

SPEAKER'S CORNER**UPCOMING EVENTS****AUGUST / SEPTEMBER****August 28, 2003****Annual Parsons Lecture in Taxation, Corporate, and Commercial Law**

Location: University of Sydney, Sydney, Australia

Speaker: **David Rosenbloom**

Mr. Rosenbloom will speak on "International Tax Planning by Multinationals: The Problem of Related Party Loans."

August 31 – September 5, 2003**57th Annual Congress of the International Fiscal Association**

Location: Sydney Convention & Exhibition Centre, Darling Harbour, Sydney, Australia

Speaker: **David Rosenbloom**

On September 2nd, Mr. Rosenbloom will be the Chair of a seminar entitled "Direct Tax Aspects of Financial Services." The seminar will address a series of issues relating to timing and character in the direct taxation of these entities and instruments.

For additional information, see:<http://www.ifa-sydney.com/>**September 3, 2003****University of Utah's Coffee and Politics**

Location: University of Utah, Salt Lake City, Utah

Speaker: **Kirk Jowers**

Mr. Jowers will speak live on this local radio and TV show on "The Future of Money & Politics: The U.S. Supreme Court Hears Oral Arguments on the Bipartisan Campaign Reform Act."

September 22 - 23, 2003**Third Annual Transfer Pricing Forum 2003**

Location: Essex House on Central Park, New York City, New York

Speakers: **David Rosenbloom** and **Patricia Lewis**

On September 22nd, Mr. Rosenbloom will speak on taxpayer facilitation of competent authority negotiations. On September 23rd, Ms. Lewis will speak on how transfer pricing rules interact with other tax provisions.

For additional information, see:www.euromoneyplc.com/tpforum2003

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

RECENT PUBLICATIONS

August 2003

“Tax Accounting Monthly Column”

Corporate Business Taxation Monthly

By: **James Salles**

The tax accounting column discusses the latest proposed regulations on “split-dollar” life insurance arrangements, proposed changes to the “spread periods” for certain accounting method changes, and a new IRS ruling allowing utilities to treat the proceeds of certain fuel surcharges as loans.

August 2003

“The CEELI Institute Looks to the Future: Entering a New Stage of Law Reform”

The Exempt Organization Tax Review

By: **Milton Cerny**

July 15, 2003

“Effect of Tax Policy on U.S. Competitiveness”

Federal Document Clearing House Congressional Testimony

By: **David Rosenbloom**

Mr. Rosenbloom’s testimony before the U.S. Senate Finance Committee on the effect of tax policy on U.S. competitiveness was published.

July 2003

“The Effect of the Bipartisan Campaign Act on Exempt Organizations”

The Exempt Organization Tax Review

By: **Lloyd Mayer**

Summer 2003

“The Changing Generations”

Senior Lawyer News

By: **Mortimer Caplin**

Mr. Caplin’s commencement speech to the University of Virginia Law School’s graduating class was published.

NOTES AND NOTABLES

July 15, 2003

C&D Attorney Testifies Before the Senate Finance Committee

David Rosenbloom testified before the U.S. Senate Finance Committee his views on U.S. tax policy and its effect on the international competitiveness of U.S.-owned foreign operations.”

To read Mr. Rosenbloom’s testimony, see:

<http://www.capdale.com/articles/articlelist.asp?LastName=50&x=6&y=8>

IN THE NEWS

July 31, 2003

“Convicted Spy Led FBI to Papers Buried in Parks”

The Washington Post

Preston Burton comments on the convicted spy, Brian P. Regan, who buried more than 20,000 pages of documents he intended to sell to Iraq, Iran and other countries.

July 22, 2003

“Harlan Waksal Resigns From ImClone Posts”

The Washington Post

Preston Burton comments on the challenges facing Martha Stewart’s lawyers and what the payoff would be if the investigation did discover a leak.

July 21, 2003

“Sec. 527 Groups Spent \$430 Million Despite Campaign Finance Laws”

Money & Politics Report

Trevor Potter comments on how reporting laws requiring 527 organizations to identify their donors and disclose expenditures have failed to impact such organizations’ activities.

IN THE NEWS

July 16, 2003

“Buying Influence So-called 527 Committees Spend Millions on Elections with Little Oversight or Accountability”

The Publici

In the article, **Trevor Potter** is surprised by a research finding of the high level of financial activities involving 527 organizations.

July 15, 2003

“Hearing of Senate Finance Committee”

Federal News Service

“U.S. Senator Charles E. Grassley (R-IA) Holds Hearing on the Effect of the Tax Policy on U.S. Competitiveness”

FDCH Political Transcripts

David Rosenbloom’s testimony before the U.S. Senate Finance Committee is mentioned.

July 11, 2003

“Long-Term Capital’s Meriwether Takes on IRS With Long-Shot Bet”

Bloomberg.com

Christopher Rizek mentions how the IRS has been very upfront about its focus on abusive tax transactions and shelters in the article.

July 9, 2003

“Halliburton Shares Surge on Senate Asbestos Plan”
Houston Business Journal

Caplin & Drysdale is mentioned in the article regarding a report it sent to the Senate Judiciary Committee on how Halliburton Co., which agreed to pay \$4.25 billion to settle claims, would pay no more than \$675 million to a proposed trust fund for victims.

(Similar articles have appeared in Forbes.com and CNN.com.)

July 9, 2003

“U.S. Stock-Index Futures Drop; Microsoft, Ford Pace Declines”

Bloomberg

Caplin & Drysdale is cited in a report in which Halliburton Co. may save more than \$3.5 billion under an asbestos law being considered by the U.S. Senate.

(A similar article appeared in the July 8th issue of the Financial Times, UK.)

July 9, 2003

“Recruiting for New Iraq Army to Begin Next Week”
BC Cycle

Walter Slocombe comments on how the officers of the new Iraqi army will be obligated to sign statements renouncing the Baath party.

July 9, 2003

“U.S. to Appoint Council to Represent Iraqis”

The Washington Post

The article mentions how **Walter Slocombe** is working to train an Iraqi army division of 12,000 within a year and a 40,000-soldier force within three years.

July 2, 2003

“Ernst & Young Resolves Tax Shelter Case”

ABCNews.com

Associated Press Online

Christopher Rizek indicates that requiring firms to register certain tax transactions is the best way to deter the marketing and purchasing of possibly illegal tax shelters. *(The article has also appeared in the July 3rd issues of Deseret News and BC Cycle.)*

June 19, 2003

“Pressing Foundations to Give More”

The Chronicle of Philanthropy

In the article, **Marcus Owens** discusses how the IRS currently only requires expenses of foundations to be “reasonable and necessary” and that there is no requirement that the expenses be the least cost possible to accomplish the organization’s objective.

May 2003

“Unsafe Havens?”

Fidelity Outlook

Christopher Rizek explains how to weigh the risks of tax shelters in the article.