Washington, D.C.*

**George Pompertzki, Esq.,** *Vice President, Taxes, sanofi-aventis U.S. LLC, Bridgewater, NJ*

# 6TH ANNUAL TAX CONTROVERSY FORUM

## TRACK II

### TIPS FROM THE TRENCHES: LITIGATING A COLLECTION DUE PROCESS CASE

Taxpayers have powerful rights to contest the collection of tax. Those rights come with their own procedures and standards. One of the most important techniques for representing taxpayers who cannot pay is the Collection Due Process hearing. When and how should CDP hearings be demanded, what is the scope and standard of review and what relief can be obtained? This panel of expert practitioners walks you through the CDP process and provides useful tips to help you effectively represent your clients.

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

**Robert E. McKenzie, Esq.,** *Partner, Arnstein & Lehr LLP, Chicago, IL*

**Walter Pagano, CPA, CFE, CFF,** *Partner, Tax Controversy Practice Leader, Forensic Accountant and Litigation Consultant, EisnerAmper LLP, New York, NY*

**Kathleen M. Pakenham, Esq.,** *Partner, Cooley LLP, New York, NY*

**Christopher L. Bourell, Esq.,** *Attorney, Tenenbaum Law, P.C., Melville, NY*

2.30–3.30 P.M.

### BREAK OUT SESSIONS

## TRACK I

### THE NEW IDR INITIATIVE AND ITS IMPACT ON THE INFORMATION GATHERING PROCESS

The information gathering process is at the heart of an IRS exam. Recent changes in the way the IRS will use Information Document Requests have received a lot of attention from both agents and taxpayers. This session reviews the process, how it works, and what to expect.

**Moderator: Ken Jones, Esq.,** *Of Counsel, Sutherland Asbill & Brennan LLP, Washington, D.C.*

**Nancy Chassman, Esq.,** *Global Director of Tax Controversy, American International Group, Inc., London, UK*

**Rosemary J. Sereti, CPA,** *Industry Director, Financial Services, Office of Chief Counsel, Large Business and International Division, Internal Revenue Service, New York, NY*

**Laura L. Gavioli, Esq.,** *Dentons US LLP, Dallas, TX*

## TRACK II

### THE OFFSHORE VOLUNTARY DISCLOSURE PROGRAM: TO PARTICIPATE OR NOT PARTICIPATE, THAT IS THE QUESTION

More than 40,000 taxpayers have participated in the IRS' Offshore Voluntary Disclosure Program but there are many, many more taxpayers with unreported foreign assets seeking advice about their exposure and ways to address their reporting obligations. This program addresses questions about when a taxpayer should participate in the OVDP and alternatives to the OVDP, such as FAQ 17 and 18 filings and the streamlined procedures. The panelists also discuss when a taxpayer should consider opting out of the OVDP and how those opt-outs are being handled by the IRS.

**Moderator: Scott D. Michel, Esq.,** *Member, Caplin & Drysdale, Chartered, Washington, D.C.*

**Jennifer L. Best, Esq.,** *Senior Advisor, Deputy Commissioner (International), Internal Revenue Service, Washington, D.C.*

**John C. McDougal, Esq.,** *Special Trial Attorney, Office of Chief Counsel, Small Business/Self-Employed Division, Internal Revenue Service, Washington, D.C.*

**Richard J. Sapinski, Esq.,** *Partner, Sills Cummis & Gross P.C., Newark, NJ*

**Jeremy H. Temkin, Esq.,** *Principal, Morvillo Abramowitz Grand Iason & Anello P.C., New York, NY*



3.30 P.M.

REFRESHMENT BREAK

3.45–4.45 P.M.

BREAK OUT SESSIONS

## TRACK I

### WHO SAYS TAX PRACTITIONERS ARE BORING? CREATIVE APPROACHES TO RESOLVING YOUR ISSUES

In recent years, the IRS has developed a number of ways to resolve issues without resorting to litigation. These alternate dispute resolution methods can be effective and efficient ways of bringing a matter to conclusion, providing much desired certainty in an expeditious manner. Join this panel of practitioners for a lively discussion of the various options, and how to decide which option is best for your issue. Pre-filing agreements, mediation, arbitration and other approaches are discussed in practical case settings.

