

Tax Disputes & Tax Litigation

The IRS, with the assistance of the Department of the Treasury and the Department of Justice, enforces the complex Federal Internal Revenue Code in a myriad of ways that can impact individual taxpayers and business entities. Where international issues are present, these cases can be even more complicated. At times, the process can bewilder any taxpayer caught up in a tax controversy. Clients call upon Caplin & Drysdale for our broad and deep knowledge of the tax controversy process and for the credibility we bring in our interactions with the IRS and other domestic and foreign tax authorities.

Although most tax disputes are resolved by agreement or administrative settlement, sometimes the only way a taxpayer can seek to prevail is to go to court, adding another dimension of risks and opportunities. Caplin & Drysdale's highly-skilled litigators can translate the firm's substantive knowledge and courtroom experience into a winning litigation strategy in the various forums in which tax cases can be litigated, including the U.S. Tax Court, the U.S. Court of Federal Claims, and Federal District Courts, Bankruptcy Courts, and the various appellate courts around the country.

Caplin & Drysdale attorneys have advised clients in controversies spanning the full range of the Internal Revenue Code, including individual and corporate income taxes, estate and gift taxes, payroll taxes and "backup withholding," nonresident withholding taxes, and excise taxes; an array of state and local taxes on individuals and businesses; and reporting penalties asserted against taxpayers, information return filers, tax return preparers and "promoters," and persons required to file reports of foreign accounts ("FBARs").

Areas of Focus

THE TAX CONTROVERSY PROCESS

Planning for an IRS Audit

An IRS audit may come as an unwelcome surprise. There are times, however, when it is clear from the outset that an audit of a tax return is likely. The taxpayer may already be under examination, or the return may implicate transactions that are already under scrutiny or include transactions or disclosures that are likely to attract attention. In such cases, prudent steps can be taken either (i) in connection with the initial filing of the return; or (ii) after filing, but before the taxpayer is on notice of an impending audit, that could pay big dividends later. Steps to consider at the pre-filing stage include:

- A well-crafted explanation or disclosure statement on the return may reduce the likelihood of an audit or frame its focus in a more favorable way.
- Surveying the return for potential audit flag issues or exposures.
- A review of past filings for which the statutes of limitation remain open, particularly if the sensitive issue has implications for those years, can guide strategy for a current filing.
- Identifying and gathering supporting documents up front as to any subject that is expected to be the initial focus of the audit can often help focus the IRS' inquiries and shorten an audit.
- Understanding and developing the facts regarding the taxpayer's reliance on professional advice, including who provided the advice and in what format, and thinking through potential privilege and waiver concerns.

Even after a tax return has been filed, action before the proverbial knock on the door may preempt an audit and/or mitigate exposures. Steps to consider at this stage include:

- Amending returns before an audit begins may help protect against penalties.
- Requesting deadline relief, i.e., seeking rulings to permit the taxpayer to make an election or take other actions for which the deadline has otherwise already passed.
- Filing protective tax returns or refund claims can start the running of statutes of limitation or protect against possible “whipsaw” situations, where the IRS might contend, for example, that a tax benefit was claimed by the wrong taxpayer and/or in wrong taxable year and the mistake could no longer be corrected.

Rectifying Prior Tax Errors and Tax Non-Compliance

As the complexity of our tax system increases, so too does the opportunity for technical and procedural foot-faults. At times, the flurry of new reporting requirements and the detailed procedures for making elections can confuse even the most seasoned of return preparers. The attorneys at Caplin & Drysdale have decades of experience assisting taxpayers in rectifying prior tax errors across a wide range of issues. In some cases, errors can be corrected with a simple amended filing. In others, a special request must be submitted to the IRS – either in the form of a “9100 relief” request or through a request for a private letter ruling. More complex matters may require direct discussions with senior personnel at the IRS to determine the best method of remediation. Caplin & Drysdale attorneys leverage their depth of experience from both inside and outside of the government to determine the best methods for our clients.

Caplin & Drysdale has also advised hundreds of clients on various methods for voluntarily disclosing prior non-compliance with reporting requirements, particularly those involving foreign assets, income or transactions. Our attorneys have assisted clients with so-called “quiet disclosures,” with submissions through the IRS’s Delinquent International Information Reporting Submission Procedures (DIIRSP), and with delinquent tax return submissions through the IRS’s Streamlined procedures. We are well-versed in the pros and cons of each of the IRS’s civil disclosure options, and in helping clients determine whether they might have criminal exposure necessitating consideration of the IRS’s Voluntary Disclosure program. Attorneys from our Criminal Tax Cases practice are available to consult with clients who may have such exposure.

Navigating IRS Audits

Caplin & Drysdale has decades of experience in assisting clients in IRS field audits and related proceedings, as well as audits conducted out of the Service Center and other dealings with the IRS examination function. Our attorneys can play a variety of roles, depending on the client’s preferences, in cooperation with other in-house or outside professionals where appropriate. In complex cases one or two Caplin & Drysdale attorneys may face the IRS while others remain “on background.”

We are equipped to provide our clients with informed and practical advice on many types of procedural issues, including:

- preserving the taxpayer’s statutory rights and access to court, and rights under potentially applicable tax treaties;

- understanding the IRS' rights to obtain information from the taxpayer and third parties;
- coordinating dealings with different IRS functions, accessing IRS Appeals, soliciting technical advice from the National Office, and other available internal avenues for dispute resolution; and
- considering state and local amended filings and related procedural issues.

Caplin & Drysdale marries extensive experience with these issues with substantive tax expertise spanning many areas of the Internal Revenue Code. At the audit stage, our attorneys can assist in crafting sophisticated submissions for review up the management chain or to District Counsel, or as a more formal request for technical advice. We can also weigh in on how an audit can be managed with an eye to how the substantive issues are expected to play out before IRS Appeals or in court, and in making the related judgment calls, including:

- Tactical questions:
 - Should the taxpayer try to improve the revenue agents' report or press for a quick conclusion and rely on IRS Appeals?
 - Should the taxpayer seek or agree to extensions of the statute of limitations?
- Audit management:
 - How best should the taxpayer manage and respond to IRS information requests?
 - What will be the most effective way to manage relations with the examiner(s) and other involved IRS personnel?
- Affirmative Issues:
 - How should taxpayers best raise new potentially favorable ("affirmative") issues on audit for the examiners' consideration?
 - When should formal amended returns or protective refund claims be filed?
- Modeling and cash flows:
 - What assumptions should be made for purposes of reporting financial accounting tax reserves?
 - Should taxpayers make a payment on account or a refundable "deposit"?
 - Should taxpayers request "quickie refunds" of carrybacks or excess estimated tax payments?

Handling IRS Administrative Appeals

While our goal always is to achieve success for our clients at the earliest possible stage, it is not always possible to resolve all audit issues at the IRS examination level. When necessary, we assist clients with preparing written protests to the IRS Office of Appeals and in preparing for conferences with Appeals in an attempt to reach a settlement of any contested issues. Caplin & Drysdale attorneys have experience with both the "traditional" Appeals procedures, as well as the special alternative dispute resolution options available through Appeals, including Fast Track, Early Referral, Rapid Appeals Process, and Post-Appeals Mediation.

Planning for Appeals is often best accomplished in conjunction with the development of a client's audit strategy. However, Caplin & Drysdale is also available to consult with taxpayers who are new to the firm. We are both comfortable with and experienced in working with a client's other tax advisors – whether internal or

external – who handled the client’s IRS audit. We have significant experience in working with accounting firms and return preparers and in using our legal expertise in conjunction with the technical expertise of clients’ accountants.

If a dispute with the IRS implicates collections issues, Caplin & Drysdale can assist with requesting a Collection Due Process (or equivalent) hearing from Appeals. We have successfully represented numerous clients in such hearings, achieving the release of liens and levies and abatement of penalties.

Litigating Tax Cases Though Trial and Appeal

The decision to litigate a tax case can be one of the most important decisions that a client may make. No tax trial is routine. Every case requires a unique strategy and evidentiary game plan. Every tax case requires a deep understanding of the tax law. Caplin & Drysdale’s tax litigation team has decades of experience combining these two legal disciplines – litigation and tax.

Caplin & Drysdale’s litigation team includes former senior leaders at the Tax Division of the U.S. Department of Justice, the Internal Revenue Service Office of Chief Counsel, and the Office of the U.S. Attorney of the Department of Justice. The size of Caplin & Drysdale’s litigation team allows it to handle cases of all sizes and staff projects appropriately. In many cases, Caplin & Drysdale’s litigation group co-counsels with one or more members from the firm’s substantive tax practices (*e.g.*, international tax, corporate tax, partnership tax, trust and estate tax, insurance tax) to develop strategy and leverage the firm’s deep understanding of the subject matter.

While the majority of tax litigation occurs in the U.S. Tax Court, many of our clients’ cases are litigated in the U.S. District Courts throughout the country, the U.S. Court of Federal Claims, the U.S. Courts of Appeal, as well as U.S. Bankruptcy Courts and state courts. Our attorneys have decades of experience representing clients in each of these forums. We are also frequently called upon to represent third party fact witnesses in trials involving other taxpayers, represent taxpayers in IRS summons enforcement actions, FOIA actions, unlawful disclosure of taxpayer information actions, and IRS collection cases involving Federal tax liens and levies.

Representative engagements include:

- Represented the owners of a large privately held agribusiness and their related captive insurance company in the U.S. Tax Court involving a so-called section 831(b) micro-captive insurance transaction and obtained a full concession of all taxes and penalties.
- Represented an estate before the U.S. Tax Court concerning a spousal exemption involving issues of Israeli law and place of marriage celebration and obtained a favorable ruling after cross-motions for summary judgment.
- Represented a limited liability company facing penalties related to disallowed charitable contribution deduction for conservation easements and obtained a dismissal of the penalties based on the reasonable cause reliance on counsel and substantial authority defenses.
- Currently representing several third-party witnesses, including an economist from a big four accounting advisory firm and former in-house chief of procurement, in all phases of litigation including trial in a \$1 billion dollar section 482 transfer pricing case in the U.S. Tax Court.

- Reached global settlement with IRS Office of Chief Counsel in 80 separate Tax Court cases involving common employee benefit plan tax issues.
- Represented a large Wall Street financial services firm in appeal to the U.S. Court of Appeals for the Seventh Circuit involving income tax accounting issues of expenses associated with certain derivative swap transactions.
- Represented a hedge fund and its tax matters partner in a three-way TEFRA partnership litigation with the IRS and an adverse partner in the U.S. Court of Federal Claims concerning the characterization and allocation of income to one of its investors.
- Brought an FOIA action for an environmental activist group that was under examination by the IRS, and after we learned from documents that a foreign country's government had improperly asked the IRS to revoke the group's tax exemption, the IRS dropped the examination.
- Represented a private foundation and defended its tax exemption in a declaratory judgment proceeding brought in the U.S. Tax Court.
- Represented a global professional services firm in connection with delinquent U.S. filings and obtained a highly favorable pre-litigation settlement with the examination team.

SPECIALIZED EXPERTISE

Sensitive and Potential Fraud Issues on Audit

An IRS examination of a taxpayer that may have potential fraud-related issues can create substantial risks for the taxpayer, as the IRS procedures generally require a civil examiner to refer cases with “badges of fraud” for potential criminal investigation and prosecution. Such audits are typically called “eggshell audits,” since the ultimate objective is to resolve the case civilly without “cracking the eggshell” of a criminal referral.

Caplin & Drysdale has represented taxpayers in eggshell audits since the firm's inception in 1964. At times our attorneys appear in such examinations, and at times, for tactical reasons, we remain in the background while other professionals interact with the IRS. These types of audits require careful planning and staffing, and an experienced advisor will appreciate the range of tactical and sometimes difficult decisions that need to be made in the course of the examination. Our attorneys have had numerous and confidential successes in our “eggshell audit” representations, where we have managed to resolve as a civil matter circumstances where a criminal referral might have been possible. These types of cases are difficult to navigate, but where such audits are concluded civilly, the taxpayer can generally rest assured that the matter will not proceed to a more serious inquiry.

Defending International and FBAR Reporting and Penalty Cases

Decades before the IRS began focusing on international reporting issues in 2008, Caplin & Drysdale attorneys were representing clients in IRS examinations and in litigation concerning the reporting of foreign bank accounts and other foreign assets. In many of our prior representations our attorneys have been successful in persuading the IRS to reduce or even abate significant penalty adjustments.

These types of cases include:

- The assessment of substantial “willful” or even “non-willful” penalty assessments for the failure to file foreign bank account reports, known as FBARs, and actions by the Department of Justice to collect such penalties (FinCEN Form 114).
- Penalties imposed for a taxpayer’s reporting violations relating to the receipt of distributions from a foreign trust or the taxpayer’s relationship to such a trust (Forms 3520/3520A).
- Penalties arising from the failure to report gifts or inheritance from foreign sources, including non-U.S. family members (Forms 3520).
- Penalties resulting from the failure to report controlled foreign corporations (Form 5471).

The strategy and tactics in these international penalty cases depend heavily on the facts involved, including the sources of assets held overseas, the taxpayer’s knowledge and understanding of the relevant reporting rules, and advice that may have been given (or not given) by prior professional advisors. Effective representation also hinges on an understanding of the often complex and sometimes frustrating procedures followed by the IRS in such cases, where a misstep can create significant issues for taxpayers as the cases move forward.

