

## 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 miscomputed 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**

Criminal Tax Cases & White Collar Defense

International Tax

Private Client



## News & Insights

### NEWS

Caplin & Drysdale Attorneys are Recognized in 2023 *Chambers USA*  
06.01.2023

Scott Michel Comments in New York Times on NY Hush Money Case Involving Trump  
*New York Times*, 05.07.2023

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03.01.2023

Niles Elber Discusses Impact of IRS Receiving Billions in New Funding on Bloomberg Tax Talking Tax Podcast  
*Bloomberg Tax Talking Tax*, 01.12.2023

Scott Michel Joined KPCW's Mountain Money to Discuss the Inflation Reduction Act Allocating Billions to the IRS  
*KPCW's Mountain Money*, 01.09.2023

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*Tax Notes*, 10.11.2022

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*Bloomberg Tax*, 05.10.2022

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*Law360 Tax Authority*, 04.18.2022

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Niles Elber Weighs in on IRS Audits Involving Conservation Easements in POLITICO  
*POLITICO*, 01.20.2022

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*Bloomberg Law*, 12.03.2021

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*Tax Notes*, 11.17.2021

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*Captive Insurance Times*, 11.12.2021

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*Bloomberg Tax*, 11.10.2021

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*Bloomberg Law*, 08.16.2021

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*AMI Magazine*, 06.16.2021

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Victor Jaramillo Talks to The Independent on Tax Concerns for Prince Harry  
*The Independent*, 05.12.2021

7 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation May Meeting  
04.30.2021

Super Lawyers® Names Caplin & Drysdale Attorneys Among D.C.'s Most Prominent Practitioners  
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Clark Armitage and Dianne Mehany Weigh in on Act 20 and Act 22 Beneficiaries in Puerto Rico  
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*UVA Law*, 12.07.2020

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*Tax Notes*, 11.30.2020

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Caplin & Drysdale Welcomes Lauren Smith  
11.16.2020

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*The Wall Street Journal*, 10.05.2020

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*Tax Notes*, 08.28.2020

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6 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation Virtual May Meeting  
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*New York Times*, 04.24.2020

Mark Matthews Speaks to Law360 on IRS Redesign and Criminal Investigation Division  
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*Bloomberg BNA Daily Tax Report*, 06.05.2012

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*San Francisco Chronicle*, 07.21.2011

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

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*Bloomberg*, 12.29.2010

Scott Michel States Switzerland's Cantonal Banks Next Target of U.S. Tax Investigators  
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Christopher Rizek Comments on IRS Providing Industry-Specific Guidance for Tax Problems  
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*Tax Analysts, Eurasia Review, The Wall Street Journal*, 08.24.2010

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*Bloomberg, Schweizer Fernsehen*, 06.17.2010

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Christopher Rizek Comments on Circular 230 Revisions  
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Christopher Rizek Comments on IRS's Openness About Its Disciplinary Proceedings  
*Financial Adviser*, 05.24.2010

David Rosenbloom Comments on International Tax Policy  
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*Forexyard, Bloomberg, PRLog, FA Magazine, etc.*, 05.04.2010

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Delinquent Taxes  
*Committee on Oversight and Government Reform, The Washington Post, etc.*, 03.19.2010

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*World Radio Switzerland*, 10.16.2009

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*The New York Times*, 09.07.2009

New OPR Chief Ready to Get Tough  
*WebCPA*, 09.01.2009

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Press Releases | 03.26.2009

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Victor Jaramillo Co-Chairs Panels on Tax Issues with Computer Software at ABA U.S. and Latin America Tax Practice Trends Conference  
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Charles Ruchelman and Jonathan Black Discuss Captive Insurance Disclosure Regulations at DCIA Fall Forum  
Wilmington, DE, 10.18.2023

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

Victor Jaramillo Joins Steering Committee and Participates in Discussions at Cambridge Forum on  
International Tax & Disputes  
Cascais, Portugal, 05.24.2023 - 05.26.2023

Scott Michel Participates in Discussions at Cambridge Forum on International Tax & Disputes  
Cascais, Portugal, 05.24.2023 - 05.26.2023

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

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

Christopher Rizek Discusses Attorney-Client Privilege on CPA Webinar Series  
Virtual, 04.25.2023