**Moderator: Patti Burquest, Esq.,** *Principal, Tax Controversy Services, McGladrey LLP, Washington, D.C.*

**B. John Williams, Jr., Esq.,** *Partner, Skadden, Arps, Slate, Meagher & Flom LLP, Washington, D.C.*

**Paul D. DeNard,** *Managing Director, PricewaterhouseCoopers LLP, New York, NY*

## TRACK II

### BUT THIS IS JUST A FISHING EXPEDITION! CONTESTING IRS SUMMONSES

The IRS' ability to obtain information from taxpayers is an essential component of tax enforcement. IRS requests for information are backed up by the IRS' ability to issue and enforce a summons. When faced with a demand for documents or testimony, taxpayers are often shocked by the breadth of the IRS' summons authority. Recent court decisions have addressed when the IRS may enforce a summons and when taxpayers can assert privileges. This panel addresses recent developments affecting the IRS' ability to demand information, when taxpayers are compelled to respond and what privileges can be asserted.

**Moderator: James R. Gadwood, Esq.,** *Associate, Sullivan & Cromwell LLP, New York, NY*

**Ian M. Comisky, Esq.,** *Partner, Blank Rome LLP, Philadelphia, PA*

**Martin R. Press, Esq.,** *Shareholder, Gunster, Yoakley & Stewart, P.A., Fort Lauderdale, FL*

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

**Roland Barral, Esq.,** *Senior Advisor, Skadden, Arps, Slate, Meagher & Flom LLP, New York, NY*

**Frank de Leon, Esq.,** *Assistant Chief, Civil Trial Section, Western Region, Tax Division, U.S. Department of Justice, Washington, D.C.*



# 6TH ANNUAL TAX CONTROVERSY FORUM

## SPECIAL SKILLS WORKSHOPS

2- 3 P.M.

### WORKSHOP I SCHEDULE C AUDIT HOT BUTTONS

Where does the IRS get the most money when auditing Schedule Cs? What are the red flags on a Schedule C? This program by a nationally recognized tax practitioner provides clues on how to prepare and defend a Schedule C and includes tips relating to new merchant credit card reporting requirements, substantiating business expenses, and new approaches to sensitive areas like the home office deduction.

**Claudia Hill, EA, MBA**, *President, TaxMam, Inc., Cupertino, CA*

3.10- 4.45 P.M.

### WORKSHOP II IRS OFFERS IN COMPROMISE: A CASE STUDY

This comprehensive workshop takes participants on a hands-on journey through the entire IRS Offer in Compromise process, including how to effectively complete the appropriate financial disclosure package for individuals. This program provides you with the skills that will enable you to compute Reasonable Collection Potential, determine acceptable installment agreements, ascertain whether a client qualifies for Currently Not Collectible Status and advise your clients regarding pre-submission planning.

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

4.45 P.M.

### CONFERENCE CONCLUDES





## UPCOMING CONFERENCES

### SUMMER INSTITUTE IN TAXATION

JULY 14-25, 2014

**THE WESTIN NEW YORK AT TIMES SQUARE**  
NEW YORK, NY

NYU-SCPS offers a series of intensive summer conferences designed for professionals who wish to obtain a solid foundation in a specialized area of law or tax practice. Eight individual conferences make up the Institute: Introduction to International Taxation, Advanced International Taxation, Introduction to State and Local Taxation, State and Local Taxation II, Introduction to Trusts and Estates, Wealth Planning, Introduction to Partnerships, and Introduction to Consolidated Returns. Lecturers for the program are nationally and internationally renowned practitioners. For more information, visit: [www.scps.nyu.edu/sumtax](http://www.scps.nyu.edu/sumtax).

### 73RD INSTITUTE ON FEDERAL TAXATION

OCTOBER 19-24, 2014

**GRAND HYATT NEW YORK**  
NEW YORK, NY

CO-CHAIRS

**Sanford J. Schlesinger, Esq.**, *Founding Partner, Schlesinger Gannon & Lazetera LLP, New York, NY*  
**William B. Sherman, Esq.**, *Partner, Holland & Knight LLP, Fort Lauderdale, FL*

NOVEMBER 16-21, 2014

**THE HOTEL DEL CORONADO**  
SAN DIEGO, CA

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. The Institute attracts attorneys, both general tax practitioners and specialists; accountants; corporate treasury and compliance executives; tax managers; and financial planners, seeking expert discussion of the latest technical, legislative, and planning developments. Just as important, the Institute provides the perfect setting to meet practitioners from around the country. It's an opportunity for you to share ideas, exchange views, learn what others are doing, and obtain credit for continuing education. For more information, visit [www.scps.nyu.edu/ift](http://www.scps.nyu.edu/ift).

