

Tax Disputes & Tax Litigation

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

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

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

Areas of Focus

THE TAX CONTROVERSY PROCESS

Planning for an IRS Audit

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

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

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

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

Rectifying Prior Tax Errors and Tax Non-Compliance

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

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

Navigating IRS Audits

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

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

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

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

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

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

Handling IRS Administrative Appeals

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

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

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

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

Litigating Tax Cases Though Trial and Appeal

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

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

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

Representative engagements include:

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

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

SPECIALIZED EXPERTISE

Sensitive and Potential Fraud Issues on Audit

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

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

Defending International and FBAR Reporting and Penalty Cases

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

These types of cases include:

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

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

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

Controversies Involving Interest on Federal Taxes

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

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

Working with the Taxpayer Advocate Service (TAS)

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

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

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

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

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

Advising Tax Professionals

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

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

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

IRS Office of Professional Responsibility (OPR) Matters

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

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

Reportable Transaction Compliance and Defense

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

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

Related Practices

Criminal Tax Cases & White Collar Defense

International Tax

Private Client

News & Insights

NEWS

Benjamin Eisenstat Speaks to Bloomberg on Reporting Penalties After Tax Court Ruling
Bloomberg Law, 11.27.2023

Caplin & Drysdale Recognized as a Top-Tier Firm by *U.S. News – Best Law Firms*
Awards & Rankings | 11.02.2023

Caplin & Drysdale Elects Two New Members
Firm Release | 10.01.2023

Niles Elber Comments on IRS Shifting Focus to HNW Individuals and Partnerships
Accounting Today, 09.26.2023

Super Lawyers® New York Ranks Mark Allison Among Top Tax Lawyers
Awards & Rankings | 09.22.2023

Niles Elber Comments on Recent IRS Enforcement Efforts
Financial Planning, 09.14.2023

Scott Michel Speaks to Law360 on Becoming Chair of ABA Tax Section
Law360, 08.17.2023

Scott Michel Named Chair of the ABA Section of Taxation
Press Release | 08.14.2023

Niles Elber Speaks to Law360 on FinCEN Reporting Rules for Small Businesses
Law360 Tax Authority, 08.08.2023

Bloomberg Tax Quotes Victor Jaramillo on Cryptocurrency Appeals Case
Bloomberg Tax, 07.25.2023

Caplin & Drysdale Attorneys Recognized by *Chambers High Net Worth* Ranking as Leaders in Tax and Private Wealth Law
Awards & Rankings | 07.20.2023

Charles Ruchelman Comments on Recent IRS Enforcement Statement
The Messenger, 07.18.2023

Leila Carney Speaks to Tax Notes on IRS Funding Targeting Enforcement
Tax Notes, 07.17.2023

Niles Elber Weighs in on 2023 FBAR Cases in Law360
Law360, 07.07.2023

2023 Legal 500 Recognizes Caplin & Drysdale Attorneys
Awards & Rankings | 06.27.2023

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

Niles Elber Comments on New Corporate Transparency Act Rules in *Accounting Today*
Accounting Today, 05.30.2023

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

Bloomberg Tax Quotes Benjamin Eisenstat and Jonathan Black on Tax Court Ruling Potentially Increases Penalty Challenges
Bloomberg Tax, 04.27.2023

Super Lawyers® Recognizes Caplin & Drysdale Attorneys in 2023 Edition Awards & Rankings | 04.24.2023

Caplin & Drysdale Attorneys Contribute to ABA State Tax Guide Helping Military Members Using VITA
04.03.2023

Victor Jaramillo Comments on FBAR Refund Claims in Bloomberg Tax
Bloomberg Tax, 03.20.2023

Bloomberg Tax Quotes Victor Jaramillo on Supreme Court Ruling on Non-Willful FBAR Violators
Bloomberg Tax, 03.03.2023

Victor Jaramillo Weighs in on Supreme Court Decision on Non-Willful FBAR Violators in Tax Notes
Tax Notes, 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

U.S. News – Best Law Firms Recognizes Caplin & Drysdale as a Top-Tier Firm Awards & Rankings | 11.03.2022

Tax Notes Quotes Scott Michel on Attorney-Client Privilege
Tax Notes, 10.11.2022

Caplin & Drysdale Elects Two New Members
10.03.2022

Financial Planning Quotes Niles Elber on Upcoming Decision in *Bittner v. United States*
Financial Planning, 10.03.2022

Washingtonian Magazine Names Seven Caplin & Drysdale Attorneys to Top Lawyer Lifetime Achievement List
09.01.2022

Mark Matthews Comments on Potential IRS Enforcement Drop Due to Training New Agents in Law360
Law360 Tax Authority, 08.24.2022

“Best Lawyers in America” Names Caplin & Drysdale Attorneys as Leaders in Their Field Awards & Rankings | 08.18.2022

Chambers High Net Worth Guide Lists Caplin & Drysdale Attorneys as Leaders in Tax and Private Wealth Law Awards & Rankings | 07.18.2022

Victor Jaramillo Talks to Bloomberg Tax on Foreign Account Penalties
Bloomberg Tax, 06.22.2022

Caplin & Drysdale Attorneys Recognized by Legal 500 Awards & Rankings | 06.10.2022

Chambers USA Recognizes Caplin & Drysdale Attorneys in 2022 Edition Awards & Rankings | 06.03.2022

Victor Jaramillo and Jonathan Black Comment on *Flora* Rule in Bloomberg Tax *Bloomberg Tax*, 05.10.2022

Super Lawyers® Recognizes Caplin & Drysdale Attorneys Among Washington's Top Lawyers Awards & Rankings | 05.02.2022

Mark Matthews Talks to Law360 on IRS Preparer Regulation Program *Law360 Tax Authority*, 04.18.2022

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

Mark Allison Comments on IRS Enforcement in Tax Notes *Tax Notes*, 01.05.2022

Mark Matthews Weighs in on *Zuhovitzky v. UBS* in Tax Notes *Tax Notes*, 01.03.2022

Victor Jaramillo Talks to Law360 on an International Tax Case To Watch in 2022 *Law360*, 01.03.2022

