

SPEAKER'S CORNER**UPCOMING EVENTS****OCTOBER****October 1, 2002****2002 Cogel Conference**

Location: Ottawa Marriott, Ottawa, Canada

Speaker: **Trevor Potter**

Mr. Potter will discuss political campaigning on the Internet at this conference.

For more information, see:<http://www.cogel.org/agenda.pdf>**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.

For more information, see:http://www.lorman.com/seminars/seminar_agenda.php?pid=38692&tid=&sid=MD&**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**ABA Program on Criminal Tax Fraud and Money Laundering**

Location: Washington, DC

Speaker: **Scott Michel**

Mr. Michel will speak on voluntary disclosures and eggshell audits.

October 31 – November 1, 2002**Nonprofit Excellence Conference**

Location: Washington Marriott, Washington, DC

Speaker: **Marcus Owens**On November 1st, Mr. Owens will speak on the importance of good financial information.**For more information, see:**<http://www.nonprofitexcellence.com>**NOVEMBER****November 13-15, 2002****30th Annual Tax Seminar on Private Foundations**

Location: La Costa Resort and Spa, Carlsbad, CA

Speaker: **Thomas Troyer**

Mr. Troyer will speak on fiscal agents and other intermediary grantees and how to avoid conduit traps in foundation grantmaking. He will also give an overview of what private foundations can and can't do in the public policy process.

DECEMBER**December 2-3, 2002****Distressed Investing 2002**

Location: The Plaza Hotel, New York, NY

Speaker: **Elihu Inselbuch**

Mr. Inselbuch will participate in a panel that will give an update on asbestos bankruptcies.

For more information, see:<http://www.renaissanceamerican.com>

NOTES AND NOTABLES

October 1, 2002

New Attorneys

Preston Burton has joined the firm's litigation group as partner. He was previously a partner at the Law Office of Plato Cacheris where he represented prominent individuals and corporations in numerous high profile investigations. While at the firm, he will continue to focus his practice on the areas of white collar crime and civil litigation.

Sharon Light and **Roy Moss** have joined the firm as associates. Ms. Light will be part of the firm's exempt organizations and political activity law practice groups. Mr. Moss will concentrate in employee benefits matters.

October 2002

New Honors

Patricia Lewis and **Beth Kaufman** have been selected to be listed in the directory of *The Best Lawyers in America*.

Nathan Finch has been given an AV rating from Martindale-Hubbell, the company's highest award for professional excellence.

RECENT PUBLICATIONS

October 2002

"Tax Accounting Monthly Column"

Corporate Business Taxation Monthly

By: **James Salles**

The column discusses the new regulations and revenue procedures concerning changes of taxable years.

September 2002

"Tax Accounting Monthly Column"

Corporate Business Taxation Monthly

By: **James Salles**

The column discusses proposed amendments to the section 457 regulations that would currently tax compensatory options at grant, a new revenue procedure offering a "safe harbor" for utility financing orders, and tax accounting aspects of the IRS' 2002-03 business plan.

For more information, see:

<http://www.capdale.com/db30/cgi-bin/pubs/Salles09-02.pdf>

August 2002

"Evaluating and Managing Tax Shelter Risks"

Practical U.S./Domestic Tax Strategies

By: **Christopher Rizek**

The article examines some of the risks arising from the federal government's heightened scrutiny of corporate tax shelter transactions. It also identifies information you can collect to help you evaluate your risks and actions you can take to help manage that risk.

July-August 2002

"Second First?? Transfer Pricing Issues in Secondment of Personnel"

The Tax Executive

By: **Patricia Gimbel Lewis**

The article examines the transfer pricing issues involved when an employee from one company is temporarily transferred overseas to another company. Using Germany's model approach as an example, she discusses how these issues can be resolved by having clear, objective, and easily administered rules.

IN THE NEWS

September 30, 2002

“EO Workplan For Fiscal 2003 Unveiled”

Tax Notes

Marcus Owens discusses the Examination projects of the workplan that the IRS's Exempt Organizations Division intends to implement beginning October 1st.

September 27-October 3, 2002

“InnerLoop”

Washington Business Journal

Preston Burton's move to the firm is mentioned.

September 23, 2002

“Tax Shelter Settlement Program Raises Questions”

Tax Notes

Tax Notes Today

In the article, **Christopher Rizek** praises the IRS's efforts to quickly settle tax-shelter cases before they reach litigation. **David Rosenbloom** expresses his reservations about the IRS's current approach in the COLI settlement proceedings.

September 23, 2002

“Inadmissible”

Legal Times

Preston Burton's move to Caplin & Drysdale to practice law is mentioned.

September 23, 2002

“Democracy in Czech”

Roll Call

Milton Cerny is pictured with Madeleine Albright during the dedication ceremony in honor of Tomas Garrigue Masaryk, the first president of Czechoslovakia who wrote the country's Declaration of Independence in Washington, D.C. over 184 years ago.

September 18, 2002

“Monument to Freedom: Founding Father of Czechoslovakia to Get Homage in United States”
The Prague Post

Milton Cerny comments on the statue of former Czech President Tomas Garrigue Masaryk. Through his efforts, Mr. Cerny spearheaded the campaign to bring the statue from the Czech Republic to the United States. A dedication in honor of the statue was held on September 19th at the T.G. Masaryk Memorial Park in Washington, D.C. The American Friends of the Czech Republic concluded the celebration with a dinner attended by Czech President Vaclav Havel, Madeleine Albright, World Bank President James Wolfensohn, and Tom Ridge.

September 13, 2002

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

Tax Practice & Controversies

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 3rd issue of Worldwide Tax Daily, the September 2nd issue of Tax Notes, and the August 30th issue of Tax Notes Today.)*

September 12, 2002

“527 Law Dealt Big Blow”

Roll Call

Trevor Potter comments on the Alabama federal judge's ruling regarding the constitutionality of the 527 law.

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

IN THE NEWS

September 11, 2002

“Court Strikes Down Portions of Section 527 Disclosure Law”

Tax Notes Today

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.

(This article also appeared in the September 9th issue of Tax Notes and the September 3rd issue of the Daily Tax Report.)

September 11, 2002

“Daschle Stalls Campaign Reform Battle”

The Hill

Trevor Potter is quoted in the article about the lack of response from the Democratic Party to overturn the campaign finance regulations issued recently by the FEC.

August 5, 2002

“Honors and Appointments”

Legal Times

Christopher Rizek’s recent appointment as a Fellow of the American College of Tax Counsel is mentioned.