Caplin & Drysdale’s attorneys have served in senior IRS and Department of Justice positions and have years of experience in private practice dealing with these unusual cases, which for now remain a high tax enforcement priority.

Controversies Involving Interest on Federal Taxes

Controversies involving the computation of interest under the Internal Revenue Code frequently arise, particularly in cases involving complex transcripts and multiple tax accounts, and can involve large sums. They can arise at any stage in a tax controversy where tax is assessed or a refund allowed, and present a number of procedural traps for the unwary. While a taxpayer can demand return of excess underpayment interest previously paid to the IRS in an ordinary refund claim, a taxpayer that accepts a refund of tax with miscalculated interest can lose rights to challenge the interest computation if the statute of limitations has run on filing a fresh refund claim. Different jurisdictional rules (and a different statute of limitations) apply to taxpayers that claim additional refund interest. The law in this area is also complex and, in some respects, unsettled, particularly as regards the so-called “global netting” rules under which corporations may request equalization of the interest rates charged on their tax liabilities and paid on their refunds.

Caplin & Drysdale has extensive experience working with accountants and other specialists to identify potential claims, and in successfully pursuing corrections through IRS channels (including working with interest computations specialists at Exam, Appeals, and the IRS Ogden campus), and, where necessary, in court. Several of our attorneys are active members of bar of the Court of Federal Claims, where such actions often have to be brought.

Working with the Taxpayer Advocate Service (TAS)

It is no secret that the IRS has had difficulty operating efficiently and effectively in recent years. When taxpayers have tried to resolve their issues with the IRS through the agency's normal procedures, but have either received no response or a response that does not comply with the IRS's own rules, they may be able to seek assistance from the Taxpayer Advocate Service (TAS). Caplin & Drysdale attorneys have represented numerous clients in applications for TAS assistance and in negotiating a reasonable outcome through local Taxpayer Advocates. We are highly experienced in resolving through TAS issues involving, but not limited to, the actual or threatened imposition of liens or levies, erroneous balance due notices, missing refunds, unprocessed tax returns or refund claims, and more.

Defending Against State "False Claims Act" Tax Complaints and State and Local Audits

For years, many states have allowed a private action under traditional *qui tam* principles, where a private party alleges that another party has profited from false claims against the state government. Recently, many states, including the District of Columbia and New York, have expanded these statutes to allow one private individual to sue another for conduct that constitutes tax evasion. Typically, such cases are filed under seal initially, with state-level officials then deciding whether to join the action, in which case it becomes public. Most typically, these cases entail allegations that an individual should have been filing returns or paying taxes in the relevant jurisdiction as a domiciliary or a statutory resident.

Caplin & Drysdale has defended clients in tax *qui tam* actions, focusing first and most importantly on attempting to convince the local authorities not to join in the private actions, which, when that decision is made, often leads to a withdrawal of the case or a quick settlement. If such cases mature into litigation, Caplin & Drysdale's tax litigators will represent the client throughout the proceeding. The firm has many years of experience in the area of state-level domicile and residence issues, and has a body of research and skill into the complex case law that has developed in such matters and that can be drawn upon to allow for an efficient representation.

Our attorneys have also successfully represented taxpayers in audits by state and local taxing authorities, as well as in administrative appeals in those jurisdictions.

Advising Tax Professionals

Over the years, the IRS and the Department of Justice have targeted tax professionals in various types of cases, including major tax shelters, syndicated conservation easements, tax return preparation, and ethical violations. Tax enforcement officials view misconduct by tax professionals as a high priority, and an area where the government can foster voluntary compliance efficiently by deterring alleged wrongdoers. For decades Caplin & Drysdale has often acted as the "lawyer's lawyer," addressing delicate questions arising out of the rendering of complex tax advice, the degree of professional due diligence in a case, the application of tax opinion standards, and the attorney-client work product privileges. Our lawyers have had many successful representations in both the criminal and civil context where the conduct of a professional has been at issue, and we have substantial experience in addressing the unique issues that arise in such cases.

Caplin & Drysdale attorneys also have deep experience in advising return preparers on the procedural and ethical rules that apply to their practice. Drawing on their experience gained in the Department of Treasury and the risk management function of major accounting firms, our attorneys are available to consult on a range of issues facing return preparers, including:

- disclosure rules;
- compliance with Circular 230; and
- the application of AICPA and other professional guidelines.

IRS Office of Professional Responsibility (OPR) Matters

The IRS Office of Professional Responsibility (OPR) enforces a set of ethical rules for tax professionals called Circular 230. Since the early 2000s, when one of Caplin & Drysdale's attorneys was tapped to head this office, OPR has significantly ramped up its enforcement capabilities and efforts to target tax professionals that OPR believes have engaged in violations of Circular 230. Such cases can result in a private reprimand or a public suspension or disbarment from practice before the IRS.

OPR cases often present complex issues arising from the need to apply and interpret Circular 230 to specific facts, and Caplin & Drysdale's attorneys have represented dozens of tax professionals targeted by OPR over the years, in many cases with favorable results, including OPR's termination of the investigation or the issuance of a private letter of reprimand.

Reportable Transaction Compliance and Defense

The IRS has devoted a significant portion of its enforcement resources in recent years to investigating compliance with the detailed rules and regulations regarding reportable transactions. Taxpayers and advisors involved in such transactions – or transactions the IRS deems similar to such transactions – may be required to report their activities on Form 8886 or 8918. Even minor foot-faults in the reporting of these transactions can result in significant penalties, in some cases up to \$200,000 per form per year. Caplin & Drysdale attorneys have experience in advising on whether such reporting is necessary and in defending clients in IRS audits regarding compliance with the IRS's reportable transaction regime.

The firm's attorneys have also been at the forefront of analyzing and applying the emerging case law regarding the IRS's non-compliance with the Administrative Procedure Act (APA), and the effect such non-compliance has on the ability of the IRS to enforce various Notices identifying listed transactions and transactions of interest. In addition to defending against IRS enforcement efforts, the firm's attorneys can also assist taxpayers who have already paid reportable transaction penalties in seeking refunds at either the administrative level or in federal court.

Related Practices

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NEWS

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Mark Allison Responds to Altria's Battle With the IRS
San Francisco Chronicle, 07.21.2011

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Reuters, 07.15.2011

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Containing Overstated Basis Items
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Press Releases | 06.16.2011

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Both | *Chambers USA / The Legal 500*, 06.16.2011

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Evasion Deal
World Radio Switzerland, 06.14.2011

Scott Michel Comments in Bloomberg, Swiss in Talks With U.S. on Untaxed Assets, Official Says
Bloomberg, 06.10.2011

Scott D. Michel Comments in Tax Notes Today Article, IRS to Allow Extensions of August 31 OVDI Application
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The Wall Street Journal, 06.01.2011

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Scott Michel Comments About Offshore Accounts and the End to Bank Secrecy
CNBC, 04.15.2011

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NBC Universal, 04.15.2011

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The New York Times, 04.13.2011

Charles Ruchelman Comments on the IRS's Aggressive Audits of Easements
Dow Jones, 03.15.2011

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The Wall Street Journal, Bloomberg, The New York Times, Automated Trader, Tax Analysts, South China Morning Post, 02.23.2011

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The Wall Street Journal, World Radio Switzerland, The New York Times, Marketplace, 02.03.2011

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09.24.2010

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Nasdaq, 09.21.2010

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U.S. News & World Report, 09.15.2010

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David Rosenbloom Comments on IRS's Reorganization for Global Enforcement
The Wall Street Journal, 08.06.2010

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Bloomberg, Schweizer Fernsehen, 06.17.2010

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Forexyard, The New York Times, 06.09.2010

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BNA, 06.09.2010

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Financial Adviser, 05.24.2010

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Insurance News, 05.11.2010

Caplin & Drysdale Attorneys Comment on the End of the Era of Bank Secrecy
Forexyard, Bloomberg, PRLog, FA Magazine, etc., 05.04.2010

Caplin & Drysdale's Christopher Rizek Testifies at a Capitol Hill Hearing About Federal Employees With
Delinquent Taxes
Committee on Oversight and Government Reform, The Washington Post, etc., 03.19.2010

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Christopher Rizek Comments on Julius Baer Whistleblower
The New York Times, 01.19.2010

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The Washington Post, 11.17.2009

Scott Michel Comments on U.S. Targeting Hong Kong for Tax Evaders
Bloomberg, 11.12.2009

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The Wall Street Journal, 11.03.2009

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The New York Times, ABC News, The Wall Street Journal, Bloomberg, 10.28.2009

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World Radio Switzerland, 10.16.2009

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The Washington Post, Dow Jones, NPR, Bloomberg, CNBC, etc., 09.22.2009

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Le TSR, 09.22.2009

UBS Warns U.S. Clients as Tax Amnesty Deadline Nears

Reuters, 09.18.2009

Something to Aim for

Dealbreaker, 09.08.2009

Swiss Deal With IRS May Hide Some Tax Cheats

The New York Times, 09.07.2009

New OPR Chief Ready to Get Tough

WebCPA, 09.01.2009

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Sunlight Projects, 08.31.2009

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Talent in Demand as Transfer Pricing Disputes Gain Attention

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U.S. and Switzerland Agree to New Tax Treaty

Swiss Info, 06.19.2009

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Awards & Rankings | *Chambers USA*, 06.15.2009

Chip Maker Xilinx Loses Tax Ruling

Wall Street Journal, 05.29.2009

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Miami Herald, 02.20.2009

UBS Faces IRS Fight Over Names
International Herald Tribune, 02.19.2009

U.S. Government Suing UBS to Get at Names of the Rich
The Financial Post, 02.19.2009

U.S. Seeks More UBS Account Records in Tax Battle
Reuters, 02.19.2009

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Corporate Crime Reporter, 02.19.2009

UBS Faces IRS Fight Over Names, Shrs Rise on Deal
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Christopher Rizek Discusses Attorney-Client Privilege on CPA Webinar Series
Virtual, 04.25.2023

Melissa Wiley Moderates Panel on Filing Fees at IFA USA Branch Annual Conference
Chicago, IL, 04.28.2023

Amanda Leon Moderates Panel on Inter-Government Cooperation at Annual Pacific Rim Tax Conference
Redwood City, California, 05.18.2023

Christopher Rizek Moderates Panel on Judicial Review at International Conference on Taxpayer Rights
Santiago, Chile, 05.26.2023

Victor Jaramillo Addresses Dual Residency Issues at ABA U.S. and Europe Tax Practice Trends Conference
Zurich, Switzerland, 03.29.2023

Melissa Wiley Discusses IRS Late Filing Penalties on New York State Society of CPAs Webinar
Virtual, 03.02.2023

Benjamin Eisenstat Analyzes False Claims Act at ABA Midyear Tax Meeting
San Diego, California, 02.11.2023

Melissa Wiley Explores Sources of IRS Criminal Investigations at ABA Midyear Tax Meeting
San Diego, California, 02.11.2023

Scott Michel Addresses Recent Developments in Audits and Tax Controversy at Florida Tax Institute
Tampa, Florida, 02.02.2023

Melissa Wiley Explores How to Prepare for Corporate Transparency Act at Joint Estate Planning Council Meeting
Bethesda, MD, 01.19.2023

Christopher Rizek Explores Ethical Issues at 33rd Annual Institute on Current Issues in International Taxation
Washington, DC, 12.16.2022

Scott Michel Analyzes Ethical Issues with Constitutional and Common Law Privileges at ABA Criminal Tax Fraud and Tax Controversy Institute
Las Vegas, NV, 12.13.2022

Victor Jaramillo Discusses Enforcement Trends at New England IRS Representation Conference
Omni New Haven Hotel, 11.18.2022

Megan Wernke and Melissa Wiley Analyze Formula Clauses at MSBA Advanced Estate Planning Institute Live! Casino and Hotel, Hanover, MD, 11.17.2022

Christopher Rizek and Melissa Wiley Address Ethics in the Post-COVID-19 Era at ABA Philadelphia Tax Conference
The Union League of Philadelphia, 11.15.2022

Melissa Wiley Chairs Panel on Tax Controversy and Tax Litigation Updates at NYU 81st Institute on Federal Taxation – California
Hotel del Coronado, San Diego, CA, 11.13.2022

Melissa Wiley Discusses Corporate Transparency Act at AICPA & CIMA National Tax & Sophisticated Tax Conference
Washington Hilton, Washington, D.C., 11.01.2022

Melissa Wiley Analyzes How to Help Clients with IRS Penalty Abatement at AICPA & CIMA National Tax & Sophisticated Tax Conference
Washington Hilton, Washington, D.C., 11.01.2022

Melissa Wiley Reviews Best Planning Ideas from Conference at AICPA & CIMA National Tax & Sophisticated Tax Conference
Washington Hilton, Washington, D.C., 11.01.2022

Melissa Wiley Joins Bloomberg Panel on the Tax Profession
Virtual, 10.27.2022

Melissa Wiley Chairs Panel on Tax Controversy and Tax Litigation Updates at NYU 81st Institute on Federal Taxation – New York
The Westin New York at Times Square, 10.23.2022

Niles Elber and Melissa Wiley Address Corporate Transparency Act at International Tax Symposium
Virtual, 10.21.2022

Melissa Wiley Explores Corporate Transparency Act at D.C. Bar Tax Audits and Litigation Series
Virtual, 10.19.2022

Victor Jaramillo Explores Recent Civil & Criminal Tax Penalties Developments at ABA Fall Tax Meeting
Hyatt Regency, Dallas, TX, 10.15.2022

Melissa Wiley Discusses When and How to Pursue Tax Litigation at ACTEC Mid-Atlantic Regional Meeting
The Willard InterContinental Hotel, Washington, DC, 09.18.2022

Robert Carney Discusses IRS Guidance and Regulations on Federalist Society Webinar
Virtual, Are IRS Defenses Crumbling?