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  
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Melissa Wiley Explores Sources of IRS Criminal Investigations at ABA Midyear Tax Meeting  
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Benjamin Eisenstat Analyzes False Claims Act 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  
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Melissa Wiley Explores How to Prepare for Corporate Transparency Act at Joint Estate Planning Council  
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Christopher Rizek Explores Ethical Issues at 33rd Annual Institute on Current Issues in International Taxation  
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Scott Michel Analyzes Ethical Issues with Constitutional and Common Law Privileges at ABA Criminal Tax Fraud  
and Tax Controversy Institute  
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Victor Jaramillo Discusses Enforcement Trends at New England IRS Representation Conference  
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Megan Wernke and Melissa Wiley Analyze Formula Clauses at MSBA Advanced Estate Planning Institute  
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Christopher Rizek and Melissa Wiley Address Ethics in the Post-COVID-19 Era at ABA Philadelphia Tax  
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Melissa Wiley Chairs Panel on Tax Controversy and Tax Litigation Updates at NYU 81st Institute on Federal Taxation – California

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Melissa Wiley Discusses Corporate Transparency Act at AICPA & CIMA National Tax & Sophisticated Tax Conference

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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

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Melissa Wiley Chairs Panel on Tax Controversy and Tax Litigation Updates at NYU 81st Institute on Federal Taxation – New York

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

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

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Victor Jaramillo Explores Recent Civil & Criminal Tax Penalties Developments at ABA Fall Tax Meeting

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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

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Melissa Wiley Addresses Corporate Transparency Act at Income Tax Seminar

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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

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Christopher Rizek Moderates Panel on Tax Collection Alternatives at International Conference on Taxpayer Rights

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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  
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Melissa Wiley Analyzes Corporate Transparency Act and New Beneficial Ownership Disclosure Rules on CTA  
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Niles Elber and Melissa Wiley Analyze IRS Examinations on Lorman Webinar  
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Amanda Leon Addresses The Corporate Transparency Act at TEI Midyear Conference  
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Niles Elber and Melissa Wiley Address Tax Return Preparers Being Under New Scrutiny on Strafford Webinar  
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Melissa Wiley Analyzes Tax Ethics at ABA Midyear Tax Meeting  
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Ross Sharkey Joins Panel on Trying a Civil Tax Fraud Case at ABA Criminal Tax Fraud & Tax Controversy Institute  
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Mark Matthews Moderates Panel on IRS Criminal Enforcement Priorities at ABA Criminal Tax Fraud & Tax  
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12.09.2021

Scott Michel Moderates Panel on IRS and DOJ Declining Prosecution at ABA Criminal Tax Fraud & Tax  
Controversy Institute  
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Scott Michel Addresses Ethical Issues in International Tax at IFA Winter International Tax Conference  
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12.09.2021

Scott Michel Discusses Whether Tax Leaks Bring More Audits and Investigations at D.C. Bar Program  
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Melissa Wiley Moderates Panel on Whether Tax Leaks Bring More Audits and Investigations at D.C. Bar Program  
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Victor Jaramillo Addresses Expatriation at U.S. and UK Tax and Estate Planning Conference  
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Robert Carney Presents on BBA Partnership Audit Rules at D.C. Bar Program  
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Melissa Wiley Moderates D.C. Bar Program on BBA Partnership Audit Rules  
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Christopher Rizek and Melissa Wiley Analyze Captive Insurance and Conservation Easements at AICPA National Tax Conference  
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Melissa Wiley Addresses How to Avoid and Defend Against Penalties at AICPA National Tax Conference  
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Melissa Wiley Explores Tax Controversy Issues at NYU 80th Institute on Federal Taxation  
11.15.2021

Christopher Rizek and Melissa Wiley Discuss Ethics Issues in COVID Era at ABA Philadelphia Tax Conference  
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Peter Barnes Moderates Panel on Issues Facing Tax Directors at ABA Philadelphia Tax Conference  
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Victor Jaramillo Addresses IRS Cryptocurrency Enforcement at Latino Tax Fest  
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Victor Jaramillo Addresses in Spanish IRS Cryptocurrency Enforcement at Latino Tax Fest  
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Victor Jaramillo Moderates Panel on John Doe Summonses and Crypto Compliance Gap at ABA Fall Tax Meeting  
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Benjamin Eisenstat Moderates Panel on Privacy at ABA Fall Tax Meeting  
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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  
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Mark Matthews Addresses New Frontiers in Tax Fraud at Berkeley Fraud Fest  
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Jonathan Black Analyzes Ethical and Penalty Issues at NYU Tax Controversy Forum

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

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

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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

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05.11.2021

Robert Carney Explores Taxing Wealth on Federalist Society Webinar

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

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

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Christopher Rizek Explores Ethical Obligations at ABA Midyear Tax Meeting

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

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

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

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

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

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

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

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

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Victor Jaramillo Addresses Reporting Foreign Accounts at Latino Tax Fest

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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

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08.04.2020

Clark Armitage Analyzes Transfer Pricing Insurance at 10th Annual NABE Transfer Pricing Symposium

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Niles Elber Moderates Panel on Recent Criminal Investigations on ABA Virtual 2020 May Tax Meeting

