UPCOMING EVENTS

SEPTEMBER

September 19-20, 2002
Mealey’s National Asbestos Litigation Conference
Location: The Westin Hotel, Philadelphia, PA
Speaker: Peter Van N. Lockwood
Mr. Lockwood will give an asbestos bankruptcy update.

September 19-20, 2002
Asbestos Litigation in the 21st Century
Location: LeMeridien, Chicago, IL
Speaker: Elihu Inselbuch
Mr. Inselbuch will give a presentation on “Bankruptcy: The View from the Trenches.”

September 23-25, 2002
2002 Fall Conference for Community Foundations
Location: Atlanta, GA
Speaker: Douglas Varley
Mr. Varley will speak at this conference.

September 26, 2002
Federal American Inn of Courts
Location: Washington, DC
Speaker: David Webster
Mr. Webster will speak at this meeting.

OCTOBER

October 16, 2002
Issues Affecting Religious Organizations in MD, VA, and DC
Location: Rockville, MD
Speakers: Marcus Owens and Lloyd Mayer
Messrs. Owens and Mayer will be speaking to clergy and board members from churches and synagogues, organizations run by religious orders and attorneys and accountants who advise these organizations.

October 24-26, 2002
Tax Treaties and the Taxation of Business Profits Seminar
Location: Harvard Law School, Cambridge, MA
Speaker: H. David Rosenbloom
Mr. Rosenbloom will speak at this seminar on the various aspects of the taxation of business profits under bilateral tax treaties.

October 31, 2002
Health Care Law and Litigation
Location: Washington, DC
Speaker: Scott Michel
Mr. Michel will speak on voluntary disclosures and eggshell audits.

For more information, please contact the Marketing Department at (202) 862-5000 or e-mail bcd@capdale.com.
September 3, 2002

“Judge Strikes Down Some Requirements for Disclosure by Section 527 Organizations”

*Daily Tax Report*

In the article, **Trevor Potter** explains that although parts of the law were struck down as unconstitutional, critical components of the law were upheld. Specifically, Mr. Potter was pleased that the Alabama judge agreed that the disclosure requirement could constitutionally be applied to 527 organizations whether they are engaged in express advocacy of certain candidates or only in “issue advocacy” in federal campaigns.

September 3, 2002

“Profile of Offshore Bank Customers Emerges in Latest U.S. IRS Filings”

*Worldwide Tax Daily*

**Christopher Rizek** comments on the significance of the IRS decision to issue summonses to 40 vendors who have sold products and services to customers using offshore credit cards. Mr. Rizek believes that this action signals a serious commitment by the IRS to crack down on people who use offshore bank accounts to evade paying taxes. *(This article also appeared in the September 2nd issue of Tax Notes and the August 30th issue of Tax Notes Today.)*

September, 2002

“Group Said to be Funding Terrorists Listed as Public Charity by IRS”

*The Exempt Organization Tax Review*

In this article, **Marcus Owens** discusses one approach the IRS could take to revoke the organization’s tax exempt status while bypassing the normal appeals process. *(This article also appeared in the August 19th issue of Tax Notes and the August 15th issue of Tax Notes Today.)*

August 19, 2002

“U.S. Regs on Compensatory Stock Options Get Mixed Reviews”

*Tax Notes International Magazine*

In this article, **Patricia Lewis** gives her opinion about recently proposed IRS regulations that would require companies to include stock-based compensations when determining operating expenses for the purposes of qualified cost-sharing arrangements. *(This article also appeared in the August 16th issue of Tax Practice and Controversies, the August 8th issue of Worldwide Tax Daily, the August 7th issue of Tax Notes Today, and the August 5th issue of Tax Notes.)*

August 2002

“Asbestos Settlement”

*Corporate Counsel*

Julie Davis, Elihu Inselbuch, and Peter Lockwood are mentioned for their work on behalf of the Committee of Unsecured Asbestos Creditors in the Pittsburgh Corning litigation which settled for $2.7 billion dollars in favor of the asbestos claimants.

August 2002

“The Service’s Tough Shelter Talk Turns to Action”

*The Insurance Tax Review*

**Richard Skillman** and **Christopher Rizek** are quoted in this article about recent tax shelter developments. *(This article also appeared in the July 19th issue of Tax Practice & Controversies, the July 9th issue of Tax Notes Today and the July 8th issue of Tax Notes.)*

August 2002

“Federal Tax Credits Needed to Fuel Political Engine”

*The Exempt Organization Tax Review*

The article discusses a recent conference of the American Enterprise Institute for Public Policy Research where **Trevor Potter** and other guest speakers expressed support for a federal tax credit for political contributions. *(This article also appeared in the July 1st issue of Tax Notes and the June 25th issue of Tax Notes Today.)*

August 5, 2002

“Many Energy Companies Create Offshore Havens to Cut Tax Bills”

*Wall Street Journal*

In this article, **H. David Rosenbloom** explains that setting up foreign entities to avoid U.S. taxes has been around for a long time and under the current system is a perfectly legal strategy for tax minimization.

August 5, 2002

*CNN Financial News Netwok*

**H. David Rosenbloom** was interviewed on live television by Kathleen Hays and Bruce Francis regarding offshore tax havens on August 5th.
SEPTEMBER 2002

**Recent Publications**

**September 2002**

“Tax Accounting Monthly Column”  
*Corporate Business Taxation Monthly*  
By: James Salles  
This column addresses proposed amendments to the section 457 regulations that would currently tax compensatory options at grant, new “safe harbor” rules for utility financing orders, and the IRS’ 2002-03 business plan.

**August 5, 2002**  
“A Blueprint for Creating a Taxable Subsidiary”  
*The Exempt Organization Tax Review*  
By: Lloyd H. Mayer  
The article summarizes a recent IRS private letter ruling which Mr. Mayer believes is an excellent blueprint for creating and structuring an exempt organization’s relationship with its taxable subsidiaries.

**August 2-8, 2002**  
“Treasury Department Closing the Door on Tax Shelters”  
*Washington Business Journal*  
By: Christopher Rizek  
The article discusses the government’s recent legislative, regulatory, and administrative actions aimed at curbing the use of tax shelters.

**August 2002**  
“The Viability of Multidisciplinary Practice”  
*The Insurance Tax Review*  
By: Mortimer M. Caplin  
The article about MDP partnerships between accountants and lawyers is based on Mr. Caplin’s remarks made during the Medal in Law Ceremony at UVA School of Law on April 12, 2001.  
*(This article also appeared in the July 2, 2002 issue of Tax Notes Today, the July 1, 2002 issue of Tax Notes and the May 2002 issue of The Washington Lawyer.)*

**August 2002**  
“Tax Accounting Monthly Column”  
*Corporate Business Taxation Monthly*  
By: James Salles  
This column discusses statutory changes affecting the "nonaccrual experience method" under section 448 and various capitalization developments.

**Head of the Class**

**August 2002** –  
We are pleased to announce that **H. David Rosenbloom** has been appointed Director of the International Tax Program at New York University Law School. In this capacity, he will oversee the program’s academic direction, the choice of courses and faculty, and the marketing of the program. This unique LL.M program is offered exclusively to foreign lawyers in private practice.

**August – December, 2002**  
Location: University of Pennsylvania Law School, Philadelphia, PA  
Adjunct Faculty: **Matthew Frank**  
Mr. Frank will teach a semester-long course on International Tax at the law school.

**September – December, 2002**  
Location: Georgetown University Law Center, Washington, DC  
Adjunct Faculty: **Jessica Katz**  
Ms. Katz will teach a semester-long course on U.S. Taxation of International Income at the law school.