Melissa Wiley Addresses Corporate Transparency Act at Income Tax Seminar
Virtual, 07.22.2022

Victor Jaramillo Co-Chairs Panel on Blockchain and Cryptocurrency at ABA U.S. and Latin America Tax Practice
Trends Conference
Mandarin Oriental, Miami FL, 06.15.2022

Amanda Leon Addresses Ethical Issues at IFA USA Branch Annual Conference
Ritz-Carlton, Washington D.C., 06.03.2022

Melissa Wiley Discusses Tax Authorities and Penalty Defenses at FBA Insurance Tax Seminar
JW Marriott, Washington, DC, 06.02.2022

Christopher Rizek Moderates Panel on Tax Collection Alternatives at International Conference on Taxpayer
Rights
Harvard Law School (online only), 05.19.2022

Christopher Rizek Addresses Ethical Issues at ABA May Tax Meeting
Hybrid, Marriott Marquis Washington, DC, 05.13.2022

Christopher Rizek Analyzes Ethical Considerations in Tax Collection Representation at ABA May Tax Meeting
Hybrid, Marriott Marquis Washington, DC, 05.13.2022

Melissa Wiley Analyzes Corporate Transparency Act and New Beneficial Ownership Disclosure Rules on CTA
Panel
Miller & Chevalier, 04.26.2022

Niles Elber and Melissa Wiley Analyze IRS Examinations on Lorman Webinar
03.31.2022

Amanda Leon Addresses The Corporate Transparency Act at TEI Midyear Conference
03.21.2022

Niles Elber and Melissa Wiley Address Tax Return Preparers Being Under New Scrutiny on Strafford Webinar
1:00 PM EST
02.10.2022

Melissa Wiley Analyzes Tax Ethics at ABA Midyear Tax Meeting
2:30 PM
02.03.2022

Ross Sharkey Joins Panel on Trying a Civil Tax Fraud Case at ABA Criminal Tax Fraud & Tax Controversy Institute

9:45 AM - 10:35 AM

12.10.2021

Mark Matthews Moderates Panel on IRS Criminal Enforcement Priorities at ABA Criminal Tax Fraud & Tax Controversy Institute

10:30 AM - 11:30 AM

12.09.2021

Scott Michel Moderates Panel on IRS and DOJ Declining Prosecution at ABA Criminal Tax Fraud & Tax Controversy Institute

11:30 AM - 12:30 PM

12.09.2021

Scott Michel Addresses Ethical Issues in International Tax at IFA Winter International Tax Conference

11:00 AM to 12:20 PM

12.09.2021

Melissa Wiley Moderates Panel on Whether Tax Leaks Bring More Audits and Investigations at D.C. Bar Program

12.01.2021

Scott Michel Discusses Whether Tax Leaks Bring More Audits and Investigations at D.C. Bar Program

12.01.2021

Victor Jaramillo Addresses Expatriation at U.S. and UK Tax and Estate Planning Conference

10:00 AM EST

11.24.2021

Robert Carney Presents on BBA Partnership Audit Rules at D.C. Bar Program

11.17.2021

Melissa Wiley Moderates D.C. Bar Program on BBA Partnership Audit Rules

11.17.2021

Christopher Rizek and Melissa Wiley Analyze Captive Insurance and Conservation Easements at AICPA National Tax Conference

11:40 AM - 12:30 PM

11.16.2021

Melissa Wiley Explores Tax Controversy Issues at NYU 80th Institute on Federal Taxation

11.15.2021

Melissa Wiley Addresses How to Avoid and Defend Against Penalties at AICPA National Tax Conference

9:55 AM–10:45 AM and 11:00 AM–11:50 AM

11.15.2021

Christopher Rizek and Melissa Wiley Discuss Ethics Issues in COVID Era at ABA Philadelphia Tax Conference

2:15 PM

11.09.2021

Peter Barnes Moderates Panel on Issues Facing Tax Directors at ABA Philadelphia Tax Conference

11:15 AM

11.09.2021

Victor Jaramillo Addresses IRS Cryptocurrency Enforcement at Latino Tax Fest

10:00 AM to 10:50 AM PST

09.29.2021

Victor Jaramillo Addresses in Spanish IRS Cryptocurrency Enforcement at Latino Tax Fest

12:00 PM to 12:50 PM PST

09.29.2021

Victor Jaramillo Moderates Panel on John Doe Summonses and Crypto Compliance Gap at ABA Fall Tax Meeting

2:00 PM

09.22.2021

Benjamin Eisenstat Moderates Panel on Privacy at ABA Fall Tax Meeting

3:00 PM

09.21.2021

Peter Barnes and Lauren Smith Present U.S. Tax Update to Canadian Petroleum Tax Society

09.09.2021

Patricia Lewis Joins ABA Women in Tax Forum Zoom Tea

4:30 PM ET

07.16.2021

Mark Matthews Addresses New Frontiers in Tax Fraud at Berkeley Fraud Fest

06.25.2021

Jonathan Black Analyzes Ethical and Penalty Issues at NYU Tax Controversy Forum

3:00 PM to 4:00 PM

06.24.2021

Victor Jaramillo Co-chairs Panel on Cryptocurrency Enforcement at ABA U.S. and Latin America Tax Practice Trends Conference

1:00 PM - 2:15 PM

06.21.2021

Robert Carney Moderates Webinar on *CIC Services v. IRS* and Anti-Injunction Act

05.25.2021

Benjamin Eisenstat Addresses Important Developments in Criminal Litigation at ABA 2021 May Tax Meeting

2:30 PM ET

05.11.2021

Victor Jaramillo Discusses Recent Development in Foreign Financial Reporting and Enforcement at ABA 2021 May Tax Meeting

2:30 PM ET

05.11.2021

Robert Carney Explores Taxing Wealth on Federalist Society Webinar

1:30 PM ET

04.16.2021

Elizabeth Stevens Co-Chairs Panel on OECD Pillars at ABA Annual U.S. and Europe Tax Practice Trends Conference

11:00 AM – 12:30 PM ET

03.25.2021

Benjamin Eisenstat Addresses Tax Terms of Art at FBA Tax Law Conference

2:30 PM to 3:30 PM

03.03.2021

Christopher Rizek Explores Ethical Obligations at ABA Midyear Tax Meeting

1:10 PM to 2:00 PM

01.29.2021

Amanda Leon Discusses Recent IRS Compliance Campaigns at ABA Midyear Tax Meeting

4:30 PM to 6:00 PM

01.27.2021

Christopher Rizek Addresses Recent Developments in Court Procedure & Practice at ABA Midyear Tax Meeting

12:30 PM to 2:00 PM

01.27.2021

Amanda Leon Explores Privileges and Penalties at Virtual IFA USA International Tax Conference

11:00 AM - 12:00 PM

12.18.2020

Scott Michel Discusses Tax Compliance Matters at ALI CLE International Trust and Estate Planning Program

2:40 PM

12.09.2020

Christopher Rizek Analyzes Ethical Issues Under the BBA Partnership Audit Regime at UNC School of Law Tax Institute Speaker Series

11:00 AM - 1:30 PM

12.04.2020

Mark Allison Speaking on Tax Controversy and Tax Litigation at NYU 79th Institute on Federal Taxation

11.16.2020

Christopher Rizek Addresses Ethics in COVID-19 Era at ABA Virtual Philadelphia Tax Conference

3:30 PM

11.12.2020

Victor Jaramillo Addresses Reporting Foreign Accounts at Latino Tax Fest

2:30 PM to 3:20 PM

10.28.2020

Victor Jaramillo Addresses in Spanish Reporting Foreign Accounts at Latino Tax Fest

12:30 PM to 1:30 PM

10.28.2020

Scott Michel to Host Conversation with IRS Chief Don Fort on Criminal Tax Enforcement
09.23.2020

Victor Jaramillo Addresses in Spanish International Tax Preparation on LatinoTaxPro Webinar
11:30 PM PT
08.06.2020

Victor Jaramillo Explores International Tax Preparation on LatinoTaxPro Webinar
11:30 PM PT
08.04.2020

Clark Armitage Analyzes Transfer Pricing Insurance at 10th Annual NABE Transfer Pricing Symposium
1:15 PM
07.21.2020

Niles Elber Moderates Panel on Recent Criminal Investigations on ABA Virtual 2020 May Tax Meeting
1:00 PM - 1:20 PM
07.14.2020

Amanda Leon Explores Transfer Pricing Litigation on ABA Virtual 2020 May Tax Meeting
1:00 PM - 2:30 PM
07.02.2020

Niles Elber Addresses Evasion of Payment Prosecutions at FBA Tax Law Conference
4:30 PM - 5:30 PM
03.05.2020

Beth Kaufman Discusses Taxation at Harvard Kennedy School
02.29.2020

Scott Michel Joins Steering Committee for Cambridge Forum on International Tax Disputes
02.26.2020

Victor Jaramillo Discusses Developments in Offshore Compliance and Enforcement at ABA 2020 Midyear Meeting
8:45 AM
02.01.2020

Victor Jaramillo Explores Cryptocurrency Issues at ABA 2020 Midyear Meeting
11:00 AM
02.01.2020

Mark Allison Moderates Panel on Foreign Tax Judgments at ABA 2020 Midyear Meeting
3:20 PM
01.31.2020

Christopher Rizek Discusses Ethics at 32nd Annual Institute on Current Issues in International Taxation
10:45 AM - 11:45 AM
12.20.2019

Kirsten Burmester Analyzes Cross-Border Matters at 32nd Annual Institute on Current Issues in International Taxation

4:15 PM - 5:00 PM

12.19.2019

Kirsten Burmester Discusses BEAT Regulations at D.C. Bar Series

12:50 PM - 2:00 PM

12.05.2019

Scott Michel Analyzes Ethical Issues at 15th Biennial Parker C. Fielder Oil and Gas Tax Conference

10:15 AM

11.22.2019

Scott Michel Explores Compliance Obligations With Foreign Investments and Assets at ALI CLE International Trust and Estate Planning Program

3:30 PM

11.15.2019

Mark Allison Analyzes Latest IRS Campaigns at NYU 78th Institute on Federal Taxation

1:15 PM

11.10.2019

Victor Jaramillo Co-Chairs Panel at IBA New Era of Taxation Conference

11.07.2019

Christopher Rizek Discusses Ethics at NYU 78th Institute on Federal Taxation

5:15 PM

10.24.2019

Mark Allison Moderates Panel at NYU 78th Institute on Federal Taxation

1:15 PM

10.20.2019

Victor Jaramillo Addresses Developments in Offshore Compliance and Enforcement at ABA Fall Meeting

8:45 AM - 12:00 PM

10.05.2019

Beth Kaufman to Speak on Taxing Wealth Hosted by The Tax Policy Center

09.24.2019

Mark Matthews Addresses Tax Collection at International Visitor Leadership Program

09.19.2019

Beth Kaufman Explores Tax Controversies at ACTEC Mid-Atlantic Regional Meeting

09.15.2019

Victor Jaramillo Discusses Opportunity Zones at Latino Tax Fest

8:00 AM - 9:40 AM

08.01.2019

Kirsten Burmester Analyzes Recent IRS Guidance on BEAT, FDII, GILTI, Captive Services 9th Annual NABE Transfer Pricing Symposium

2:30 PM - 3:30 PM

07.16.2019

Christopher Rizek Examines Partnership Representatives at NYU 11th Annual Tax Controversy Forum

11:15 AM

06.20.2019

Mark Allison Addresses Cross-Border Audits and Investigations at NYU 11th Annual Tax Controversy Forum

4:00 PM - 5:00 PM

06.20.2019

Victor Jaramillo Chairs Digital Economy Roundtable at U.S. and Latin America Tax Practice Trends Conference

9:00 AM - 10:30 AM

06.14.2019

Niles Elber Moderates Panel on DOJ Tax Division Update at ABA May Meeting

9:35 AM ET

05.11.2019

Niles Elber Chairs Civil and Criminal Tax Penalties Committee Meeting at ABA May Meeting

8:45 AM - 11:45 AM ET

05.11.2019

Clark Armitage Addresses Transfer Pricing and International Tax Post TCJA and BEPS at Pacific Rim Tax Conference

3:30 PM PT - 5:00 PM PT

05.10.2019

Kirsten Burmester Moderates Panel on Inbound and Outbound Planning After Tax Reform at ABA May Meeting

3:00 PM ET

05.10.2019

Clark Armitage Chairs Competent Authority Panel at USD Transfer Pricing Symposium

11:00 AM PT

05.09.2019

Peter Barnes Moderates Panel on Right to Tax Digital Services and Goods at ABA Section of International Law Conference

4:30 PM - 6:00 PM

04.11.2019

Beth Kaufman Teaches Generation-Skipping Transfer Tax at Florida Fellows Institute

04.11.2019

Scott Michel Co-Chairs Panel on Protecting Taxpayers in an Era of Increased Regulation and Heightened Enforcement at U.S./Europe Tax Conference