Scott Michel Talks to Bloomberg Law on Offshore Bank Accounts *Bloomberg Law*, 12.03.2021

Victor Jaramillo Comments on Recent Government Win on FBAR Penalties in Bloomberg Law *Bloomberg Law*, 12.02.2021

Tax Notes Quotes Christopher Rizek on Tax Shelters *Tax Notes*, 11.17.2021

Christopher Rizek Weighs in on Microcaptive Cases for Litigation in Tax Notes *Tax Notes*, 11.15.2021

Captive Insurance Times Reports on Firm's Recent Captive Insurance Case *Captive Insurance Times*, 11.12.2021

Bloomberg Tax Writes Article on Firm's Recent Captive Insurance Case *Bloomberg Tax*, 11.10.2021

Christopher Rizek Talks to Tax Notes on Microcaptive Litigation *Tax Notes*, 11.08.2021

Caplin & Drysdale Earns 10 Tier 1 Practice-Area Rankings in 12th Edition of *U.S. News – Best Law Firms*® Awards & Rankings | *U.S. News & World Report*, 11.04.2021

Mark Matthews Weighs in on Tax Enforcement Announcements in Tax Notes *Tax Notes*, 11.02.2021

Super Lawyers® Recognizes Caplin & Drysdale Attorneys in New York Awards & Rankings | *Super Lawyers*®, 10.01.2021

Caplin & Drysdale Welcomes Eleanor VanderMeulen
09.29.2021

Victor Jaramillo Comments on Cryptocurrency Crackdown in Bloomberg Law
Bloomberg Law, 08.24.2021

Caplin & Drysdale Attorneys Listed as "Best Lawyers In America"
Awards & Rankings | 08.19.2021

Bloomberg Quotes Elizabeth Stevens on Fee Reimbursement
Bloomberg Law, 08.16.2021

Mark Matthews Talks to Law360 on Recent IRS Enforcement of FBAR Penalties
Law360 Tax Authority, 08.06.2021

Peter Barnes Weighs in on Digital Taxes and Global Tax Agreements in Bloomberg
Bloomberg Law, 07.21.2021

Scott Michel and Mark Matthews Joined Public Radio Station KPCW's Mountain Money to Discuss Biden's Plans
for the IRS
KPCW's Mountain Money, 07.19.2021

Scott Michel Comments on Weisselberg Case in The Hill
The Hill, 07.04.2021

Peter Barnes Talks to POLITICO on Global Tax Deal
POLITICO, 07.01.2021

Peter Barnes Comments on the Global Tax Fight in POLITICO
POLITICO, 06.30.2021

TIME Quotes Mark Matthews on Programs Overwhelming the IRS
Time, 06.29.2021

Charles Ruchelman Comments on Recent Income Tax Leak
AMI Magazine, 06.16.2021

Legal 500 Recognizes Caplin & Drysdale Attorneys
Awards & Rankings | 06.10.2021

Clark Armitage Comments on Puerto Rico and New IRS Review in Bloomberg
Bloomberg Law, 06.03.2021

Peter Barnes Weighs in on Indian Software Fee Ruling in Tax Notes
Tax Notes, 05.24.2021

Chambers USA Recognizes Caplin & Drysdale Attorneys
Awards & Rankings | 05.20.2021

PODCAST: Peter Barnes Discusses Global Minimum Corporate Tax on FinReg Pod
the FinReg Pod., 05.19.2021

Scott Michel Comments on Swiss Life Settlement with DOJ in Tax Notes
Tax Notes, 05.16.2021

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
Awards & Rankings | *Super Lawyers*, 04.29.2021

Clark Armitage and Dianne Mehany Weigh in on Act 20 and Act 22 Beneficiaries in Puerto Rico
The Weekly Journal, 04.07.2021

New York Times Quotes Peter Barnes on Proposed Tax Changes From Biden Administration
New York Times, 04.05.2021

David Rosenbloom Comments on Upcoming Tax Changes Under Biden Administration
The Deal Pipeline, 03.17.2021

Mark Matthews Weighs in on Lessons Learned From Pandemic Fraud
Bloomberg Law, 02.09.2021

Accounting Today Quotes Charles Ruchelman on *CIC Services v. IRS*
Accounting Today, 01.27.2021

Caplin & Drysdale Names Ross Sharkey Of Counsel to the Firm
01.04.2021

Charles Ruchelman Talks to Bloomberg on *CIC Services v. IRS*
Bloomberg Law, 12.30.2020

PODCAST: Robert Carney Discusses *CIC Services v. IRS*
The Federalist Society's Teleforum, 12.11.2020

Tax Notes Quotes Clark Armitage on Recent *Coca-Cola* Ruling
Tax Notes, 11.30.2020

Washingtonian Recognizes Caplin & Drysdale Attorneys Among Washington's Top Lawyers
Awards & Rankings | *The Washingtonian Magazine*, 11.19.2020

Caplin & Drysdale Welcomes Lauren Smith
11.16.2020

Caplin & Drysdale New York Attorneys are Recognized by Super Lawyers®
Awards & Rankings | *Super Lawyers*®, 11.06.2020

Tier 1 Rankings for Caplin & Drysdale's Practice Groups in U.S. News – Best Law Firms' List
Awards & Rankings | *U.S. News & World Report*, 11.05.2020

Mark Matthews Comments on IRS Investigating NRA in WSJ
The Wall Street Journal, 10.05.2020

Caplin & Drysdale Attorneys Receive Award for *Amazon.com v. Commissioner*
Awards & Rankings | *The ITR Americas Tax Awards*, 09.25.2020

Tax Notes Quotes Scott Michel on Tax Conspiracy Cases
Tax Notes, 08.28.2020

Caplin & Drysdale Earns Top Ranking in 2021 "Best Lawyers in America"
Awards & Rankings | *U.S. News & World Report*, 08.20.2020

Tax Notes Quotes Mark Matthews on IRS Criminal Investigation Division Chief
Tax Notes, 08.04.2020

Mark Matthews Comments on IRS Criminal Investigation Division Chief in Tax Notes
Tax Notes, 07.13.2020

