

SPEAKER'S CORNER**UPCOMING EVENTS****FEBRUARY / MARCH 2004****February 20, 2004****First Annual NYU Gerald L. Wallace-Charles S. Lyon National Tax Workshop**

Location: Orlando, FL

Speaker: **David Rosenbloom**

Mr. Rosenbloom will speak on international taxation.

March 4-5, 2004**Association of University Technology Managers (AUTM) Annual Meeting**

Location: Marriott RiverCenter, San Antonio, TX

Speaker: **Milton Cerny**

Mr. Cerny will speak on tax issues affecting universities and intellectual property discoveries.

For more information, see:<http://www.autm.net/meetings/autm2004/start.html>**March 10-13, 2004****Covering Philanthropy and Nonprofits Beyond 9/11**

Location: Los Angeles, CA

Speaker **Douglas Varley****For more information see:**http://www.usc.edu/schools/annenberg/asc/projects/wkc/featured_seminar.html**March 15-16, 2004****New Developments in Foreign Tax Credit Planning**

Location: Palace Hotel, San Francisco, CA

Speaker: **Neal Kochman**On March 16th, Mr. Kochman will speak on foreign tax credit redeterminations under Section 905(c).**For more information, see:**<http://www.atlas-sfi.com>**March 26, 2004****Virginia Tax Study Group**

Location: University of Virginia Law School, Charlottesville, VA

Speakers: **Mortimer Caplin** and **Christopher Rizek**

Mr. Caplin will review recent changes in the tax law and regulations and the prospective changes that lie ahead. Mr. Rizek will discuss current tax shelter issues.

HEAD OF THE CLASS**Spring 2004****American University's Washington College of Law**Faculty: **Milton Cerny**

Mr. Cerny will teach a nonprofit tax course to law school students.

Spring 2004**Georgetown University**Faculty: **Lloyd Mayer**

On March 27, 2004, Mr. Mayer will teach a legal and ethical issues class as part of Georgetown University's Nonprofit Management Executive Certificate Program.

NOTES AND NOTABLES

March 21-24, 2004

Firm Sponsors Tax Conference

Caplin & Drysdale will be one of the sponsors of the Tax Executives Institute's 54th Midyear Conference. The conference will be held at the Grand Hyatt Washington in Washington, DC.

February 2004

New Members

Neal Kochman has become a member of the firm. Mr. Kochman has been with the firm as an associate. He will continue to focus his practice on tax planning, taxation of benefits, bankruptcy tax issues, and tax controversy matters.

Michael Pfeifer will be joining the firm as a member of the international tax practice group on February 17th. Mr. Pfeifer has spent the past several years at Ernst & Young as the Director of the International Private Client Services Group where he focused on cross-border tax matters for individuals and corporations.

Ronald Reinsel joined the firm at the end of November as a member of the firm's civil litigation and creditors' rights practice groups. Mr. Reinsel has over 17 years of experience in commercial bankruptcy, business reorganization, and bankruptcy-related litigation.

February 2004

Firm and Attorneys Listed as Leaders in Tax

The World Tax 2004 book, published by The International Tax Review, lists **Caplin & Drysdale** as one of the top seven tax firms in Washington, DC. It also recommends **Patricia Lewis** as a leading lawyer in transfer pricing and **David Rosenbloom** in the area of cross-border structuring.

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

February 2, 2004

C&D Attorney Will Give Speech to New Admittees of District Court Bar

David Webster was invited by Federal Judge Ellen Segal Huvelle to give a speech to the new admittees of the District Court Bar. Mr. Webster plans to focus his speech on what it means to be a lawyer; how a trained lawyer addresses a problem; why lawyers are sought out as problem solvers of legal, social and political problems; what it means to keep a secret; and how a good lawyer must learn to prefer someone else's interests before his/her own. He will also discuss the history of the courthouse and will give a comparison of the current state of the profession with what it was 45 years ago.

January 24, 2004

Attorney Chaired Anniversary Event

Milton Cerny was the chairperson of Mt. Olivet United Methodist Church's 150th Anniversary Dinner. The church is the oldest church in Arlington, Virginia. Leaders of the Arlington County Board and a representative of Gov. Warner read proclamations recognizing the Church and its history.

January 20, 2004

UVA Luncheon

Mortimer Caplin addressed a UVA luncheon at the University Club introducing President John T. Casteen who delivered his "State of the University" report to a large group of loyal UVA alumni.

December 15, 2003

Gifts for the Homeless, Inc.

Caplin & Drysdale was mentioned in the *Legal Times* as one of the supporters of last year's campaign for Gifts for the Homeless, Inc. Money, clothing and blankets were donated to the organization to help the homeless in the Washington, D.C. community.

December 2003

Natural Resources Defense Council

Thomas Troyer delivered the keynote speech to the Natural Resources Defense Council's Annual Meeting in New York.

RECENT PUBLICATIONS

February 2004

“India: A New Era”

*Exempt Organizations Tax Review
International Tax Notes*

By: **Milton Cerny** and **Marva Rowan**

The article on the nonprofit law of India discusses the benefits for both present and future gifts to nonprofit organizations in India.

November-December 2003

Markers and Musings: The Proposed Section 482 Service Regulations

The Tax Executive

By: **Patricia Lewis**

To read the article, go to:

<http://www.capdale.com/articles/articlelist.asp?LastName=54&x=2&y=5>

November-December 2003

Corporate Tax Departments and the New Focus on Corporate Criminality

The Tax Executive

By: **Scott Michel**

To read the article, go to:

<http://www.capdale.com/articles/articlelist.asp?LastName=55&x=9&y=5>

IN THE NEWS

January 23, 2004

“Politicians’ Nonprofits Proliferate: While the Organizations Do Good, Critics Warn They Can Be Used to Circumvent Rules Governing Campaign Finance”

The Philadelphia Inquirer

Trevor Potter comments on how politicians should not use a charity for overtly political purposes.

January 23, 2004

“Senate Finance Committee Staff Members Say APA Probe ‘Strictly a Process Review’”

Daily Tax Report

Patricia Lewis noted that the Senate Finance Committee’s review of the APA program raises concerns about taxpayer information getting into the hands of competitors.

January 21, 2004

“Practitioners Say Senate Inquiry Halts APA Case Processing”

Tax Management Transfer Pricing Report

Patricia Lewis comments on the IRS’ recent decision to postpone processing of taxpayers cases while the Senate Finance Committee reviews whether corporations are using the Advance Pricing Agreement Program as a tax shelter. (This article also appeared in the January 20th issue of the *Daily Tax Report*.)

January 12, 2004

“There’s Money in Those Databases”

National Journal

Kirk Jowers discussed how companies that provide comprehensive campaign finance and lobbying data can help determine which organizations are not filing required lobbying disclosure reports with Congress.

January 12, 2004

“IRS Moves to Control Tax Lawyers”

The National Law Journal

The appointment of **Cono Namorato** to the IRS as its new Director of Professional Responsibility is mentioned in the article along with the IRS’ proposed new regulations to crack down on abuses on the use of opinion letters in tax practice.

(The article also appeared in the January 12th issue of *Texas Lawyer*; the January 8th issues of the *New York Law Journal*, *Miami Daily Business Review* and the *Palm Beach Daily Business Review*; the January 7th issue of *The Legal Intelligencer*, the January 6th issue of *The Recorder*, the January 5th issue of the *Legal Times*; the December 30th issue of *The International Herald Tribune*; and the December 29th issue of *States News Service*.)