2:30 PM - 4:00 PM GMT

04.04.2019

Elizabeth Stevens Examines Transfer Pricing and the U.S. Tax Landscape at TP Minds Conference

5:10 PM - 5:50 PM (London Time)

03.19.2019

Elizabeth Stevens Moderates Panel on What Follows TCJA at FBA Tax Law Conference

11:45 AM - 12:45 PM

03.08.2019

Mark Matthews and Ross Sharkey Explore Sentencing Advocacy in Criminal Tax Cases at FBA Tax Law Conference

2:30 PM to 3:30 PM

03.08.2019

Niles Elber Discusses Domestic Tax Enforcement at FBA Tax Law Conference

4:30 PM to 5:30 PM

03.07.2019

Elizabeth Stevens Chairs International Symposium at FBA Tax Law Conference

03.07.2019

Ross Sharkey Chairs Young Lawyers Symposium at FBA Tax Law Conference

03.07.2019

Scott Michel Leads Discussion on "Tax Avoidance v. Tax Evasion" at Cambridge Forum on International Tax Disputes

02.28.2019

Elizabeth Stevens Discusses Alternatives to Resolving Large, Complicated, Corporate Tax Disputes at Women In Tax Forum

11:05 AM ET

02.26.2019

Clark Armitage Discusses Practical APA Experiences at TP Minds Americas

2:00 PM ET - 2:40 PM ET

02.26.2019

Clark Armitage Leads International Tax Workshop at TP Minds Americas

02.25.2019

Kirsten Burmester Explores Importance of Tax Treaties at IFA USA Annual Conference

9:45 AM to 10:45 AM ET

02.22.2019

Niles Elber Chairs Civil and Criminal Tax Penalties Committee Meeting at ABA 2019 Midyear Meeting

8:30 AM - 11:45 AM CT

01.19.2019

Christopher Rizek Discusses Contingency Fees at ABA 2019 Midyear Meeting

9:15 AM CT

01.18.2019

Scott Michel Moderates Panel on Two-Minute Drills at ABA 2019 Midyear Meeting

2:00 PM CT

01.18.2019

Christopher Rizek Discusses Ethics at 31st Annual Institute on Current Issues in International Taxation

10:45 AM - 11:45 AM

12.14.2018

Kirsten Burmester Analyzes Cross-Border Matters at 31st Annual Institute on Current Issues in International Taxation

4:45 PM - 5:45 PM

12.13.2018

Kirsten Burmester Moderates Panel on Transfer Pricing Disputes at International Tax Summit

2:20 PM

11.29.2018

Clark Armitage Explores Tax Planning Strategies for Multinational Companies at Bloomberg Tax Leadership Forum

3:10 PM ET

11.29.2018

Kirsten Burmester Examines Nonresident Tax Compliance at MACPA 2018 Advanced Tax Institute Conference

2:45 PM

11.12.2018

Mark Allison Discusses Tax Controversy and Tax Litigation at NYU 77th Institute on Federal Taxation

1:15 PM

11.11.2018

Christopher Rizek Examines Keeping Your Communications Confidential at Insurance Tax Conference

11.09.2018

Scott Michel Explores Tax Transparency and Compliance at ALI CLE International Trust and Estate Planning Program

1:30 PM

11.01.2018

Peter Barnes Chairs NFTC Fall Tax Meeting Panel on Mutual Agreement Procedure and Dispute Resolution

10.25.2018

Christopher Rizek Discusses Ethical Issues at NYU 77th Institute on Federal Taxation

5:15 PM to 6:55 PM

10.25.2018

Mark Allison Moderates Panel on Tax Controversy and Tax Litigation at NYU 77th Institute on Federal Taxation

1:15 PM

10.21.2018

Clark Armitage Discusses Dispute Resolution at IICJ New York Conference

11:15 AM

10.16.2018

Victor Jaramillo Moderates Panel on Global Trends in Withholding Taxes at IBA Annual Conference
10.10.2018

Niles Elber Chairs Civil and Criminal Tax Penalties Committee Meeting at ABA 2018 Fall Meeting
8:30 AM - 11:45 AM
10.06.2018

Niles Elber Moderates Panel on Offshore Voluntary Disclosure Program at ABA 2018 Fall Meeting
11:00 AM
10.06.2018

Victor Jaramillo Examines Global Trends in Transparency and Disclosure at ABA 2018 Fall Meeting
3:00 PM
10.05.2018

Victor Jaramillo Explores Inbound Financing After Tax Reform at ABA 2018 Fall Meeting
9:30 AM
10.04.2018

Elizabeth Stevens Addresses U.S. Tax Reform at AICPA & CIMA U.S. Tax Reform Conference
09.17.2018

Clark Armitage Moderates Panel on Cross-Border Business at AICPA & CIMA U.S. Tax Reform Conference
11:15 AM
09.17.2018

Clark Armitage Explores Audits Under U.S. Tax Reform at AICPA & CIMA U.S. Tax Reform Conference
09.17.2018

Peter Barnes and Elizabeth Stevens Chair Tax Incentives Panel at 2018 International Fiscal Association Congress
09.05.2018

Peter Barnes Addresses U.S. Tax Reform at 2018 International Fiscal Association Congress
09.05.2018

Kirsten Burmester Discusses Nonresident Tax Compliance on Strafford Webinar
1:00 PM - 2:30 PM EDT
08.07.2018

Niles Elber Addresses Representing Clients Without Records at IRS Nationwide Tax Forum
07.19.2018

Kirsten Burmester Discusses Tax Cuts and Jobs Act at 8th Annual NABE Transfer Pricing Symposium
10:30 AM to 12:00 PM
07.18.2018

Victor Jaramillo Addresses International Tax Planning Incentives at 8th Annual NABE Transfer Pricing Symposium
8:30 AM to 10:00 AM
07.18.2018

Mark Matthews Discusses Role of the Press in Tax Cases at NYU 10th Annual Tax Controversy Forum

11:00 AM

06.22.2018

Scott Michel Analyzes Unreported Foreign Assets at NYU 10th Annual Tax Controversy Forum

2:40 PM - 3:40 PM

06.21.2018

Scott Michel Examines Whether Human Rights Are Affected By Tax Information Reporting and Disclosures at ABA Paris Sessions

11:00 AM - 12:30 PM

06.09.2018

Scott Michel Explores Ethical Consideration with International Clients at STEP Miami 9th Annual Summit

11:50 AM

06.01.2018

Elizabeth Stevens Explores Tax Reform and Transfer Pricing at D.C. Bar Series

12:00 PM to 2:00 PM

05.30.2018

Clark Armitage and Amanda Leon Discuss BEAT, GILTI and FDII at International Monetary Fund Meeting

05.23.2018

Jonathan Brenner and Elizabeth Stevens Discuss Impact of Tax Reform on Partnerships and LLCs on Strafford Webinar

1:00 PM - 2:30 PM EDT

05.16.2018

Niles Elber Moderates Panel on Department of Justice Tax Division at ABA May Meeting

9:20 AM

05.12.2018

Niles Elber Chairs Civil and Criminal Tax Penalties Committee Meeting at ABA Midyear Meeting

8:30 AM - 11:45 AM

05.12.2018

Niles Elber Explores Title 31 International Penalties at ABA May Meeting

4:00 PM

05.11.2018

Christopher Rizek Discusses Taxpayer Rights at ABA May Meeting

9:15 AM

05.11.2018

Christopher Rizek Moderates Panel on Accounting Evidence at ABA May Meeting

11:30 AM

05.11.2018

Elizabeth Stevens Explores CoGS at ABA May Meeting

12:45 PM

05.10.2018

Scott Michel Serves as Section Vice Chair at 2018 ABA Section of Taxation May Meeting
05.10.2018

Clark Armitage Explores Impact of Tax Reform on Puerto Rico at Act 20/22 Society Forum
05.04.2018

Christopher Rizek Moderates Panel on Cross-Border Taxation at 3rd International Conference on Taxpayer Rights
05.03.2018

Scott Michel Discusses Ethics in Tax Controversy at TEI Audits & Appeals Seminar
3:15 PM to 4:30 PM
05.01.2018

Christopher Rizek Discusses a General Counsel's Tales from the Confessional at J. Nelson Young Tax Institute
2:30 PM to 4:30 PM
04.27.2018

Christopher Rizek Discusses Tax Controversy at Portland Tax Forum
7:00 AM to 9:00 AM
04.26.2018

Peter Barnes Analyzes the Morality of International Tax Planning at J. Nelson Young Tax Institute
2:20 PM to 3:20 PM
04.26.2018

David Rosenbloom Discusses Tax Cuts and Jobs Act at 18th Annual NYU/KPMG Tax Symposium
7:00 AM to 7:00 PM
04.25.2018

David Rosenbloom and Clark Armitage Present on GILTI and BEAT at 33rd Annual Spring Tax Day of the Committee of Banking Institutions on Taxation in New York City
3:30 PM - 5:00 PM
04.23.2018

Christopher Rizek Addresses Issues in Tax Court at Florida ACTEC Program
04.20.2018

Christopher Rizek Explores Reporting Positions at Florida ACTEC Program
04.20.2018

Clark Armitage Discusses IRS APMA Report on ABA Committee Call
04.18.2018

Amanda Leon Speaks on Fundamentals of Tax Litigation at Young Tax Lawyers Symposium
1:00 PM - 2:00 PM
04.13.2018

Christopher Rizek Examines Ethics for Young Tax Lawyers at Young Tax Lawyers Symposium
4:15 PM - 5:15 PM
04.13.2018

Mark Allison Discusses Impact of U.S. Tax Reform on Brazilian Individuals, Companies and Investments at Brazilian Tax Conference

10:30 AM

04.12.2018

Elizabeth Stevens Discusses Centralized Partnership Audit Regime at D.C. Bar

12:00 PM to 1:45 PM

04.04.2018

Peter Barnes Discusses Territorial Taxation and Base Erosion at University of Virginia Law School

2:00 PM to 3:30 PM

03.23.2018

Mark Matthews Examines Anti-Money Laundering at International Tax Conference

10:20 AM

03.22.2018

Mark Matthews Discusses Aggressive Tax Planning at International Tax Conference

12:30 PM

03.22.2018

Mark Matthews Analyzes Criminal Actions Against Advocates at International Tax Conference

2:30 PM

03.22.2018

Mark Matthews Explores Role of Private Practitioners and Disclosure in Tax Administration at International Tax Conference

12:15 PM to 12:30 PM

03.22.2018

Elizabeth Stevens Moderates Panel on How U.S. Tax Reform Will Impact Transfer Pricing Planning at TP Minds International

03.20.2018

Niles Elber Discusses Government's Arsenal in Criminal Tax Investigations at FBA Tax Law Conference

1:40 PM to 2:40 PM

03.09.2018

Scott Michel Discusses Taking on a Criminal Tax Case at ABA White Collar Crime Conference

10:30 AM

02.28.2018

Matthew Hicks and Ross Sharkey Discuss Ethical Considerations for In-House Tax Professionals at TEI Corporate Tax Management Seminar

2:10 PM to 3:00 PM

02.27.2018

Peter Barnes Discusses Future of Corporate Tax Departments at 46th Annual Conference of the International Fiscal Association

4:30 PM to 5:30 PM

02.22.2018

Clark Armitage Moderates Panel on How Eaton Decision and U.S. Tax Reform are Affecting APAs at TP Minds Americas

02.20.2018

Clark Armitage Analyzes Transfer Pricing Disputes at TP Minds Americas

02.19.2018

Victor Jaramillo Discusses U.S. Tax Reform at International Tax Commission of the Mexican Institute of Public Accountants

02.14.2018

Victor Jaramillo Examines U.S. Tax Reform at COPARMEX Queretaro

02.13.2018

Victor Jaramillo Discusses Implications of U.S. Tax Reform on Mexican Companies at Mexican U.S. Tax Reform Event

02.13.2018

Niles Elber Chairs Civil and Criminal Tax Penalties Committee Meeting at ABA 2018 Midyear Meeting

8:30 AM - 11:45 AM

02.10.2018

Ross Sharkey Discusses Developments in Sentencing Guidelines at ABA 2018 Midyear Meeting

8:30 AM - 11:45 AM

02.10.2018

Elizabeth Stevens Discusses Tax Issues Facing Service Members at ABA 2018 Midyear Meeting

3:00 PM

02.09.2018

Clark Armitage and Kirsten Burmester Discuss International Tax Implications of the 2017 Tax Act

01.23.2018

David Rosenbloom Explores U.S. Tax Reform at Confindustria Vicenza

11:00 AM

01.12.2018

David Rosenbloom Discusses U.S. Tax Reform at University of Padova

4:00 PM

01.12.2018

David Rosenbloom Presents on U.S. Tax Reform for Italian Companies Looking to the U.S.