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Amanda Leon Explores Transfer Pricing Litigation on ABA Virtual 2020 May Tax Meeting

1:00 PM - 2:30 PM

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Niles Elber Addresses Evasion of Payment Prosecutions at FBA Tax Law Conference

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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

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02.01.2020

Victor Jaramillo Explores Cryptocurrency Issues at ABA 2020 Midyear Meeting

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

8:45 AM - 11:45 AM ET

05.11.2019

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

9:35 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

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

04.11.2019

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

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

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

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

11:45 AM - 12:45 PM

03.08.2019

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

Niles Elber Discusses Domestic Tax Enforcement at FBA Tax Law Conference

4:30 PM to 5:30 PM

03.07.2019

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

02.28.2019

Clark Armitage Discusses Practical APA Experiences at TP Minds Americas

2:00 PM ET - 2:40 PM ET

02.26.2019

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 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

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

3:10 PM ET

11.29.2018

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

2:20 PM

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 Moderates Panel on Offshore Voluntary Disclosure Program at ABA 2018 Fall Meeting

11:00 AM

10.06.2018

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

8:30 AM - 11:45 AM

10.06.2018

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

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

09.17.2018

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

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 Chairs Civil and Criminal Tax Penalties Committee Meeting at ABA Midyear Meeting  
8:30 AM - 11:45 AM  
05.12.2018



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

9:20 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 Discusses U.S. Tax Reform at University of Padova  
4:00 PM  
01.12.2018

David Rosenbloom Explores U.S. Tax Reform at Confindustria Vicenza  
11:00 AM  
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

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

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

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

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

2:00 PM - 3:30 PM

06.15.2017

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

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



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

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

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

Neal Kochman to Discuss Inbound and Outbound Transfer Pricing at PLI Conference

1:00 PM

09.20.2016

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

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

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

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

9:05 AM

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

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 Litigation and the Fines, Penalties, and Costs to Settle at ABA 2016 May Meeting  
3:45 pm - 4:30pm  
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

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

Mark Matthews to Speak on Investigation Stage of Criminal Tax 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

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

Christopher Rizek to Speak on Circular 230 §10.36  
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

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

Clark Armitage to Speak at Annual Institute on International Taxation  
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 at Copenhagen Business School's Tax Conference  
11.12.2014

David Rosenbloom to Speak on U.S. Tax Law  
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

Mark Allison to Speak on Tax Court Procedures Panel  
10.17.2014

Christopher Rizek to Speak on Tax Court Procedures  
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 at First International Tax Forum  
08.22.2014

David Rosenbloom to Speak on International Taxation  
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

Mark Allison to Chair Roundtable Discussion at ABA May Meeting  
05.09.2014

Christopher Rizek to Speak at ABA Section of Taxation 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

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

Clark Armitage to Discuss APMA Program at International Conference

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

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

02.28.2014

Mark Matthews to Speak at FBA's 2014 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

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

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

12.12.2013

Charles Ruchelman to Speak on D.C. Bar Panel

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 on Corporate Compliance

10.24.2013

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

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 at Annual Advanced ALI CLE Course  
10.11.2013

Scott Michel to Speak on Developments in Offshore Tax Compliance  
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

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

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

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

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 37th Annual Insurance Tax Conference  
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

Mark Matthews to Speak at OffshoreAlert Conference on FATCA  
11.26.2012

H. David Rosenbloom to Speak at the Wall Street Tax Association  
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 Report on Sentencing Guidelines at ABA Conference  
02.18.2012

Niles Elber to Moderate Panel at 2012 ABA Midyear Meeting  
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 Court Procedure & Practice Committee  
05.06.2011

Charles Ruchelman to Moderate Panel on Evidentiary Issues  
05.06.2011

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

Circular 230 Important Revisions  
02.23.2011

Christopher Rizek to Chair Court Procedure and Practice Roundtable  
01.21.2011

Mark Allison to Speak on Section 6700 Litigation  
01.21.2011

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

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 Chair Roundtable Discussion  
09.24.2010

Scott Michel to Chair Standards of Tax Practice Panel Discussions  
09.24.2010

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

Daniel Rosenbaum to Speak at The Employment Tax National Research Program: When, Where, and How  
05.27.2010

Charles Ruchelman to Moderate 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 Speak on Issues in Whistleblower Claims  
01.22.2010

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

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  
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Mark Allison Chairs Statute of Limitations Panel  
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Daniel Rosenbaum to Present Audio Conference on Federal Employment Tax Oversight  
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Clark Armitage Discusses APA and Competent at Training Program  
07.01.2009

Mark Allison Chairs Transferee Liability Panel at ABA Conference  
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Mark Allison Discusses Jury Trials at ABA Event  
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Mark Allison Talks Cross-Border Discovery at ABA Program  
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