17 Caplin & Drysdale Attorneys Recognized in 2020 Legal 500 Ranking
Awards & Rankings | *The Legal 500*, 07.06.2020

Peter Barnes Comments on Digital Tax Deal in Tax Notes
Tax Notes, 07.02.2020

6 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation Virtual May Meeting
06.29.2020

Elizabeth Stevens Weighs in on BEPS and OECD
Tax Notes, 05.11.2020

Chambers USA Recognizes Caplin & Drysdale Attorneys
Awards & Rankings | 05.05.2020

David Rosenbloom Comments on Serving as a Clerk to U.S. Supreme Court
Super Lawyers, 05.05.2020

Caplin & Drysdale D.C. Attorneys are Recognized by Super Lawyers®
Awards & Rankings | *Super Lawyers*, 05.04.2020

Law360 Quotes Elizabeth Stevens on Governments Questioning Losses
Law360, 05.01.2020

Elizabeth Stevens Comments on GILTI and Virus Losses in Law360
Law360, 04.29.2020

New York Times Quotes David Rosenbloom on Recent Repeal of Tax Limitations
New York Times, 04.24.2020

Mark Matthews Speaks to Law360 on IRS Redesign and Criminal Investigation Division
Law360 Tax Authority, 04.17.2020

Law360 Quotes Peter Barnes on Adjusting Comparables
Law360 Tax Authority, 04.14.2020

Law360 Quotes Mark Matthews on Uptick in Virus Payment Fraud
Law360, 04.03.2020

Charles Ruchelman Comments in Bloomberg on Taxpayer Privacy
Bloomberg Law, 04.03.2020

Law360 Quotes Mark Allison on Foreign Pension Plans
Law360, 03.30.2020

Christopher Rizek Comments in Politico on Companies Mining Tax Data
POLITICOPRO, 02.27.2020

Clark Armitage Weighs in on the Global Tax Regime in POLITICO
POLITICO, 02.22.2020

Law360 Quotes Mark Matthews IRS Using New Data Analytics Techniques
Law360 Tax Authority, 02.13.2020

David Rosenbloom Speaks to Bloomberg on Treasury Fixing Tax Laws
Bloomberg Law, 02.03.2020

David Rosenbloom Comments on GILTI and TCJA
Law360 Tax Authority, 01.27.2020

David Rosenbloom Weighs in on the Use of Data Analytics in Court Cases
Tax Notes, 01.23.2020

New York Times Quotes Clark Armitage on OECD Digital Tax Negotiations
New York Times, 01.23.2020

Christopher Rizek Speaks to Law360 on IRS Enforcement
Law360, 01.22.2020

PODCAST: Robert Carney Joins Discussion on *Baldwin v. U.S.*
The Federalist Society's Teleforum, 01.08.2020

Law360 Comments on Incoming Timing Rules Letter from Caplin & Drysdale Attorneys
Law360 Tax Authority, 12.16.2019

Mark Allison Speaks to Law360 on Altera Corp.'s Failed Ninth Circuit Challenge
Law360 Tax Authority, 11.15.2019

Caplin & Drysdale Earns Top-Tier "Best Law Firms" Rankings in 10th Edition of U.S. News – Best Lawyers Awards & Rankings | *U.S. News & World Report*, 11.01.2019

Mark Allison Talks to Tax Notes on IRS Corporate Audit Campaigns
Tax Notes, 10.25.2019

Law360 Quotes Clark Armitage on OECD Global Tax Plan
Law360 Tax Authority, 10.10.2019

Washington Post Talks to Mark Matthews on IRS Mandatory Audit Program
Washington Post, 10.04.2019

Peter Barnes Comments on Sharia Law and Cross-Border Transactions in Islamic Finance News
Islamic Finance News, 10.02.2019

Caplin & Drysdale Announces the Election of Four New Members
10.01.2019

Elizabeth Stevens Talks to Law360 on OECD Tax Proposals
Law360 Tax Authority, 10.01.2019

Victor Jaramillo Comments on Repatriation Tax in Bloomberg
Bloomberg Law, 09.30.2019

Law360 Quotes David Rosenbloom on Information Sharing
Law360, 09.27.2019

Caplin & Drysdale Welcomes Jonathan Black, George O'Connor, and Sarah Racicot
09.25.2019

Charles Ruchelman Comments on Recent IRS Settlement Offer for Microcaptive Insurers in Tax Notes
Tax Notes, 09.17.2019

Mark Allison and Aaron Esman Listed Among Top Tax Lawyers in New York Super Lawyers®
Super Lawyers, 09.13.2019

Law360 Quotes Scott Michel on Enforcement of a Potential Wealth Tax
Law360 Tax Authority, 09.12.2019

Bloomberg Quotes Peter Barnes on Digital Tax Plan
Bloomberg Law, 09.09.2019

WSJ Quotes David Rosenbloom: Companies Say They Can Ignore Cost of U.S. Tax Rules
The Wall Street Journal, 08.30.2019

Law360 Quotes Victor Jaramillo on IRS Cryptocurrency Rules
Law360 Tax Authority, 08.23.2019

Scott Michel Talks About the State of Offshore Enforcement
Law360, 08.22.2019

Mark Matthews Comments on Fraud Referrals Under New IRS Division Head in Tax Notes
Tax Notes, 08.20.2019

David Rosenbloom Comments on Amazon Defeating IRS Over Cost-Sharing Rules in Law360
Law360 Tax Authority, 08.20.2019

Caplin & Drysdale Attorneys Listed as "Best Lawyers In America"
Awards & Rankings | 08.15.2019

Mark Matthews Comments on IRS Criminal Investigation Division
MLex US Tax Watch, 08.12.2019

Tax Notes Quotes Clark Armitage on Stock-Based Compensation
Tax Notes, 08.06.2019

Niles Elber Comments on Voluntarily Disclosing Tax Violations in Law360
Law360 Tax Authority, 08.05.2019

NBC News Talks to Christopher Rizek on Trump's State Taxes
NBC News, 07.22.2019

Mark Matthews Quoted in "Inside the IRS's Audits of the President"
POLITICO, 07.19.2019