4:30 PM

01.11.2018

Scott Michel Moderates "Representing the Global Citizen" Panel at National Institute Tax Controversy Conference

12.08.2017

Mark Matthews Moderates IRS Criminal Investigation Roundtable at National Institute Tax Controversy Conference

12.07.2017

Niles Elber Explores How the IRS is Asserting Penalties at National Institute Tax Controversy Conference

4:30 PM to 5:30 PM

12.07.2017

Scott Michel Discusses AML and Tax at Financial Crimes Enforcement Conference

4:00 PM - 5:15 PM

12.04.2017

Mark Matthews Chairs Individual Cross Border Matters Panel at 30th Annual Institute on Current Issues in International Taxation

2:45 PM to 3:45 PM

12.01.2017

Scott Michel Examines Ethical Issues in International Tax at 30th Annual Institute on Current Issues in International Taxation

10:30 AM to 11:45 AM

12.01.2017

Kirsten Burmester Discusses Avoiding Foreign Trust Throwback Tax at Strafford Webinar

1:00 PM ET to 2:00 PM ET

11.28.2017

Christopher Rizek Discusses Ethics at 14th Biennial Parker C. Fielder Oil and Gas Tax Conference

9:00 AM

11.17.2017

Mark Matthews Discusses Compliance Initiatives/Voluntary Disclosure at ALI CLE International Trust and Estate Planning Program

3:25 PM

11.10.2017

Christopher Rizek Addresses M&A Ethics, Conflicts and More at TEI Seminar

3:00 PM - 4:15 PM

11.07.2017

Mark Matthews Presents at the 2017 Legal Week International Private Client Forum

11.03.2017

Patricia Lewis Discusses Recent Developments of Transfer Pricing Regimes and Practices at Korean TP Seminar

11.02.2017

Clark Armitage Analyzes Transfer Pricing Disputes at 5th Annual International Tax Enforcement and Controversy Conference

11:15 AM - 12:15 PM

10.27.2017

Scott Michel Co-Chairs 5th Annual International Tax Enforcement and Controversy Conference

10.27.2017

Christopher Rizek Analyzes Today's Ethical and Penalty Issues at NYU 76th Institute on Federal Taxation

5:15 PM to 6:55 PM

10.26.2017

Mark Matthews Presents on Renewable Tax Controversy Resource at Southern Federal Tax Institute

3:30 PM to 4:30 PM

10.25.2017

Scott Michel and Mark Allison Discuss Civil and Criminal Tax at NYU 76th Institute on Federal Taxation

1:15 PM

10.22.2017

Peter Barnes Chairs NFTC Fall Tax Panel on LB&I, Tax Treaties and Transfer Pricing

3:00 PM to 4:30 PM

10.19.2017

Scott Michel Explores International Tax Enforcement at D.C. Bar Webinar

12:15 PM to 1:45 PM

10.11.2017

Kirsten Burmester Explores Expatriation Planning for the Global Citizen at AICPA Webinar

1:00 PM ET to 2:00 PM ET

09.28.2017

Neal Kochman Discusses Inbound and Outbound Transfer Pricing at Basics of International Taxation 2017 PLI Conference

1:00 PM

09.19.2017

Niles Elber Moderates Panel on Introduction to New Chief of Criminal Investigations at ABA Joint Fall CLE Meeting

10:00 AM

09.16.2017

Niles Elber Chairs Civil and Criminal Tax Penalties Committee Meeting at ABA Joint Fall CLE Meeting

8:30 AM - 11:45 AM

09.16.2017

Christopher Rizek Walks Through OPR Investigative Process at ABA 2017 Joint Fall CLE Meeting

1:30 PM

09.15.2017

Arianna Caldwell Moderates Panel on Ethical Issues in Federal Tax Practice at ABA 2017 Joint Fall CLE Meeting

3:30 PM

09.15.2017

Mark Allison Speaks on How to Conduct Witness Interviews at ABA Joint Fall CLE Meeting

11:30 AM

09.15.2017

Mark Matthews Discusses Automatic Exchange of Financial Information at 71st Congress of the International Fiscal Association

08.28.2017

Victor Jaramillo Explores the Exchange of Information Between Argentina and United States at Torcuato Di Tella University

08.24.2017

Scott Michel Discusses Audit and Controversy Experiences in Colombia and the U.S. at 2017 Joint IFA Meeting

08.24.2017

Victor Jaramillo Explores U.S. Tax Obligations for International Clients at Latino Tax Pro 2017 National Convention (English Session)

08.10.2017

Victor Jaramillo Explores U.S. Tax Obligations for International Clients at Latino Tax Pro 2017 National Convention (Spanish Session)

08.09.2017

Patricia Lewis to Discuss Recent U.S. Transfer Pricing Litigation at 7th Annual NABE Transfer Pricing Symposium

8:30 AM to 10:00 AM

07.19.2017

Elizabeth Stevens to Discuss Recent Apple Case at 7th Annual NABE Transfer Pricing Symposium

1:45 PM to 3:15 PM

07.19.2017

Neal Kochman to Discuss Inbound and Outbound Transfer Pricing at Basics of International Taxation 2017 PLI Conference

Transfer Pricing– Inbound and Outbound

07.19.2017

Clark Armitage to Discuss Tax Reform at 7th Annual NABE Transfer Pricing Symposium

1:15 PM - 2:15 PM

07.18.2017

Charles Ruchelman to Speak at Kentucky Captive Association Conference

8:10 AM - 9:00 AM

06.16.2017

Scott Michel to Moderate International Enforcement Panel at the NYU 10th Annual Tax Controversy Forum

06.15.2017

Victor Jaramillo Discusses Developments in Tax Administrations and Their Approach to Tax Controversy Compliance

2:00 PM - 3:30 PM

06.15.2017

Clark Armitage to Speak on Dispute Resolution at OECD International Tax Conference

1:30 PM to 2:30 PM

06.06.2017

Kirsten Burmester to Speak on Mastering Form 5472 Webinar Panel

1:00 PM - 2:50 PM ET

05.24.2017

Mark Matthews and Scott Michel to Discuss Future of U.S. Cross-Border Criminal Tax Enforcement at Dubai Conference

9:50 AM - 10:30 AM

05.18.2017

Mark Matthews and Scott Michel to Speak on FATCA at Dubai Private Client Breakfast Seminar

05.15.2017

Patricia Lewis on APMA Roundtable Panel at ABA May Meeting

8:30 AM

05.13.2017

Niles Elber to Moderate Panel on Criminal Investigations at ABA May Meeting

9:20 AM

05.13.2017

David Rosenbloom to Speak on the Impact Brexit Will Have on U.S. Multinationals at 2017 ABA May Meeting

3:00 PM

05.12.2017

Charles Ruchelman and Mark Allison to Speak to Delaware Captive Insurance Association on IRS Tools Used to Investigate Captive Insurance Companies

05.08.2017

Elizabeth Stevens to Speak on Competent Authority at 5th Annual USD Transfer Pricing Symposium

10:00 AM

04.27.2017

Clark Armitage to Speak on DBCFT at 5th Annual USD Transfer Pricing Symposium

2:45 PM

04.27.2017

Clark Armitage to Discuss Transfer Pricing Controversies at Tax Planning Strategies Conference in Barcelona

11:00 AM to 12:30 PM

04.06.2017

Charles Ruchelman to Speak at D.C. Bar on Tax Audits and Litigation Tax

12:00 PM to 1:30 PM ET

04.05.2017

Christopher Rizek to Speak on Privacy and Transparency at 2nd International Conference on Taxpayer Rights

03.13.2017

Clark Armitage to Speak on Tax Reform's Impact to Small Business Owners

03.10.2017

Scott Michel to Speak on Trends in Criminal Tax Enforcement at ABA 31st Annual National Institute on White Collar Crime

03.08.2017

Christopher Rizek to Speak on Appeals at FBA Tax Law Conference

11:55 am to 12:55 pm

03.03.2017

Clark Armitage and Kirsten Burmester Speak on Successfully Using APAs at TP Minds Transfer Pricing Summit Americas

9:00 AM to 11:30 AM

02.23.2017

Clark Armitage to Speak on Transfer Pricing Disputes and ADR Opportunities at TP Minds Transfer Pricing Summit Americas

02.22.2017

Mark Matthews to Speak on FBAR Cases at Private Client Forum Americas 2017

02.15.2017

Mark Matthews to Speak on International Tax and Money Laundering Enforcement at STEP NY Event

02.08.2017

Niles Elber to Speak on DOJ and Restitution at ABA Tax Section 2017 Midyear Meeting

9:20 AM

01.21.2017

Christopher Rizek to Speak on Ethical Issues at ABA Tax Section 2017 Midyear Meeting

2:30 PM

01.20.2017

Elizabeth Stevens to Speak on Foreign Tax Credit at ABA Tax Section 2017 Midyear Meeting

8:30 AM

01.20.2017

Arianna Caldwell to Moderate Panel on Subpart F Tax at ABA Tax Section 2017 Midyear Meeting

4:00 PM - 5:00 PM

01.19.2017

Elizabeth Stevens to Moderate Panel on Transfer Pricing Litigation at ABA Tax Section 2017 Midyear Meeting

4:00 PM

01.19.2017

Clark Armitage to Speak on Transfer Pricing Litigation at ABA Tax Section 2017 Midyear Meeting

4:00 PM

01.19.2017

David Rosenbloom to Speak on the Role of "Fairness" in International Tax Policy at GWU-IRS International Tax Conference

8:00 AM - 9:00 AM

12.16.2016

Christopher Rizek to Speak on Ethics at GWU-IRS International Tax Conference

5:00 PM - 6:00 PM

12.15.2016

Niles Elber to Speak on Offshore Enforcement at ABA Criminal Tax Fraud and Tax Controversy Conference
3:35 PM – 4:25 PM
12.08.2016

Christopher Rizek and Charles Ruchelman to Speak on Captive Insurance at Delaware Captive Insurance Association Webinar
12:15 PM to 2:00PM
12.01.2016

David Rosenbloom to Speak on Investment and Tax at Resilience Conference Berlin
11.30.2016

David Rosenbloom to Speak on State Aid Controversy at International Tax Institute Seminar
12:15 PM to 2:00 PM
11.17.2016

Mark Allison to Speak on Hot Audit/Controversy Issues at NYU 75th Institute on Federal Taxation
11.15.2016

David Rosenbloom to Speak on International Tax at KPMG Event
12:30 PM - 1:25 PM
11.15.2016

Mark Allison to Speak on IRS Representation Tools, Techniques And Defensive Strategies at NYU 75th Institute on Federal Taxation
11.13.2016

Scott Michel to Speak on International Information Sharing at 2016 Forum on International Tax Disputes
11.11.2016

Scott Michel to Speak on Administration, Penalties and Tax Payer Rights at 2016 Forum on International Tax Disputes
11.10.2016

Victor Jaramillo to Speak at Magno Evento Anual Anefac Mcallen 2016
10.28.2016

Mark Matthews to Speak on Compliance Initiatives/Voluntary Disclosure at ALI CLE International Trust and Estate Planning Program
10.28.2016

Christopher Rizek to Speak on Ethical and Penalty Issues for Tax Practitioners at NYU 75th Institute on Federal Taxation
10.27.2016

Mark Allison to Speak on Hot Audit/Controversy Issues at NYU 75th Institute on Federal Taxation
10.23.2016

Scott Michel and Mark Allison to Speak on IRS Representation Tools, Techniques And Defensive Strategies at NYU 75th Institute on Federal Taxation
10.23.2016

Victor Jaramillo to Speak on Voluntary Disclosure Programs at Procopio International Tax Institute Conference
10.21.2016

Clark Armitage to Speak on Transfer Pricing at Michigan Law School
10.13.2016

Niles Elber to Speak on Department of Justice Tax Division at 2016 ABA Joint Fall Meeting
9:00 AM
10.01.2016

Mark Matthews to Speak on Using Financial Intelligence at ACAMS 15th Annual AML & Financial Crime Conference
09.26.2016

Scott Michel to Speak at 2016 Joint Meeting of the USA and Italy Branches of IFA
09.23.2016

David Rosenbloom to Speak on International Tax at 2016 Klaus Vogel Lecture
09.23.2016

Mark Matthews to Speak on Financial Transparency and Common Reporting Standards at 2016 IBA Annual Conference
10:45 am - 12:30 pm ET
09.20.2016

Neal Kochman to Discuss Inbound and Outbound Transfer Pricing at PLI Conference
1:00 PM
09.20.2016

Neal Kochman to Discuss Inbound and Outbound Transfer Pricing at PLI Conference
1:00 PM
07.20.2016

Clark Armitage to Speak on Functional Analysis vs. Value Chain Analysis at 6th Annual NABE Transfer Pricing Symposium
07.20.2016

Patricia Lewis to Speak at 6th Annual NABE Transfer Pricing Symposium
07.19.2016

Mark Allison to Speak on Collection Due Process Cases at the NYU 8th Annual Tax Controversy Forum
06.24.2016

Charles Ruchelman to Speak on Repeal of TEFRA, New Partnership Tax Examination, and Collection Statute at D.C. Bar Panel
from 12:00 pm to 2:00 pm
06.23.2016

Christopher Rizek to Speak on Administrative Procedure Act at Virginia Conference on Federal Taxation
06.03.2016

Charles Ruchelman to Speak on New Tax Laws Relating to IRS Examination of and Tax Collection from Partnerships at AICPA Webinar

1:00 pm - 2:30 pm ET

05.16.2016

Mark Matthews to Speak on How Non-Compliant Clients Can Deal with the IRS at Transcontinental Trust: International Forum 2016

05.09.2016

Niles Elber to Speak on IRS Criminal Investigations at ABA 2016 May Meeting

9:05 AM

05.07.2016

Scott Michel to Speak on the United States as a Tax Haven Destination at ABA 2016 May Meeting

10:45 AM

05.07.2016

Matthew Hicks and Mark Matthews to Speak on Civil & Criminal Tax Penalties' Subcommittee at 2016 ABA May Meeting

05.07.2016

Mark Allison to Speak on Litigating Partnership Tax Cases Under the New Partnership Tax Rules at ABA 2016 May Meeting

4:40 pm

05.06.2016

Mark Allison to Speak on Litigation and the Fines, Penalties, and Costs to Settle at ABA 2016 May Meeting

3:45 pm - 4:30pm

05.06.2016

Charles Ruchelman to Speak on Litigating Partnership Tax Cases Under the New Partnership Tax Rules at ABA 2016 May Meeting

05.06.2016

Mark Allison to Speak on Partnerships at 2016 Nashville TEI Spring Seminar

05.05.2016

Clark Armitage and Kirsten Burmester to Speak on Issues Filing Master & Local Files Under Action 13 at TEI 2016 U.S. International Tax Seminar - BEPS is Now

04.29.2016

Clark Armitage to Speak on New US Transfer Pricing Developments at 4th Annual USD Transfer Pricing Symposium

04.28.2016

Charles Ruchelman to Speak on New Tax Laws Relating to IRS Examination of and Tax Collection from Partnerships at Bloomberg BNA Webinar

11:00 am - 12:30 pm ET.