### 33RD INSTITUTE ON STATE AND LOCAL TAXATION

DECEMBER 8-9, 2014

**GRAND HYATT NEW YORK**  
NEW YORK, NY

The Institute is designed for the practitioner who must frequently anticipate and handle state and local tax matters. It provides high-level updates, practical advice you can implement, and in-depth analysis of the latest developments and current issues in all areas of state and local taxation. Attendees learn practical solutions and gain valuable insights from leading authorities throughout the profession. Just as important, the Institute provides the perfect setting to meet practitioners from around the country. It's an opportunity to share ideas, exchange views, learn what others are doing, and obtain credit for continuing education. For more information, visit [www.scps.nyu.edu/salt](http://www.scps.nyu.edu/salt).



# 6TH ANNUAL TAX CONTROVERSY FORUM

## GENERAL INFORMATION

### CONFERENCE FEE

The conference fee of \$525 includes the one-day 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. You may register online, by mail or on-site at the conference. To register by mail, complete the registration form and return it with a check or money order. All registrations sent by mail must be received by 12.00 noon on Tuesday, June 17, 2014 (Eastern Standard Time). Full and partial waivers of the conference fee based upon financial need are available as well. To request an application, please call **(212) 992-3320**, fax **(212) 995-3653**, or e-mail your request to **scps.tax@nyu.edu**. Invited speakers are pre-registered.

To register on-site, you may pay by check, money order, or credit card. To pay by credit card, all walk-ins will be required to self-register at available kiosks. For faster service, conference attendees should plan to register in advance online at **scps.nyu.edu/taxcontroversy**. To register online for the full-time government official discount, please call **(212) 992-3320** or e-mail **scps.tax@nyu.edu** for a special discount code.

### OPTIONAL THURSDAY EVENING WORKSHOP FEES

You must register separately for one or both of the Thursday evening workshops and the related CLE/CPE credits. The fee to attend one of the evening session workshops is \$149. To attend both of the evening session workshops, the fee is \$249. We strongly advise you to register in advance as space is limited. Walk-in registrations for the Thursday evening session workshops cannot be guaranteed.

### PRESS BADGES

If your publication plans to cover the NYU-SCPS 6th Annual Tax Controversy Forum, please e-mail coverage and press credentials to **scps.press@nyu.edu**.

### ELECTRONIC REGISTRATION CONFIRMATION

An automated e-mail confirmation will be sent to the e-mail address provided to NYU-SCPS at the time of registration. Please use an individual e-mail address for each registrant. If a confirmation is not received within two days of online registration submission (allow one-two weeks for registrations sent by mail), e-mail **scps.tax@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. Accommodations also are available at the hotel, which is easily accessible to Times Square, Broadway theaters, Radio City Music Hall, Carnegie Hall, Rockefeller Center, Central Park, and Fifth Avenue shopping. To provide a quality Forum at the best possible cost NYU-SCPS has negotiated special room rates and has committed to a block of rooms at the Crowne Plaza. We ask you to support NYU-SCPS by reserving your sleeping accommodations within the room block. Your support allows us to keep our registration fees reasonable. Single or double occupancy rooms are available at the NYU-SCPS group rate of \$319 by calling **(888) 233-9527** and referring to the NYU-SCPS 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 22, at which time they will be released to the general public.

### CANCELLATION AND SUBSTITUTION POLICY

A written request for cancellation must be faxed to **(212) 995-3653** or e-mailed to **scps.tax@nyu.edu** to the attention of: Conference Administration. Requests received by June 5 will receive a 100% tuition refund less a \$100 cancellation fee. Due to financial obligations incurred by NYU-SCPS, there are no refunds available after June 5. We are not able to arrange cancellation exceptions or to accept on-site cancellations. If you cannot attend but would like to send someone in your place, please e-mail **scps.tax@nyu.edu** no later than June 17.

### SPECIAL NEEDS

Any participant who has special needs (physical or dietary), is encouraged to e-mail **scps.tax@nyu.edu** or call the Department of Finance and Law Programs at **(212) 992-3320** at least two weeks prior to the conference start date to indicate their particular requirement.