Scott Michel Comments on Justice Stevens in Law360
Law360, 07.18.2019

Charles Ruchelman Comments on *Taylor Lohmeyer* Case
Law360 Tax Authority, 07.12.2019

David Rosenbloom Speaks to Bloomberg Law on "AbbVie Moves Allergan Profits to U.S. in Partial GOP Tax Law Win"

Bloomberg Law, 06.26.2019

David Rosenbloom Speaks to Law360 on "Closing Gaps In GILTI Opens Up Authority Questions"

Law360, 06.19.2019

David Rosenbloom Speaks to Bloomberg Law on GILTI

Bloomberg Law, 06.17.2019

Mark Allison Speaks to Law360 on "9th Circ.'s Revival of IRS Rules Stretches 'Arm's Length'"

Law360, 06.13.2019

The Legal 500 Recognizes 19 Caplin & Drysdale Attorneys

Awards & Rankings | *The Legal 500*, 06.04.2019

Christopher Rizek Talks to Law360 on U.S. Supreme Court Petition

Law360 Tax Authority, 05.17.2019

Elizabeth Stevens Comments on U.S. & India APAs

Law360 Tax Authority, 05.10.2019

David Rosenbloom Talks to Bloomberg on Trump's Interest Income

Bloomberg, 05.08.2019

National Journal Quotes Christopher Rizek: Whoever Wins Subpoena Fight, Executive-Branch Employees Lose

National Journal, 05.03.2019

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

05.03.2019

Law360 Quotes Clark Armitage: Debate Over GILTI's Jobs Offshoring Incentive Continues

Law360 Tax Authority, 05.03.2019

Charles Ruchelman Comments on Captive Insurance in Law360

Law360 Tax Authority, 05.02.2019

Scott Michel Talks to Tax Notes on Offshore Enforcement

Tax Notes, 04.29.2019

Law360 Quotes Elizabeth Stevens: Defining Marketing, Trademark IP Could Sink OECD Tax Plan

Law360 Tax Authority, 04.29.2019

WSJ Quotes Mark Matthews on Trump's IRS Audit Files

The Wall Street Journal, 04.25.2019

Caplin & Drysdale Attorneys Recognized Once Again by *Chambers USA*

Awards & Rankings | *Chambers USA*, 04.25.2019

Super Lawyers® Recognizes 22 Caplin & Drysdale Attorneys in D.C.

Awards & Rankings | *Super Lawyers*, 04.22.2019

Christopher Rizek Talks to Bloomberg Law on Trump's Tax Returns

Bloomberg Law, 04.17.2019

Bloomberg Law Quotes Christopher Rizek: Democrat Neal Tries Anew to Make IRS Release Trump's Tax Returns
Bloomberg Law, 04.13.2019

Christopher Rizek Comments on Request for Trump's Tax Returns
HuffPost, 04.12.2019

Christopher Rizek Talks to ABC News on Mnuchin's Involvement with Trump's Tax Returns
ABC News, 04.11.2019

Mark Allison Comments on IRS's Global High Wealth Audits
ProPublica, 04.05.2019

Mark Matthews & Meghan Biss Comment on Tax Impact of College Admissions Scandal
Associated Press, 04.02.2019

Law360 Quotes Peter Barnes on Record Number of U.S. Companies Seeking APAs in 2018
Law360 Tax Authority, 03.27.2019

CNN Quotes Scott Michel and Meghan Biss on Tax Impact of College Admissions Scandal
CNN, 03.22.2019

Law360 Quotes Jonathan Brenner and Peter Barnes: Federal Tax Overhaul Could Keep Homegrown IP in the U.S.
Law360, 03.22.2019

Niles Elber Comments on Harsher Enforcement for Taxpayers Abusing the Tax System
Tax Notes, 03.20.2019

MEDIA ADVISORY: Tax Problems Loom in the College Admissions Scandal
Caplin & Drysdale, Chartered, 03.18.2019

Elizabeth Stevens Comments: U.S. Seeks to Broaden Digital Tax Discussions
Law360 Tax Authority, 03.08.2019

Wall Street Journal Quotes Scott Michel on Manafort Sentencing
The Wall Street Journal, 03.08.2019

Kirsten Burmester Comments on Impact of Changes in U.S. Tax Law on Treaty Partners
Law360 Tax Authority, 02.22.2019

Tax Notes Quotes David Rosenbloom on Implementing Taxation of Foreign Sales of Partnership Interests
Tax Notes, 02.19.2019

Lexology's Client Choice Recognizes Patricia Lewis for Corporate Tax Legal Services Awards & Rankings | *Lexology's Client Choice™*, 02.07.2019

David Rosenbloom Offers Solution to Conflicting Provisions Under FTC Regs
Tax Notes, 02.04.2019

Christopher Rizek Comments on Best Practices for Tax Practitioners During Government Shutdown
Tax Notes, 01.28.2019

MLex Talks to Christopher Rizek on Ripple Effects of Government Shutdown
MLex US Tax Watch, 01.28.2019

Bloomberg Law Quotes Christopher Rizek and Meghan Biss on Impact of Growing IRS Backlog During Shutdown

Bloomberg Law, Daily Tax Report, 01.23.2019

NPR Interviews Christopher Rizek on Tax Filing Season and Government Shutdown

NPR, 01.23.2019

Christopher Rizek Talks to Bloomberg Law on IRS During Government Shutdown

Bloomberg Law, Daily Tax Report, 01.22.2019

ABC News Quotes Christopher Rizek: Clamor Growing for Trump Tax Returns as Key House Democrat Urges Caution

ABC News, 01.16.2019

Mark Matthews Comments on Impact of Government Shutdown on U.S. Taxpayers

Law360, 01.14.2019

Law360: Mark Allison Comments on \$2.8B Denmark Refund Case

Law360, 01.10.2019

10 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation Midyear Meeting

01.03.2019

Law360 Quotes Elizabeth Stevens: Lack of Noncash Exceptions in BEAT Rules Has Wide Scope