04.21.2016

David Rosenbloom to Speak at 2016 NYU/KPMG Tax Lecture

04.19.2016

Christopher Rizek to Speak on Tax Practitioner Regulations & Ethics at Florida Tax Institute
03.30.2016

David Rosenbloom to Speak on BEPS Project at Sugarman Tax Lecture Hosted by Case Western Reserve University
03.29.2016

Scott Michel to Speak on Criminalization of Tax Violations at 16th Annual US-Europe Tax Planning Strategies Conference
03.17.2016

Christopher Rizek to Speak at Practising Law Institute 2016 Tax Penalties Conference
03.14.2016

Mark Matthews to Speak on Investigation Stage of Criminal Tax at Federal Bar Association Tax Law Conference
03.04.2016

Christopher Rizek to Speak on Administrative Procedure Act at Federal Bar Association Tax Law Conference
03.04.2016

Scott Michel to Speak on Recent Expansion of Criminal Tax Enforcement at ABA 30th Annual National Institute on White Collar Crime
03.02.2016

Clark Armitage and Kirsten Burmester to Speak on Mitigating Risk and Disputes Using APAs at TP Minds Transfer Pricing Summit Americas
02.23.2016

Mark Matthews to Speak on Voluntary Disclosure at Private Client Forum Americas Bermuda
02.10.2016

Charles Ruchelman to Speak with House Ways & Means Staffers on Repeal of TEFRA, New Partnership Tax Examination, and Collection Statute at D.C. Bar Panel
02.02.2016

Mark Allison to Speak on Tax Court Litigation (Post-Trial) at ABA Tax Section 2016 Midyear Meeting
01.30.2016

Christopher Rizek to Speak on Ethical Issues and Setting Engagement Terms at ABA Tax Section 2016 Midyear Meeting
01.29.2016

Victor Jaramillo to Speak on FATCA at ABA Tax Section Meeting
01.29.2016

Charles Ruchelman, Jonathan Brenner, and Rachel Partain to Speak on New Corporate Tax Law at Bloomberg BNA Webinar
01.26.2016

Niles Elber to Speak at ABA Criminal Tax Fraud and Tax Controversy Conference
12.10.2015

Scott Michel to Speak at ABA Criminal Tax Fraud and Tax Controversy Conference
12.10.2015

Mark Matthews to Speak at the Annual LITC Grantee Conference
12.09.2015

Christopher Rizek to Speak at 13th Biennial Parker Fielder Oil & Gas Tax Conference
11.20.2015

Mark Matthews to Speak on U.S. Global Tax Enforcement
11.18.2015

Christopher Rizek to Speak at the 61st Annual William & Mary Tax Conference Panel
11.13.2015

Mark Matthews to Speak at the 2015 Legal Week International Private Client Forum
11.12.2015

Christopher Rizek to Speak at NYU 74th Institute on Federal Taxation Panel
10.29.2015

Scott Michel to Speak at NYU 74th Institute on Federal Taxation Panel
10.25.2015

Mark Allison to speak at NYU 74th Institute on Federal Taxation Panel
10.25.2015

Clark Armitage to Moderate Government Panel on MAP Issues at National Foreign Trade Council Meeting
10.22.2015

Christopher Rizek to Speak at Southern Federal Tax Institute Panel
10.19.2015

Scott Michel to Moderate Q&A Session with DOJ Assistant Attorney General
10.16.2015

Scott Michel to Chair International Tax Enforcement Conference
10.16.2015

Christopher Rizek to Speak at ALI Tax Controversy Program
10.09.2015

Mark Allison to Speak on Examinations of TEFRA Partnership
10.08.2015

Scott Michel to Speak on Fixing Common Tax Problems
10.08.2015

Christopher Rizek to Chair Tax Controversy CLE
10.08.2015

Christopher Rizek to Speak at Tax Analysts' Conference
09.22.2015

Niles Elber to Speak on Aggressive Audit Techniques
09.19.2015

Christopher Rizek to Speak on Circular 230 §10.36
09.18.2015

David Rosenbloom to Speak on U.S. Tax Developments
09.18.2015

David Rosenbloom to Speak at BEPS/CTR III Conference
09.17.2015

David Rosenbloom to Speak at CET Inaugural Conference
09.17.2015

Scott Michel and David Rosenbloom to Speak on Tax Policy in the U.S.
09.09.2015

Scott Michel and David Rosenbloom to Host Panel on 2015 Offshore Enforcement
09.01.2015

David Rosenbloom to Speak at the Instituto Brasileiro de Direito Tributario
08.20.2015

Mark Matthews to Speak on Compliance Initiatives and Voluntary Disclosure
08.14.2015

Victor Jaramillo to Speak at the Latino Tax Professionals Association's 2015 National Convention
08.05.2015

Victor Jaramillo to Speak on International Compliance and FBARS
08.04.2015

Neal Kochman to Speak at Basics of International Taxation Seminar
07.22.2015

David Rosenbloom to Speak on Tax Treaties
07.21.2015

Kirsten Burmester to Speak on Mastering Form 3520 Webinar Panel
07.16.2015

David Rosenbloom to Speak on the U.S. Reaction to BEPS
07.02.2015

David Rosenbloom to Speak at Heidelberg University
07.01.2015

David Rosenbloom to Speak at the University of Würzburg
06.30.2015

Niles Elber to Speak on Offshore Enforcement
06.29.2015

David Rosenbloom to Present Student Lecture at the University of Düsseldorf
06.25.2015

David Rosenbloom to Speak at the University of Düsseldorf
06.24.2015

David Rosenbloom to Speak at Max Planck Institute for Tax Law and Public Finance
06.22.2015

Scott Michel to Speak at 2015 Annual Tax Section Meeting
06.19.2015

Patricia Lewis to Speak at Global Transfer Pricing Conference
06.12.2015

Scott Michel to Co-Chair 7th Annual Tax Controversy Forum
06.05.2015

Christopher Rizek to Serve on Planning Committee for 7th Annual Tax Controversy Forum
06.05.2015

David Rosenbloom to Speak at Global BEPS Conference
05.26.2015

Christopher Rizek to Speak at 2015 U.S. Tax Court Judicial Conference
05.21.2015

Mark Allison to Speak at 2015 Nashville TEI Spring Seminar
05.20.2015

Mark Matthews to Speak on Pro Bono & Tax Clinics Panel
05.09.2015

Mark Allison to Chair Court Procedure and Practice Roundtable Discussion
05.08.2015

Mark Allison to Speak on Court Procedure and Practice Panel
05.08.2015

Clark Armitage and Patricia Lewis to Speak at 2015 API Federal Tax Forum
04.28.2015

Clark Armitage to Moderate Current TP Litigation Panel
04.23.2015

David Rosenbloom to Speak on 15th Annual Tax Lecture Series
04.21.2015

Christopher Rizek to Speak on Ethics and Professionalism CLE Webinar
04.08.2015

Christopher Rizek to Speak on UVA Tax Study Group Panel
03.27.2015

Christopher Rizek to Speak on Special Rules for Professionals Panel
03.20.2015

David Rosenbloom and Stafford Smiley to Teach LL.M. Program in International Tax Law
03.20.2015

Mark Matthews to Speak on the Status of OVDP Programs
03.12.2015

Christopher Rizek to Speak on Refund Litigation Panel
03.06.2015

Patricia Lewis to Moderate a Panel Discussion at the 2015 IFA USA Conference
02.26.2015

Clark Armitage to Speak on Transfer Pricing Controversy and Alternative Dispute Resolution
02.25.2015

Scott Michel to Speak on Civil and Criminal Offshore Disclosure Panel
02.24.2015

Clark Armitage to Speak at TP Minds Americas 2015
02.23.2015

Clark Armitage to Speak at FEI Committee on Taxation Meeting
02.20.2015

David Rosenbloom to Discuss the Base Erosion and Profit Shifting Project
02.03.2015

David Rosenbloom and Victor Jaramillo to Speak at the University of Geneva
02.02.2015

Neal Kochman to Speak on Transfer Pricing Panel
01.30.2015

Mark Allison to Speak on Court Procedure and Practice Panel
01.30.2015

Christopher Rizek to Speak on Ethical Problems for Young Lawyers
01.30.2015

David Rosenbloom to Present at the Vienna University of Economics and Business
01.19.2015

Niles Elber to Speak at ABA's Annual Tax Fraud & Tax Controversy Conference
12.12.2014

Clark Armitage to Speak at Annual Institute on International Taxation
12.11.2014

Mark Matthews to Moderate on IRS Criminal Investigation Roundtable
12.11.2014

Scott Michel to Moderate Criminal Tax Fraud and Tax Controversy Panel
12.11.2014

Christopher Rizek to Speak on Tax Professionals and Malpractice
12.04.2014

David Rosenbloom to Speak at The Instituto Tecnológico Autónomo de México
11.21.2014

Christopher Rizek to Speak on Ethical Issues for Tax Practitioners
11.20.2014



Mark Allison to Speak on Civil & Criminal Tax Controversy Panel
11.16.2014

Christopher Rizek to Speak at FBA's Insurance Tax Conference
11.13.2014

David Rosenbloom to Speak on U.S. Tax Law
11.12.2014

David Rosenbloom to Speak at Copenhagen Business School's Tax Conference
11.12.2014

Christopher Rizek to Speak on Civil Tax Penalties
11.07.2014

Mark Matthews to Speak on Key International Data Collection Programs
11.06.2014

Mark Matthews to Speak on Government Use of Data
11.06.2014

Clark Armitage to Speak at Georgetown University's Transfer Pricing Symposium
11.06.2014

David Rosenbloom to Speak on U.S. Taxation of Foreign Corporations Business Profits
11.05.2014

Mark Matthews to Speak on Recent Developments in International Criminal Tax
10.31.2014

Mark Allison to Speak at the TEI in Nashville
10.22.2014

Mark Matthews to Speak on Recent Developments in Compliance Initiatives
10.21.2014

Mark Allison to Speak on Tax Controversy and Litigation Updates
10.19.2014

Christopher Rizek to Speak on Tax Court Procedures
10.17.2014

Mark Allison to Speak on Tax Court Procedures Panel
10.17.2014

Scott Michel and David Rosenbloom to Host Panel on 2014 Offshore Enforcement
10.13.2014

Christopher Rizek to Moderate Luncheon Program on Ethical Issues for Lawyers
10.01.2014

Mark Matthews to Speak on DOJ Procedures
09.20.2014

Niles Elber to Moderate 2014 OVDP and Streamlined Procedures Panel
09.20.2014



Mark Allison to Speak at 2014 ABA Joint Fall CLE Meeting
09.19.2014

Patricia Lewis to Moderate Transfer Pricing Panel
09.19.2014

Mark Allison to Chair Court Procedure and Practice Discussion
09.19.2014

Clark Armitage to Speak at Duke University's Transfer Pricing Program
09.18.2014

David Rosenbloom to Speak on International Taxation
08.22.2014

David Rosenbloom to Speak at First International Tax Forum
08.22.2014

David Rosenbloom to Speak on Cross-Border Taxation
08.21.2014

Niles Elber to Speak on Criminal Sentencing Webinar Panel
07.30.2014

Patricia Lewis to Discuss Transfer Pricing Risks at National Conference
07.23.2014

Christopher Rizek and Rachel Partain to Speak on Circular 230 Webinar
07.16.2014

Scott Michel to Speak on Offshore Tax Compliance
07.10.2014

Mark Matthews to Speak at Annual Income Tax Seminar
06.26.2014

Scott Michel to Moderate Panel on U.S. Global Tax Enforcement Priorities
06.24.2014

Scott Michel to Serve as Moderator for 6th Annual Tax Controversy Forum
06.20.2014

Mark Allison to Speak at ABA Program on Attorney-Client Privilege
06.18.2014

Mark Matthews to Speak on Global Private Wealth Industry
06.18.2014

Mark Matthews to Speak on Information Exchange and Privacy
06.18.2014

Mark Matthews to Speak at 29th Annual Transcontinental Trusts Conference
06.17.2014

How Many Shades of Grey? Current Ethical Issues for Tax Professionals
06.11.2014

Christopher Rizek to Speak at FBA's 26th Annual Insurance Tax Seminar
05.30.2014

Mark Allison to Speak at Tax Executive Institute IRS Audit and Appeals Seminar
05.22.2014