# CROWNE PLAZA TIMES SQUARE MANHATTAN

## CONFERENCE CHECK-IN AND COURSE MATERIALS PICK-UP

The NYU-SCPS Tax Controversy Forum Registration Desk will open, and materials will be available beginning at 8 a.m. on Friday, June 20. If you are attending one or both of the Thursday evening session workshops, a separate badge and materials will be available for pick up outside the workshop meeting room on Thursday, June 19 beginning at 4 p.m. Proper photo identification is required for badge retrieval. One set of conference materials per paid registrant is provided at time of badging. Badges must be displayed in all public spaces throughout the conference.

## 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).

## RECORDING DEVICES

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

## CONTINUING EDUCATION CREDIT

The NYU School of Continuing and Professional Studies (NYU-SCPS) is a recognized leader in professional continuing education. The NYU-SCPS Department of Finance and Law 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 at **(212) 992-3320** or at [scps.tax@nyu.edu](mailto:scps.tax@nyu.edu) **at least 30 days** prior to the conference start date 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

6.5 based upon a 60-minute hour, including 1.0 ethics credit

8.0 based upon a 50-minute hour, including 1.0 ethics credit

## THURSDAY EVENING WORKSHOP CREDITS

2.0 based upon a 60-minute hour

2.0 based upon a 50-minute hour

Except where indicated, CLE credits are non-transitional in the categories of professional practice/practice management. CLE boards define a credit hour as either 60 minutes or 50 minutes.

Recommended CPE credits are in the following NASBA Fields of Study: Taxes; Regulatory Ethics. In accordance with the Standards of the National Registry of CPE Sponsors, CPE credits are based upon a 50-minute hour. Please note that not all state boards accept half credits.

## NASBA



The NYU School of Continuing and Professional Studies Department of Finance and Law Programs is registered with the National Association of State Boards of Accountancy (NASBA), as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors through its website: [www.learningmarket.org](http://www.learningmarket.org).

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# 6TH ANNUAL TAX CONTROVERSY FORUM

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### ONLINE REGISTRATION

- Visit [scps.nyu.edu/taxcontroversy](http://scps.nyu.edu/taxcontroversy)
- Highly recommended for fastest response
- Automated e-mail confirmation will be sent to the e-mail address provided to NYU-SCPS at the time of registration
- Please use an individual e-mail address for each registrant
- Major credit cards accepted: American Express®, Discover®, MasterCard®, or Visa®

### OTHER REGISTRATION OPTIONS

**Mail:** To register by mail, complete the registration form, and return it with a check or money order made payable to **New York University**. Mail to the address below. Payment must accompany the registration form. An e-mail confirmation of registration will be sent to the e-mail address provided to NYU-SCPS. Fill out a separate form for each registration. Send to: NYU-SCPS Budget Office, New York University, 7 East 12th Street, 12th Floor, New York, NY 10003, Attention: 6th Annual Tax Controversy Forum. All registrations sent by mail must be received by 12 noon on Tuesday, June 17, 2014 (Eastern Standard Time).

**On-Site:** To register on-site, you may pay with check, money order, or credit card. To pay by credit card, all walk-ins will be required to self-register at available kiosks. For faster service, conference attendees should plan to register in advance online at [scps.nyu.edu/taxcontroversy](http://scps.nyu.edu/taxcontroversy).

To register on-site, visit the NYU-SCPS Registration Desk at the Crowne Plaza Times Square Manhattan beginning at 8 a.m. on Friday, June 20, 2014. To register online for the full-time government official discount, please call **(212) 992-3320** or e-mail [scps.tax@nyu.edu](mailto:scps.tax@nyu.edu) for a special discount code. We do not accept faxed registrations or wire transfers as a form of payment.

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### CHECK ONE FOR REGISTRATION AND PAYMENT:

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# 6TH ANNUAL TAX CONTROVERSY FORUM

**June 20, 2014**

**CROWNE PLAZA TIMES SQUARE MANHATTAN**  
NEW YORK, NY

## **UPDATES FROM**

**Karen L. Hawkins, Esq.**

*Director, IRS Office of Professional Responsibility*

**Kathryn Keneally, Esq.**

*Assistant Attorney General, Tax Division of DOJ [Invited]*

**Rosemary J. Sereti, CPA**

*Industry Director, Financial Services, Large Business and International Division of the IRS*

**Bryan I. Inoue**

*Director, North Atlantic Area, Small Business/  
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