Law360, 12.18.2018

CBS News Quotes Victor Jaramillo on Writing Off Bitcoin Losses

CBS News MoneyWatch, 12.14.2018

Clark Armitage Comments on BEAT Calculations and Changes in U.S. Transfer Pricing

Law360 Tax Authority, 11.29.2018

Christopher Rizek Discusses U.S. Tax Court Judge Lauber with Bloomberg Law

Bloomberg Law, Daily Tax Report, 11.28.2018

Who's Who Legal Selects David Rosenbloom and Christopher Rizek as Leaders in Corporate Tax Awards & Rankings | *Who's Who Legal*, 11.28.2018

Patricia Lewis Talks to Law360: Tariffs Could Throw Advance Pricing Agreements Into Doubt

Law360, 11.19.2018

Law360 Quotes Peter Barnes on Early Test of Digital Tax

Law360 Tax Authority, 11.08.2018

Peter Barnes and David Rosenbloom Comment on IRS Transfer Pricing Tool

Law360 Tax Authority, 11.02.2018

Peter Barnes Discusses Impact of UK Digital Tax Plan on Silicon Valley

Corporate Counsel, 11.02.2018

Caplin & Drysdale Earns 11 Tier 1 Practice-Area Rankings in Ninth Edition of *U.S. News – Best Law Firms®* Awards & Rankings | *U.S. News & World Report*, 11.01.2018

David Rosenbloom Talks to POLITICO on UK Digital Services Tax and Its Implications for the U.S.

POLITICO, 11.01.2018

Mark Matthews Talks to ABC News on Trump Tax Investigation
ABC News, 10.29.2018

Law360 Comments on Danish Tax Fraud Case Letter from Caplin & Drysdale Attorneys
Law360 Tax Authority, 10.29.2018

Peter Barnes Talks to IRS Official John Hughes on IRS' APA Program Changes
Law360 Tax Authority, 10.25.2018

Bloomberg Quotes Victor Jaramillo on Using Opportunity Zone Funds to Reduce Taxes
Bloomberg, 10.19.2018

Law360's Yvonne Juris Profiles Clark Armitage: Caplin & Drysdale Picks Transfer Pricing Pro As New President
Law360 Tax Authority, 10.17.2018

Transfer Pricing Strategist Clark Armitage Named President of Caplin & Drysdale
10.11.2018

PODCAST: Mark Matthews Discusses the IRS and Tax Evasion with AML's John Byrne
AML Conversations, 10.10.2018

Accounting Today Quotes Anne O'Brien on IRS Chief Rettig's Potential Response to Trump Tax Investigation
Accounting Today, 10.04.2018

Associated Press Quotes Mark Matthews: Probes of Trump Taxes Carry Potential for Millions in Fines
The Associated Press, 10.04.2018

Caplin & Drysdale's Newest Member Victor Jaramillo Serves Tax Controversy Needs of Global Community
Caplin & Drysdale, 10.03.2018

POLITICO Quotes Mark Matthews on Trump Tax Investigation
POLITICO Pro, 10.03.2018

7 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation Fall Meeting
Caplin & Drysdale, 10.02.2018

David Rosenbloom Talks to Law360 on Transfer Pricing Issues to be Explored at ABA Conference
Law360, 10.02.2018

Scott Michel Discusses Offshore Voluntary Disclosure Program Shutdown with Law360
Law360, 09.28.2018

Mark Allison Talks to Law360 on Transfer Pricing Cases That May Impact Altera Rehearing
Law360, 09.28.2018

Law360 Quotes Patricia Lewis on IRS Revamp of APA Program
Law360, 09.25.2018

Law360 Quotes Clark Armitage on GILTI Glitch
Law360, 09.19.2018

David Rosenbloom Talks to Law360 on Proposed GILTI Regs' Anti-Abuse Rule Seen As Overly Broad
Law360, 09.17.2018

New York Super Lawyers Lists Tax Attorneys Mark Allison and Aaron Esman for 2018 Awards & Rankings | *Super Lawyers*®, 09.14.2018

Mark Matthews Talks to Wall Street Journal on U.S. Taxpayers With Undisclosed Offshore Accounts
The Wall Street Journal, 09.14.2018

Wall Street Journal Quotes Mark Matthews: Senate Confirms Charles Rettig as IRS Commissioner
The Wall Street Journal, 09.12.2018

Niles Elber Comments on Offshore Voluntary Disclosure Program Ending
MLex US Tax Watch, 09.11.2018

Christopher Rizek Comments on More Qualified Improvement Property Fix Options
Tax Notes, 09.06.2018

Peter Barnes Speaks to Law360 on IRS Audit Program for Large Companies
Law360, 08.31.2018

Scott Michel Talks to Tax Notes on Nominee to Head IRS
Tax Notes, 08.28.2018

Worldwide Tax Daily Quotes David Rosenbloom: BEAT Conflict Clouds Future of Pending Tax Treaties
Tax Notes, 08.27.2018

Bloomberg BNA Quotes Patricia Lewis: 4 Things to Know About the IRS's Intercompany Pricing Deals
Bloomberg BNA, 08.27.2018

Worldwide Tax Daily Quotes Clark Armitage: Exempts Score Win with GILTI Unrelated Business Income Exclusion
Tax Notes, 08.22.2018

Tax Notes Quotes Christopher Rizek on Brett Kavanaugh's Potential Impact on the Legal Tax Community
Tax Notes Today, 08.20.2018

Mark Matthews Speaks to Tax Notes on IRS Rotating Fraud Technical Advisers
Tax Notes, 08.17.2018

Caplin & Drysdale Improves Ranking in 2019 "Best Lawyers in America"
Awards & Rankings | 08.15.2018

POLITICO Quotes Scott Michel on Manafort Criminal Tax Charges
POLITICO, 08.15.2018

David Rosenbloom Talks to Law360: Altera Withdrawal Highlights Warring Transfer Pricing Rules
Law360, 08.15.2018

Caplin & Drysdale International Tax Controversy Team Receives ABA Pro Bono Award
Both | *Caplin & Drysdale, Chartered*, 08.02.2018