Mark Allison to Chair Court Procedure & Practice Committee
05.09.2014

Christopher Rizek to Speak at ABA Section of Taxation May Meeting
05.09.2014

Mark Allison to Chair Roundtable Discussion at ABA May Meeting
05.09.2014

Clark Armitage to Speak at ABA May Meeting
05.09.2014

Mark Allison to Moderate Roundtable Discussion at ABA May Meeting
05.09.2014

Mark Allison to Speak at U.S. Tax Court Program
05.01.2014

Mark Allison to Speak at Columbia University Undergraduate Law Review Launch Event
04.30.2014

Clark Armitage to Discuss APMA Program at International Conference
03.27.2014

Christopher Rizek to Participate in Tax Analysts' Discussion on the IRS's Readiness for Adopting a Taxpayer Bill of Rights
03.27.2014

Clark Armitage to Moderate Panel at Transfer Pricing Symposium
03.27.2014

Scott Michel Co-Chairs ABA's International Tax Enforcement Conference
03.18.2014

Mark Matthews to Speak at 28th Annual National Institute on White Collar Crime
03.06.2014

Mark Matthews to Speak at ACAMS Conference
03.06.2014

Mark Matthews to Speak at FBA's 2014 Tax Law Conference
02.28.2014

Scott Michel and Mark Matthews to Co-Chair Concurrent Symposia at FBA Tax Law Conference
02.28.2014

Clark Armitage to Moderate APA Panel at 2014 Transfer Pricing Summit
02.19.2014

Patricia Lewis and Clark Armitage to Moderate APA Workshop at 2014 Transfer Pricing Summit
02.18.2014

Patricia Lewis Chairs Panel on APMA Revenue Procedures
02.12.2014

David Rosenbloom to Speak at IFA/CTF Treaty Shopping Conference - Toronto
02.05.2014

David Rosenbloom to Serve as Guest Speaker for IFA/CTF Conference
02.05.2014

David Rosenbloom to Speak at IFA/CTF Treaty Shopping Conference - Calgary
02.03.2014

Christopher Rizek to Speak at TEI Tax Program in Texas
02.03.2014

Niles Elber to Moderate Panel on the Latest Developments in Offshore Opt Outs and Examinations at ABA 2014
Midyear Meeting
01.25.2014

David Rosenbloom to Speak at Legal Affairs Group Luncheon
01.15.2014

Scott Michel Co-Chairs ALI CLE Program "Hot Topics for Accountants & Tax Lawyers: Tax Returns, Advice, &
Examination"
12.16.2013

Mark Matthews to Speak on Criminal Tax Practice Tips and Strategies
12.13.2013

Charles Ruchelman to Speak on D.C. Bar Panel
12.12.2013

Mark Matthews to Speak at ABA Criminal Tax Fraud and Tax Controversy Conference
12.12.2013

Patricia Lewis to Speak at the IRS-GWU International Tax Conference 2013
12.12.2013

Scott Michel to Moderate Panel at ABA Criminal Tax Fraud and Tax Controversy Conference
12.12.2013

Scott Michel to Speak at University of Texas Annual Taxation Conference
12.04.2013

Christopher Rizek to Speak at the 72nd Institute on Federal Taxation
11.21.2013

Mark Matthews to Speak at the 22nd International Tax and Trust Summit
11.19.2013

Scott Michel to Speak at the 72nd Institute on Federal Taxation in San Francisco
11.17.2013

Stafford Smiley to Speak at Moscow State Law Academy
10.25.2013

Mark Matthews to Speak at University of San Diego School of Law - Procopio International Tax Institute
10.24.2013

Mark Matthews to Speak on Corporate Compliance
10.24.2013

Stafford Smiley Speaks On Tax Reform at the Russian IFA
10.23.2013

Mark Matthews Presents Tax Program at Southern Federal Tax Institute
10.23.2013

Scott Michel to Speak at the 72nd Institute on Federal Taxation in New York
10.20.2013

Mark Allison Discusses International Tax Best Practices
10.18.2013

Mark Allison Discusses Tax Shelter Cases
10.18.2013

Mark Allison Chairs TEFRA Panel at ABA Meeting
10.18.2013

Mark Matthews to Speak at the Tax Executive Institute Monthly Luncheon
10.17.2013

Stafford Smiley to Speak at the 2nd Annual Conference of the Moscow State Institute for Law
10.17.2013

Scott Michel to Speak on Developments in Offshore Tax Compliance
10.11.2013

Scott Michel to Speak at Annual Advanced ALI CLE Course
10.11.2013

Scott Michel to Speak at Swiss-American Chamber of Commerce Panel Meeting
09.26.2013

Mark Allison to Speak at the International Forum of Administration and Tax Justice
09.26.2013

Mark Matthews to Speak at Atlanta Tax Forum
09.23.2013

Stafford Smiley to Speak at American Chamber of Commerce in Poland
09.20.2013

Mark Allison to Speak on Monthly Conference Call for ABA Tax Administrative Practice Committee
Subcommittee on IRS Liaison Activities
09.18.2013

Scott Michel and David Rosenbloom to Speak at IFA Copenhagen 2013
08.26.2013

Mark Matthews to Speak at Anti-Fraud & Financial Crimes Conference
07.08.2013

Scott Michel to Speak at FATCA Seminar in Kuwait City
06.17.2013

Charles Ruchelman to Speak at 65th Annual Virginia Conference on Federal Taxation
06.07.2013

Niles Elber and Mark Matthews to Speak at 12th Annual North Carolina/South Carolina Tax Section Workshop
05.24.2013

Niles Elber to Speak on Recent Developments in the Criminal and Civil, IRS Investigations and Practices
05.11.2013

H. David Rosenbloom Presents Lecture Series in Italy
05.06.2013

Clark Armitage Discusses Transfer Pricing Developments
05.01.2013

Charles Ruchelman to Present at COFC Program
04.23.2013

David Rosenbloom Speaks at Tax Lecture Series on Tax Planning for U.S Inbound Investment
04.18.2013

Mark Matthews to Speak on Criminal Tax Enforcement Hot Topics
03.20.2013

Scott Michel and Mark Matthews to Speak at 37th Annual Tax Law Conference
03.01.2013

Clark Armitage to Cover Transfer Pricing at International Conference
03.01.2013

H. David Rosenbloom to Speak at the 2013 International Taxation Conference
03.01.2013

Patricia Lewis to Chair Panel at 37th Annual Tax Law Conference
03.01.2013

Niles Elber and Charles Ruchelman to Speak at DC Bar Tax Section Panel in Washington, D.C.
02.26.2013

Charles Ruchelman to Present at the Federal Bar Association Section of Taxation Program
02.25.2013

H. David Rosenbloom to Speak at 75th Anniversary of the International Fiscal Association
02.02.2013

Niles Elber to Speak on Important Developments in Civil and Criminal Tax Penalties
01.26.2013

Mark Allison to Speak at ABA Tax Section Meeting in Orlando
01.25.2013

Mark Matthews to Speak at ABA Seminar
01.16.2013

H. David Rosenbloom to Speak at the University of London
01.16.2013

Charles Ruchelman to Speak at U.S. Tax Court CLE Program
12.11.2012

Scott Michel to Speak at ABA Criminal Tax Fraud and Tax Controversy 2012 Meeting
12.07.2012

Christopher S. Rizek to Speak at 37th Annual Insurance Tax Conference
12.06.2012

Niles Elber to Speak at ABA Criminal Tax Fraud and Tax Controversy 2012 Meeting
12.06.2012

Mark E. Matthews to Speak at ABA Criminal Tax Fraud and Tax Controversy 2012 Meeting
12.06.2012

Christopher S. Rizek to Speak at The University of Texas at Austin School of Law's 60th Annual Taxation
Conference
12.05.2012

Niles Elber, Matthew Hicks, and Michael Pfeifer to Present Program to Mid-Atlantic STEP Members
12.03.2012

H. David Rosenbloom to Speak at the Wall Street Tax Association
11.26.2012

Mark Matthews to Speak at OffshoreAlert Conference on FATCA
11.26.2012

Christopher Rizek to Speak at NYU Institute on Federal
11.15.2012

Scott Michel to Speak at NYU Institute on Federal
11.11.2012

Scott D. Michel & H. David Rosenbloom to Speak at ABA Section of Taxation's Conference on International Tax
Enforcement
11.08.2012

Scott Michel to Speak at Tulane Tax Institute
10.31.2012

H. David Rosenbloom to Speak at Mumbai Law Firm
10.30.2012

H. David Rosenbloom to Speak at NYU-CTL US International Taxation Conference: Issues For The Years Ahead
10.23.2012

Scott Michel to Speak at UCLA Extension 2012 Annual Tax Controversy Institute
10.17.2012

H. David Rosenbloom to Speak at Vienna University of Economics and Business Tax Governance Conference
09.20.2012

Niles Elber to Speak on Civil and Criminal Tax Penalties
09.15.2012

Christopher Rizek to Moderate Panel at 2012 ABA Joint Fall Meeting
09.14.2012

Scott Michel to Speak on Developments in Offshore Tax Compliance
08.24.2012

Patricia G. Lewis to Chair Panel at National Association for Business Economics Transfer Pricing Symposium
07.31.2012

Christopher Rizek to Speak at the 2012 TEI Region VII Conference
06.27.2012

Scott Michel to Speak at the NYU 4th Annual Tax Controversy Forum
06.15.2012

Christopher Rizek to Moderate Panel for 2012 ABA May Meeting
05.11.2012

Mark Allison to Speak on Motions in Limine
05.11.2012

Scott Michel to Speak at Small Business Practitioners Tax Conference
05.03.2012

Scott Michel to Answer Tax Controversy Questions
05.03.2012

Mark Matthews to Speak at AICPA Conference on Tax Controversy and Small Business Practitioners Tax Conference
05.02.2012

Mark Matthews to Speak on Sensitive Issue Examinations
05.02.2012

Mark Allison to Speak on Federal Tax Disputes
05.01.2012

Scott Michel and Niles Elber to Speak at The J. Nelson Young Tax Institute
04.26.2012

Niles Elber to Moderate Panel at 2012 ABA Midyear Meeting
02.18.2012

Niles Elber to Report on Sentencing Guidelines at ABA Conference
02.18.2012

Mark Allison to Moderate Parallel Civil Tax Litigation and Criminal Investigations Panel
02.17.2012

Clark Armitage Discusses Cost Sharing at D.C. Bar Program
02.01.2012

Christopher Rizek to Speak at Taxpayer Reliance on "Formal" and "Informal" IRS Guidance
Taxation-A Section of the American Bar Association, Teleconference & Live Audio Webcast
Teleconference & Live Audio Webcast, 01.25.2012

H. David Rosenbloom Speaks About The Vodafone Decision Impact on US-India Investment Strategies in NYC
01.25.2012

Mark Allison Discusses Tax Litigation Trends
01.19.2012

Kirsten Burmester to Discuss International Civil and Criminal Penalties at DC Bar Program
01.03.2012

Patricia Lewis to Chair Panel on Transfer Pricing Enforcement
12.15.2011

Scott Michel to Speak on Ethical Issues in International Tax Practice
12.15.2011

Niles Elber and Scott Michel to Speak on Sentencing at ABA Conference
12.01.2011

Christopher Rizek to Speak at 70th NYU Institute on Federal Taxation
11.16.2011

Scott Michel to Speak at 70th Institute on Federal Taxation
11.15.2011

Scott Michel to Speak at UCLA's 27th Annual Tax Controversy Institute
UCLA Tax Controversy Institute
10.25.2011

Scott Michel to Speak on Panel at UCLA Tax Controversy Institute
UCLA Tax Controversy Institute
10.25.2011

Niles Elber and Matthew Hicks to Speak on Federal Sentencing Guidelines
10.22.2011

Christopher Rizek to Speak on Evidentiary Issues
10.21.2011

Christopher Rizek to Moderate Panel at 2011 ABA Joint Fall Meeting
10.21.2011

FBAR for the Fiduciary
10.18.2011

Stafford Smiley to Speak on The Foreign Account Tax Compliance Act (FATCA)
10.11.2011

Clark Armitage to Speak at D.C. Bar Program on Transfer Pricing
09.01.2011

Scott Michel and Niles Elber to Speak at IRS Nationwide Tax Forum
08.30.2011

Scott Michel to Speak on Offshore Tax Enforcement
08.19.2011

International Tax Policy: A Current View from the United States
Melbourne Law School's 2011 Annual Tax Lecture
08.03.2011

Clark Armitage to Speak on APA Issues
08.01.2011

Taxes and the Guidance Problem
07.22.2011

Christopher Rizek to Chair Roundtable Discussion for 2011 ABA May Meeting
05.06.2011

Christopher Rizek to Chair Court Procedure & Practice Committee
05.06.2011

Charles Ruchelman to Moderate Panel on Evidentiary Issues
05.06.2011

Circular 230 Important Revisions
02.23.2011

Christopher Rizek to Chair Court Procedure and Practice Committee
01.21.2011

Mark Allison Moderates Panel on Material Advisor Litigation
01.21.2011

Niles Elber to Speak on Sentencing Guidelines
01.21.2011

Christopher Rizek to Speak on Judicial Deference
01.21.2011

Scott Michel to Chair Committee at ABA's 2011 Midyear Meeting
01.21.2011

Christopher Rizek to Chair Court Procedure and Practice Roundtable
01.21.2011

Mark Allison to Speak on Section 6700 Litigation
01.21.2011

Scott Michel to Speak on Ethical Issues in International Tax Practice
12.10.2010

David Rosenbloom to Speak on Competent Authority Panel
12.09.2010

The 27th Annual National Institute on Criminal Fraud
12.02.2010

Christopher Rizek to Speak at TEI's Virginia Chapter Meeting
11.18.2010

David Rosenbloom to Speak on The UBS Saga
11.18.2010

Changing Supervisory and Regulatory Landscape
4th Annual Hedge Fund General Counsel Summit
10.04.2010

