

SPEAKER'S CORNER**UPCOMING EVENTS****MAY****May 2-3, 2003****ABA's Section of Administrative Law and Regulatory Practice 2003 Spring Meeting**

Location: San Juan, PR

Speaker: **Trevor Potter**

Mr. Potter will serve as moderator for a panel discussion on the new federal election reform law and its effect on state and local administration of elections.

May 8, 2003**New Issues In Estate Planning 2003**Speaker: **Beth Shapiro Kaufman**

In this ALI-ABA telephone seminar, Ms. Kaufman will be addressing some of the key concerns of estate planning practitioners. The program will also cover the need for elder law approaches to certain estate planning issues and will outline ways in which traditional estate planners might become fully engaged in this growing practice area.

For more information, see:<http://www.ali-aba.org/aliaba/crslstf.htm>**May 13, 2003****Atlanta Estate Planning Council Seminar**

Location: Atlanta, GA

Speaker: **Beth Shapiro Kaufman**

Ms. Kaufman will speak on "Hot Topics" in estate planning.

May 19, 2003**IRS Continuing Education Conference**Speaker: **Beth Shapiro Kaufman**

Ms. Kaufman will speak on "Recent Developments" in estate planning during this live video broadcast to all IRS estate and gift tax examiners and appeals officers in the country.

May 19-21, 2003**MAR/Hedge Conference on Hedge Fund Risks & Challenges**

Location: Millennium Broadway Hotel, New York, NY

Speaker: **Richard Skillman**

Mr. Skillman will serve as a panelist on "The Evolution of Tax Rules and Insurance Products." The panel will discuss the on-going changes in the treatment and regulation of tax-advantaged structures and products that could have a profound effect on hedge funds and their investors. The panel will also examine the changes that have occurred or are being considered and analyze what they mean for the market.

For more information, see:<http://www.marhedge.com>**JUNE****June 2-3, 2003****Mealey's Asbestos Bankruptcy Conference**

Location: The Westin Hotel, Philadelphia, PA

Speakers: **Elihu Inselbuch** and **Peter Lockwood**

On June 2nd, Mr. Elihu will give an update on the current bankruptcy landscape including the impact of recent filings. On June 3rd, Mr. Lockwood will be discussing the value of companies post-bankruptcy.

For more information, see:http://www.mealeys.com/conferences/sem_AsbBnk603.html**June 2-4, 2003****2003 RAA Education Conference**

Location: Four Seasons Hotel, Philadelphia, PA

Speaker: **Richard Timbie**

On June 2nd, Mr. Timbie will be a panel speaker on the "Effect of Sarbanes-Oxley Rules on Tax Practices."

For more information, see:<http://community.reinsurance.org/source/Meetings/MeetingsHome.cfm?section=Events>

SPEAKER'S CORNER

JUNE

June 5, 2003

Annual Spring Estate Planning Practice Update

Speaker: **Beth Shapiro Kaufman**

Ms. Kaufman will speak on current and important issues in estate planning during this ALI-ABA live satellite television program.

For more information, see:

<http://www.ali-aba.org/aliaba/VPDO605.htm>

June 5-6, 2003

55th Annual Virginia Conference on Federal Taxation

Location: Charlottesville, VA

Speakers: **Mortimer Caplin** and **Richard Skillman**

On June 6th, Mr. Caplin will be chairing the afternoon session in which Mr. Skillman will speak on "Hot Issues in Deferred Compensation."

For more information, see:

http://www.vacle.org/php-bin/ecommm4/products.php?product_id=323&PHPSESSID=ac5defee84cc0d75d7183e4247430d18

June 23-25, 2003

American Conference Institute's National Forum on Corporate Compliance with the Bipartisan Campaign Reform Act

Location: St. Regis Hotel, Washington, DC

Speakers: **Trevor Potter** and **Kirk Jowers**

Mr. Potter is co-chairing this conference and will present an "Update on the Constitutional Challenge." Mr. Jowers will speak on "Devising an Effective Corporate Political Speech and Communication Strategy Under the BCRA." He will also speak during a post-conference workshop on "How Corporations Can Establish and Administer Political Committees (including PACs) and Engage in Regulated Political Activities Under BCRA."

For more information, see:

<http://www.americanconference.com/contentframes.cfm?ID=2133>

June 27, 2003

Czechoslovak Art and Sciences International Conference

Location: Cedar Rapids, Iowa

Speaker: **Milton Cerny**

Mr. Cerny will discuss international philanthropy and charitable cross-border grant making at this conference.

RECENT PUBLICATIONS

May/June 2003

"Tax Law and the First Amendment Meet in National Federation"

Taxation of Exempts

By: **Lloyd Mayer**

May 2003

"What Has Treasury Wrought"

The Exempt Organization Tax Review

By: **Milton Cerny**

Mr. Cerny has reprised his International Dateline Column. In his debut column, he discusses how public charities must help to rebuild Iraq but that Treasury guidelines established to help charities avoid funding terrorists could slow these efforts.