Law360 Quotes Peter Barnes: IRS Floats Rules for Transition Tax on Foreign Earnings
Law360, 08.01.2018

Peter Barnes Talks to Law360 on Multinationals' Data Paints Global Picture, But Has Limits
Law360, 07.27.2018

Mark Allison Speaks to Law360: 9th Circuit's Shift from Arm's-Length Rule May Embolden IRS
Law360, 07.24.2018

Victor Jaramillo Comments on IRS Penalty Cap with Law360
Law360, 07.19.2018

Law360 Quotes Victor Jaramillo: FATCA Complexity Leading to Lackluster Results
Law360, 07.12.2018

Bloomberg Law Quotes David Rosenbloom: Tax Loophole Could Let Wealthy Tap 21% Corporate Rate
Bloomberg Law, Daily Tax Report: International, 07.12.2018

David Rosenbloom Named to *The Legal 500's* Hall of Fame
Awards & Rankings | *The Legal 500*, 07.10.2018

Christopher Rizek Comments on Changes to IRS Appeals Process with Law360
Law360, 07.10.2018

David Rosenbloom and Elizabeth Stevens Submit Amicus Brief to Uphold Decision Favoring Amazon in IRS
Transfer Pricing Dispute
Law360, 07.09.2018

Peter Barnes Comments on OECD Super Treaty with Bloomberg BNA
Bloomberg BNA, 07.06.2018

Charles Ruchelman Discusses Second Quarter 2018 Cases with Bloomberg BNA
Bloomberg BNA, 07.05.2018

Law360 Quotes Elizabeth Stevens on BEAT Policies to Look Out For Later This Year
Law360, 07.05.2018

Law360 Quotes Christopher Rizek: Top 5 Federal Tax Cases Of 2018
Law360, 07.03.2018

Peter Barnes Talks to Bloomberg BNA: New Taxation Threshold 'No Golden Goose' for Countries
Bloomberg BNA, 06.29.2018

Bloomberg Law Quotes Peter Barnes: OECD Super Treaty Enters Into Force July 1
Bloomberg Law, Daily Tax Report: International, 06.28.2018

Niles Elber Comments on Nominee to Head IRS with Bloomberg
Bloomberg BNA, 06.27.2018

Wall Street Journal Quotes David Rosenbloom: Companies Hope to Beat a New Tax Called the BEAT
The Wall Street Journal, 06.26.2018

Washington Post Quotes Christopher Rizek on Trump's Charitable Foundation Tax Returns
The Washington Post, 06.22.2018

Mark Matthews Talks to Tax Notes on Possible Pros and Cons in Fraud Program Changes
Tax Notes, 06.20.2018

David Rosenbloom Discusses with Tax Notes One Reason Congress Should Revisit the BEAT
Tax Notes, 06.18.2018

Law360 Quotes Patricia Lewis: IRS 'Reference Set' Library Could Speed Up Transfer Pricing Cases
Law360, 06.18.2018

Christopher Rizek Speaks to Law360 on Facebook and Taxpayer Bill of Rights
Law360, 06.12.2018

Clark Armitage Comments on GILTI and Subpart F
MLex US Tax Watch, 06.08.2018

Victor Jaramillo Talks to Law360 on Latin American and Foreign Tax Credits
Law360, 06.05.2018

Law360 Quotes Clark Armitage: Tax Laws' Avoidance Rules Could Entangle Foreign Deals
Law360, 06.04.2018

2018 Legal 500 Distinguishes 18 Caplin & Drysdale Attorneys, Firm Renews "Top-Tier Firm" Ranking for Tax Controversy Awards & Rankings | *The Legal 500*, 05.31.2018

Mark Matthews Comments: IRS More Aggressive in Closing Whistleblower Cases
Bloomberg Law, Daily Tax Report, 05.30.2018

Tax Notes Quotes David Rosenbloom on Tax Reform Open Questions
Tax Notes, 05.29.2018

Niles Elber Comments on *Marinello v. United States* Decision
MLex US Tax Watch, 05.28.2018

U.S. News Quotes Elizabeth Stevens on How Changes to BEAT Could Impact Cost of Goods Sold
U.S. News & World Report, 05.25.2018

Clark Armitage Speaks to Law360 on 5 Ways TCJA Could Play Out for Multinational Companies
Law360, 05.18.2018

Bloomberg Quotes Christopher Rizek on Facebook's IRS Appeal Denial
Bloomberg BNA, Tax Management Transfer Pricing Report, 05.15.2018

Niles Elber and Victor Jaramillo Talk to Law360 on Offshore Voluntary Disclosure Program Ending
Law360, 05.14.2018

Peter Barnes Comments on Foreign Tax Credit Issues in Law360
Law360, 05.09.2018

9 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation Meeting
Caplin & Drysdale, 05.09.2018

Christopher Rizek Comments on Exchange of U.S. Taxpayer Data
Tax Notes, 05.08.2018

David Rosenbloom Quoted by Tax Notes on the Conflict Between GILTI and U.S. Tax Treaties
Tax Notes, 05.07.2018

Chambers USA Recognizes 10 Caplin & Drysdale Lawyers as "Leaders in Their Fields" Awards & Rankings | *Chambers USA*, 05.03.2018

18 Caplin & Drysdale Attorneys Recognized by Super Lawyers in D.C.
04.23.2018

Mark Matthews Comments on Moving CI Cases to Treasury

Tax Notes, 04.23.2018

Caplin & Drysdale Attorneys Support Rettig as IRS Commissioner

Tax Notes, 04.19.2018

Elizabeth Stevens Discusses Further Clarification on BEAT Rule with Bloomberg

Bloomberg BNA, 04.16.2018

Law360 Quotes David Rosenbloom on TCJA and Inversions

Law360, 04.16.2018

Tax Notes Quotes Christopher Rizek on Trump Tax Court Judge Nominee

Tax Notes, 04.11.2018

Scott Michel Talks to Law360 on IRS Replacing Offshore Voluntary Disclosure Program

Law360, 04.10.2018

Peter Barnes Discusses Increase in Closed IRS Advance Pricing Agreements with Law360