Tax in the Spotlight: Governments and Tax Directors under Pressure
EMEA Tax Summit, Prague, Czech Republic
09.29.2010

Niles Elber to Speak on Civil and Criminal Tax Penalties
09.25.2010

Scott Michel to Moderate Panel at 2010 ABA Joint Fall Meeting
09.25.2010

Christopher Rizek to Present Opening Remarks at 2010 ABA Joint Fall Meeting
09.24.2010

Christopher Rizek to Chair Roundtable Discussion
09.24.2010

Scott Michel to Chair Standards of Tax Practice Panel Discussions
09.24.2010

Taxation and Human Rights in Europe and the World
The 5th GREIT Conference, Badia Fiesolana (Florence), Italy
09.16.2010

Scott Michel to Speak on Offshore Tax Compliance
08.20.2010

13th Annual Advanced ALI-ABA Course of Study for Counselors to Foreign and U.S. Clients
American Law Institute - American Bar Association
08.19.2010

The Foreign Account Tax Compliance Act in 2010 Explored
08.05.2010

Straight from the Bench: How to Prepare Your Case for Tax Court

New York University Tax Controversy Forum

06.18.2010

Ethical Issues for Tax Practitioners

Virginia Conference on Federal Taxation

06.03.2010

Charles Ruchelman to Moderate The Employment Tax National Research Program: When, Where, and How

05.27.2010

Daniel Rosenbaum to Speak at The Employment Tax National Research Program: When, Where, and How

05.27.2010

Clark Armitage Discusses Dispute Resolution

04.01.2010

Daniel Rosenbaum to Present Webcast on the Employment Tax Compliance Program

03.25.2010

International Tax Issues Facing U.S. Taxpayers With Foreign Accounts and Their Financial Institutions

National University of Singapore

03.18.2010

Christopher Rizek to Speak at 34th Annual Tax Law Conference

03.05.2010

Charles Ruchelman to Moderate Panel at 34th Annual Tax Law Conference

03.05.2010

David Rosenbloom to Speak at 34th Annual Tax Law Conference

03.05.2010

Clark Armitage Speaks on the APA Process

03.01.2010

Scott Michel to Chair Tax Committee for 2010 ABA Midyear Meeting

01.22.2010

Christopher Rizek to Chair Panel for 2010 ABA Midyear Meeting

01.22.2010

Charles Ruchelman to Speak on the Stipulation Process

01.22.2010

Scott Michel to Speak on Ethical Issues in Whistleblower Claims

01.22.2010

Scott Michel to Speak on Issues in Whistleblower Claims

01.22.2010

Cono Namorato to Speak on Issues Surrounding the FBAR

01.14.2010

Mark Allison Discusses Tax Court Procedures at ABA Conference

01.11.2010

Scott Michel and Cono Namorato to Speak at The 26th Annual National Institute on Criminal Tax Fraud

12.03.2009

Litigating for the IRS: How It's Done and Where It Leads

U.S. Tax Court CLE, Washington, D.C.

11.20.2009

Brave New World of Tax Enforcement: UBS, International and Corporate Criminal Tax Issues

White Collar Practice Seminar - Pennsylvania Association of Criminal Defense Lawyers

11.13.2009

Clark Armitage Covers Competent Authority at Canadian Conference

11.01.2009

68th Institute of Federal Taxation

New York University

10.18.2009

FOIA - It Doesn't Hurt (And May Help) To Ask

2009 Joint Fall CLE Meeting - ABA Section of Taxation and Section of Real Property, Trust and Estate Law, Estate Division

09.24.2009

Mark Allison Chairs Statute of Limitations Panel

09.10.2009

Daniel Rosenbaum to Present Audio Conference on Federal Employment Tax Oversight

08.13.2009

Undeclared Foreign Accounts, Trusts and Estates: Implications of IRS Enforcement Actions

07.16.2009

Clark Armitage Discusses APA and Competent at Training Program

07.01.2009

Mark Allison Chairs Transferee Liability Panel at ABA Conference

01.10.2009

Mark Allison Discusses Jury Trials at ABA Event

09.10.2008

Mark Allison Talks Cross-Border Discovery at ABA Program

09.10.2007

Codification of Economic Substance: Its Potential Impact on Audits and Litigation

District of Columbia Bar Taxation Section - Tax Audits and Litigation Committee

DC Bar Conference; Washington, D.C., 05.17.2007

The Top Ten Things That Get Tax Lawyers into Trouble for Malpractice

ABA Tax Section, TaxLink Live

Teleconference, 04.11.2007

Best Practices

National Association of Bond Lawyers
Teleconference, 02.07.2007

Spotlight on Procedure: Privilege Claims Relating to Email Chains
ABA Section of Taxation Meeting
Hollywood, FL, 01.19.2007

Mark Allison Speaks on Section 162(f) at TEI Conference
10.24.2006

Christopher Rizek to Speak on Ethical Issues That Arise in Tax Transactional Practice
NYU's 65th Institute on Federal Taxation
The Grand Hyatt Park Avenue
Grand Central Station; New York, NY, 10.22.2006

The Intersection of FOIA and Tax Litigation with Emphasis on New Chief Counsel Notice 2006-16
District of Columbia Bar
Washington, D.C., 10.12.2006

Mark Allison Discusses Tax Shelter Litigation Trends at ABA Program
02.10.2006

Mark Allison Speaks on Expert Witnesses at ABA Conference
09.10.2004

PUBLICATIONS

Evaluating and Improving The Taxpayer Rights Provisions of the IRS Restructuring and Reform Act of 1998
Pittsburgh Tax Review, 03.16.2023

Entrepreneur or Hobbyist: Turning Losses Into a Win
Article | *Practical Tax Strategies Thomson Reuters*, 01.01.2023

IRS Takes Aim at Law Firms' Deferred Payment Arrangements for Contingency Cases
Tax Alert | 12.28.2022

IRS Announces It Will Start Following the Law (With Respect to Identifying Some Listed Transactions)
Procedurally Taxing, 12.09.2022

IRS to Issue Proposed Regulations Identifying Syndicated Conservation Easements as Listed Transactions
Tax Alert | 12.07.2022

What Do I Need to Know About the Corporate Transparency Act?
California Trusts and Estates Quarterly, 11.01.2022

Counterpoint: The IRS's First-Time Abatement Policy . . . Even Harsher Than You Realized
Article | *ABA Tax Times*, 08.30.2022

IRS Grants Penalty Relief for Certain 2019 and 2020 Returns
Tax Alert | 08.25.2022

Obtaining Refunds of Section 6707A and Section 6707 Penalties Paid for Not Properly Reporting Listed Transactions or Transactions of Interest (Including Notice 2007-83 and Notice 2016-66)
Tax Alert | 03.22.2022

Information Reporting Arbitrage: The New American Way
Article | *IFC*, 03.09.2022

What's the IRS Criminal Investigation Division Telling Us About Its Priorities and Update on the Erosion of the Attorney-Client Privilege in Tax Cases
Article | *ABA White Collar Crime Committee Newsletter*, 03.07.2022

The Enduring Value of Departures in a Post-Booker World
Article | *ABA White Collar Crime Committee Newsletter*, 03.07.2022

Taxpayer Defeats IRS Penalty in Tax Court for Conservation Easement Transaction
Tax Alert | 12.21.2021

IRS "Dirty Dozen" List Includes "Potentially" Abusive Use of U.S.-Malta Tax Treaty in Pension Plans
International Tax Alert | 08.17.2021

Yellen's Global Minimum Tax Push Likely to Crash and Burn
Article | *Roll Call Op-Ed*, 07.23.2021

IRS to Taxpayers: Do You Trust Me?
Article | *The Tax Advisor*, 07.21.2021

Justices' Nod To Preemptive Tax Challenges May Caution IRS
Article | *Law360*, 05.26.2021

Using Protected And Incorporated Cells To Provide Captive Insurance: Benefits And Considerations
Article | *IFC*, 05.12.2021

Is an Act 60 Taxpayer Required to Have a Transfer Pricing Study?
International Tax Alert | 04.28.2021

IRS to "Campaign" into Puerto Rico; How can Taxpayers Defend?
Tax Alert | 02.03.2021

The *Adams Challenge* Tax Court Decision Reinforces the Benefits of Foreign Taxpayers Filing Protective U.S. Returns
Tax Alert | 01.26.2021

INSIGHT: The 2020 Revision to the Internal Revenue Manual's Voluntary Disclosure Practice: More Consistency with Greater Risk
Article | *Bloomberg Tax: Daily Tax Report*, 01.12.2021

Are The IRS's New Terms Worth It
Article | *Captive Review*, 12.22.2020

U.S. Tax Enforcement – A New Decade Begins
IFC, 11.05.2020

IRS Kicks Off Post-*Altera* Audit Adjustments
Tax Alert | 09.21.2020

The IRS Resumes its Global High-Wealth Examination Program and Targets High Income Non-Filers
Tax Alert | 07.22.2020

Challenge to the Constitutionality of the ACA Raises NII Tax Refund Possibility
Tax Alert | 07.06.2020

TAX PRACTICE: A Silver Linings Guidebook: Corporate Planning for Coronavirus Losses
Article | *Tax Notes Federal*, 05.18.2020

INSIGHT: The IRS's Renewed Focus on Fraud-Implications for Tax Practitioners
Article | *Bloomberg Law*, 05.08.2020

IRS Will Continue Captive Insurance and Syndicated Conservation Easement Examinations Despite Covid-19
Pandemic
Tax Alert | 04.27.2020

Damage Mitigation: The IRS Helps Alleviate Effect of COVID-19 on U.S. and Foreign Residency
Tax Alert | 04.22.2020

Partnership Filing Relief
Tax Alert | 04.13.2020

Updated Filing and Payment Extensions Under Notice 2020-23
Tax Alert | 04.10.2020

Collateral Damage: Covid-19 and its Unintended Effect on U.S. Residency
Tax Alert | 04.01.2020

Abatement of Foreign Pension Trust Penalties
Tax Alert | 03.31.2020

Captive Soft Letter
Tax Alert | 03.31.2020

IRS Announces Tax Collection Easing and Payment Flexibility During COVID-19 Crisis
Tax Alert | 03.30.2020

The Impact of Notice 2020-18 on Information Returns
Tax Alert | 03.30.2020

CARES Act Offers Income Tax Relief for Business
Tax Alert | 03.27.2020

Interpreting the TCJA: Standing Up (With Reservations) for Treasury
Article | *Tax Notes Federal Letters to the Editor*, 01.27.2020

New Cryptocurrency Guidance
Tax Alert | 10.22.2019

Sharia Law Is Already Here - The IRS Must Respond
Article | *The Hill Op-Ed*, 10.18.2019

Financier Worldwide Annual Review: Transfer Pricing 2019 – United States
Article | *Financier Worldwide*, 10.07.2019

COMMENTARY & ANALYSIS: The TCJA and the Treaties

Article | *Tax Notes International Magazine*, 09.09.2019

Decrypting The New IRS Cryptocurrency Compliance Letters

Article | *Law360 Tax Authority*, 08.07.2019

Cryptocurrency Criminal Tax Cases Coming Soon

Tax Alert | 07.23.2019

Combating Aggressive Tax Planning Through Disclosure: A Comparison of U.S. and EU Rules Applicable to Tax Advisors

Article | *ABA Tax Times*, 06.14.2019

Deductibility of Illegal Payments, Fines, and Penalties

Book | *Bloomberg Tax 524-2nd Tax Management Portfolio*, 05.03.2019

Tax Problems Loom in the College Admissions Scandal

Tax Alert | 03.18.2019

EXPERT ANALYSIS: Planning For Partnership Representatives In The New Year

Article | *Law360*, 01.04.2019

The New Voluntary Disclosure Practice: A Fair Compromise?

Tax Alert | 12.03.2018

Year-End Updates on Partnership Representatives

Tax Alert | 11.06.2018

Navigating QBAI Quirks of the GILTI Regulations

Article | *Bloomberg Tax, Tax Management International Journal*, 11.05.2018

COMMENTARY & ANALYSIS: The BEAT and the Treaties

Article | *Tax Notes International Magazine*, 10.15.2018

Kumquat: The U.S. International Tax Issues

Article | *Tax Notes International Magazine*, 06.25.2018

EXPERT ANALYSIS: U.S. Owners of Foreign Trusts Face Increased IRS Scrutiny

Article | *Law360*, 06.21.2018

IRS Adds Foreign Trust Information Reporting to Compliance Campaign Program

Tax Alert | 06.01.2018

Mining for Meaning: An Examination of the Legality of Property Rights in Space Resources

Virginia Law Review, 05.01.2018

INSIGHT: Last Call for OVDP: Use It or Lose It

Article | *Bloomberg Tax: Daily Tax Report*, 04.20.2018

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