May 2003

"Letter Ruling Alert - Teamwork Counts: Collaborating Hospitals Avoid Unrelated Business Treatment"

The Exempt Organization Tax Review

By: **Kristen Gurdin**

In the article, Ms. Gurdin discusses a PLR in which the IRS ruled that tax-exempt hospital's lease of a portion of its research facility to another exempt hospital will not be an unrelated trade or business.

May 2003

"Tax Accounting Monthly Column"

Corporate Business Taxation Monthly

By: **James Salles**

Mr. Salles' column on tax accounting issues discusses the controversy about capitalizing taxpayers' internal costs (labor and overhead) and the treatment of the issue in the proposal "INDOPCO regulations."

IN THE NEWS

April 30, 2003

**“FEC May Audit Common Cause Head for Breaches”
Roll Call**

Kirk Jowers is quoted in the article on how a campaign's failure to respond in time to numerous requests for information can often trigger an FEC audit.

April 28, 2003

“Former, Current IRS Officials Discuss Intermediate Sanctions”

Tax Notes Today

“Exempt Organizations: Practitioner Predicts Legislative Crackdown on Exempt Groups’ Executive Compensation”

Daily Tax Report

Marcus Owens’ remarks on section 4958 are mentioned in these articles.

April 27, 2003

“CEO’s Rewards At Non-Profit”

“Irvine Foundation’s Downturn: Questions Surround Compensation As Foundation Was Hit By Recession”

San Jose Mercury News

Marcus Owens is quoted in these articles on how the IRS should have audited a financially declining foundation for various reasons, but due to staffing cuts and a shift in priorities, there has been a decrease in the auditing of non-profits by the IRS each year.

April 23, 2003

“The Kojo Nnamdi Show”

NPR – WAMU FM Radio

Trevor Potter participated in a live radio discussion on campaign finance reform.

April 7, 2003

“Reform Still In Limbo”

Roll Call

Trevor Potter discusses the importance of the three judge review panel in reaching a decision fairly quickly with regard to the McCain-Feingold legislation and how its further delay will prevent it from being considered this term in the Supreme Court.

April 7, 2003

“War In Iraq Reconstruction”

Financial Times (London)

Walter Slocombe is mentioned in the article for being tapped by the Pentagon to serve a senior role in the transition of Iraq.

April 5, 2003

“Vietnam Vet Who’ll Build A New Baghdad; Alex Brummer’s Washington Dispatch ‘Make-it-happen’ Buy Is Bush’s Choice To Run Iraq”

Daily Mail (London)

“Keeping Promises After The Fight”

The Korea Herald

April 4, 2003

“Saudis Hold U.S. To Pre-War Vows”

Winnipeg Sun (Mainitoba, Canada)

Walter Slocombe is mentioned in these articles as being part of the team assembled by retired Major General Jay Garner to take part in forming an interim Iraqi administration.

April 2, 2003

“Practitioners Hail Notice Curbing Use Of Section 482 In Lease Stripping Case”

Tax Management Transfer Pricing Report

Patricia Lewis criticizes the IRS's use of Section 482 in lease stripping cases. **Matthew Frank** is also mentioned in the article.

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

NOTES & NOTABLES

April 2003

**Firm Ranked Leading D.C. Tax Practice
Tax Attorney Ranked Leading Practitioner**

Chambers USA: America's Leading Business Lawyers has ranked **Caplin & Drysdale** the leading tax practice in the District of Columbia based on interviews conducted with clients and other lawyers in the field. Caplin & Drysdale was mentioned as D.C.'s "premiere tax boutique" and was recommended for its "across the board excellence." The book also states that the firm is known for "attracting top-quality talent from the IRS and Treasury Department, and thus retains a useful insight into the workings of government agencies." Also, **David Rosenbloom** was named as one of the leading tax attorneys in D.C. He received widespread accolades as the "dean of the international tax bar." He was particularly noted for his knowledge of tax treaty matters.

April 2003

**Firm Ranked High In East Coast Tax Law Firm Listing
Tax Attorneys Ranked Among Top Practitioners**

International Tax Review has ranked **Caplin & Drysdale** as one of the top East Coast firms in the tax planning, cross-border structuring, and transfer pricing areas. The article also singled out **David Rosenbloom** and **Patricia Lewis** on its list of top international tax practitioners on the East Coast. The results of the rankings were compiled by responses to questionnaires that were sent to in-house tax experts and chief financial officers at the world's leading international corporations and financial institutions.

HEAD OF THE CLASS

May 5-9 2003

University of Utah

Faculty: **Kirk Jowers**

Mr. Jowers will teach a class on "Money, Politics, and the U.S. Presidency."