Law360, 04.09.2018

Law360 Quotes Peter Barnes on Challenges to Quebec Digital Tax

Law360, 04.09.2018

Charles Ruchelman Comments on Proposed IRS Changes Likely to Increase Access to Appeals

Daily Tax Report, 03.28.2018

David Rosenbloom Responds to Tax Reform Q&A

WalletHub.com, 03.28.2018

Law360 Quotes Christopher Rizek: Facebook Row May Expand Access to IRS Appeals Process

Law360, 03.26.2018

Peter Barnes Talks to Law360: OECD Profit Attribution Guidelines for Multinational Companies

Law360, 03.23.2018

Scott Michel Comments on Closure of IRS Offshore Voluntary Disclosure Program

MLex US Tax Watch, 03.23.2018

Christopher Rizek Comments on IRS Nominees

MLex US Tax Watch, 03.15.2018

Mark Matthews Comments on Closure of IRS Offshore Voluntary Disclosure Program

Tax Notes, 03.14.2018

Caplin & Drysdale Welcomes Steven Hannes to Its International Tax Group

Caplin & Drysdale, 03.05.2018

Anne O'Brien and Clark Armitage Listed Among Top 30 U.S. Lawyers by Euromoney

Awards & Rankings | *Euromoney Expert Guides*, 03.02.2018

Charles Ruchelman Comments on IRS Chief Counsel Nomination

Law360, 03.02.2018

Scott Michel Comments on Charles Rettig, Nominee to Head IRS

MLex US Tax Watch, 03.02.2018

Peter Barnes Comments on BEAT Provision in Law360
Law360, 02.22.2018

Law360 Quotes Victor Jaramillo on Reporting Bitcoin for FBAR Filings
Law360, 02.14.2018

Washington Post Quotes Christopher Rizek on California Plan to Skirt GOP Tax Law
The Washington Post, 02.12.2018

Scott Michel Comments on Charles Rettig's Nomination for IRS Commissioner
Tax Notes, 02.09.2018

Christopher Rizek Comments on Potential Nominee for IRS Commissioner
Bloomberg Law, 02.06.2018

Law360 Quotes Peter Barnes and Kirsten Burmester: Applying Foreign Tax Credit To Repatriation A Daunting Task
Law360, 01.30.2018

David Rosenbloom's Article Cited on International Tax Portal
TaxIndiaInternational.com, 01.27.2018

Bloomberg BNA Quotes Christopher Rizek: Trump May Name Tax Lawyer Rettig as Next IRS Commissioner
Bloomberg BNA, 01.25.2018

Peter Barnes Authors Chapter in United Nations Handbook, Selected Issues in Protecting the Tax Base of Developing Countries
Tax Notes, 01.22.2018

Law360 Quotes Clark Armitage: Cos. Should Consider Foreign Response To US Tax Reform, 2018 Law360 17-143
Law360, 01.17.2018

Caplin & Drysdale Welcomes Former IRS Nonprofit Senior Technical Adviser and Strengthens Tax Controversies and Private Client Groups
Caplin & Drysdale, Chartered, 01.16.2018

Peter Barnes and David Rosenbloom Discuss New Tax Law Undermining Treaties and International Policy
Law360, 01.09.2018

Law360 Speaks to Elizabeth Stevens About Retiring Tax Court Judge Robert Wherry
Law360, 01.05.2018

Scott Michel Comments on Money Laundering Bill's Use in Tax Cases
Tax Notes, 01.02.2018

Law360 Talks to Clark Armitage, Peter Barnes, and Elizabeth Stevens on International Tax Cases to Watch in 2018
Law360, 01.02.2018

Peter Barnes and David Rosenbloom Discuss Impact of New International Tax System with Law360
Law360, 01.01.2018

How Will Businesses and Individuals be Impacted by Tax Reform?
Caplin & Drysdale, Chartered, 01.01.2018

Law360 Speaks with Peter Barnes on Whether Companies Will Bring Intellectual Property and Its Revenue Back to the U.S.

Law360, 12.22.2017

Wall Street Journal Quotes James Salles and Richard Skillman on AT&T Corporate Tax Savings

The Wall Street Journal, 12.21.2017

Law360 Speaks with Mark Allison on Tax Bill's Effect on Corporate Tax Planning

Law360, 12.21.2017

BBC News Quotes David Rosenbloom on Trump's Tax Plans Impact on International Tax

BBC News, 12.18.2017

David Rosenbloom Comments: Legislation Raises Tax Treaty Concerns for U.S. Multinationals

Daily Tax Report, 12.14.2017

Caplin & Drysdale Tax Lawyers Work with Croatian Ministry of Finance on Tax Enforcement Issues

12.11.2017

Law360 Quotes Peter Barnes and David Rosenbloom on International Interest Deductions in Tax Bill

Law360, 12.07.2017

New York Times Quotes Scott Michel on Tax Plan's Ambiguity

The New York Times, 12.05.2017

Mark Matthews Comments: IRS Letters Will 'Nudge' U.S. Clients for Swiss Bank Data

Bloomberg BNA, 12.01.2017

MEDIA ADVISORY: Will the IRS Know What Gifts Prince Harry Gives Meghan Markle for Christmas?

Caplin & Drysdale, Chartered, 11.30.2017

Law360 Quotes Scott Michel: 'Willfulness' in Civil FBAR Cases Comes Down to the Facts

Law360, 11.21.2017

Stafford Smiley Comments on Changes to the Estate Tax in the House Tax Bill

Tax Notes, 11.20.2017

Christopher Rizek Comments: Koskinen Revelation of Trump's Tax Return Status May Constitute a Crime

Tax Notes, 11.17.2017

Law360 Quotes Peter Barnes and David Rosenbloom: Foreign Credits At Risk in Senate Tax Bill, Analysts Say

Law360, 11.16.2017

Law360 Quotes James Salles: Tax Bill's Legal Fee Provision May Burden Attorneys

Law360, 11.16.2017

Washington Post Quotes David Rosenbloom on Americans with Offshore Interests

The Washington Post, 11.14.2017

Law360 Quotes David Rosenbloom on Threat to 20% Corporate Tax Rate

Law360, 11.08.2017

David Rosenbloom Discusses Impact of Cutting Corporate Tax Rate

The Christian Science Monitor, 11.08.2017

Scott Michel Comments on FBAR Penalty Examinations

Bloomberg BNA Daily Tax Report, 11.07.2017

David Rosenbloom Comments on Offshore Tax Havens

Daily Tax Report, 11.05.2017

Former Senior Counsel to Florida Power & Light Joins Caplin & Drysdale's Tax Team

11.01.2017

Tier 1 Rankings for Caplin & Drysdale's Legal Services in 2018 U.S. News – Best Law Firms' List

Awards & Rankings | *U.S. News & World Report*, 11.01.2017

Scott Michel and Chief Judge Paige Marvel Discuss Increase in International Tax Enforcement Cases at Tax Controversy Conference

Tax Notes, 10.30.2017

Scott Michel Speaks With U.S. Tax Court Chief Judge on Increased Global Tax Litigation at ITEC Session

Bloomberg BNA, 10.30.2017

Law360 Quotes Peter Barnes on 25% Corporate Tax Rate Proposal

Law360, 10.26.2017

Tax Notes Quotes 3 Caplin Tax Controversy Attorneys on the IRS's Aggressive FBAR Enforcement

Tax Notes, 10.19.2017

Scott Michel Comments on IRS Spontaneous Disclosures

Tax Notes, 10.12.2017

Scott Michel Comments on High-Profile Foreign Bank Account Decision

Tax Notes, 10.12.2017

David Rosenbloom Comments on Proposed Tax Cuts

TheStreet.com, 09.29.2017

David Rosenbloom Discusses "Corporate Integration" Plan with Law360

Law360, 09.19.2017

Bloomberg BNA Quotes Mark Matthews: IRS, Agencies Tag Team to Fight Harvey-Related Crime

Bloomberg BNA, 09.05.2017

Bloomberg BNA Quotes Mark Matthews on FATCA Status

Bloomberg BNA, 08.29.2017

David Rosenbloom Comments: Delays Fuel Speculation About Regulatory Future

Tax Notes, 08.22.2017

Niles Elber Comments on OVDP Hotline Guide

Tax Notes, 08.21.2017

Scott Michel Comments on Public Leaks Aiding in U.S. OVDP Penalty

Tax Notes, 08.18.2017

Caplin & Drysdale Earns Top Ranking in 2018 "Best Lawyers in America"

Awards & Rankings | 08.15.2017

David Rosenbloom Comments on Alternatives to BAT
Forbes, 07.28.2017

7 Caplin & Drysdale Lawyers Listed as Leaders in Their Field by Expert Guides
Awards & Rankings | *Expert Guides*, 07.25.2017

David Rosenbloom Comments on Trump's Proposed 15% Corporate Tax Rate
Bloomberg Law, 06.27.2017

Caplin & Drysdale Names Victor Jaramillo Of Counsel to the Firm
Caplin & Drysdale, Chartered, 06.12.2017

18 Caplin & Drysdale Lawyers Recognized in 2017 Legal 500 Ranking
Awards & Rankings | *The Legal 500*, 06.02.2017

Caplin & Drysdale Lawyers Improve Their 2017 Chambers' Rankings
Awards & Rankings | *Chambers USA*, 06.02.2017

David Rosenbloom Offers Analysis of Republican Party's Tax Reform Proposal
FiscoOggi, 05.31.2017

Tax Notes Quotes Mark Matthews: Criminal Tax Attorneys Suggest CI Refocus on Traditional Cases
Tax Notes, 05.30.2017

Bloomberg BNA Quotes Mark Matthews: U.S. Mining Swiss Bank Data to Find Tax Cheaters
Bloomberg BNA, 05.26.2017

Law360 Speaks to Charles Ruchelman on New Liabilities for Partnership Reps
Law360, 05.17.2017

Scott Michel Comments on Enforcement of Offshore Accounts
Tax Notes, 05.15.2017

David Rosenbloom Discusses Corporate Repatriation of Profits with Tax Notes
Tax Notes, 05.12.2017

Charles Ruchelman Discusses Micro-Captive Transaction Disclosures with Accounting Today
Accounting Today, 05.05.2017

Clark Armitage Speaks to Bloomberg BNA on Tax Overhaul's Impact on IRS Multinational Agreements
Bloomberg BNA, 05.01.2017

Caplin & Drysdale Lawyers Listed Among D.C.'s Most Prominent Practitioners
Awards & Rankings | *Super Lawyers*, 04.27.2017

BNA Quotes David Rosenbloom: GOP Plan to Bring Back Offshore Cash May Cause Headaches
Bloomberg BNA, 04.19.2017

Tax Notes Quotes David Rosenbloom: Challenging Outbound Transfers of Intangibles
Tax Notes, 04.17.2017

Charles Ruchelman Discusses FBAR Filing and Deadlines with Daily Tax Report
Daily Tax Report, 04.14.2017

Tax Notes Quotes David Rosenbloom: States Consciously Uncoupling From the Cash Flow Tax?
Tax Notes, 04.10.2017

Mark Allison Speaks to Tax Notes on Information Disclosure

Tax Notes, 04.07.2017

Arielle Borsos and Charles Ruchelman Comment on Dutch Request for John Doe Summonses

Tax Notes, 04.06.2017

Tax Notes Quotes David Rosenbloom: The Hexagon of Tax Reform

Tax Notes, 04.05.2017

Law360 Quotes Mark Allison on Transfer Pricing Cases After Amazon Loss

Law360, 03.24.2017

Christopher Rizek Comments: IRS Appeals Is Open to Suggestions on Conference Changes

Tax Notes, 03.06.2017

Scott Michel Comments on Border Adjustment Treaty Damage Hindering Tax Enforcement

Tax Notes, 03.02.2017

Caplin & Drysdale Attorneys Mentor ABA Rule of Law Initiative Fellows from Croatia

02.27.2017

Mark Allison and Charles Ruchelman Comment: Record-Low Audit Rates Could Reverse as IRS Alters Exams

Bloomberg BNA, 02.27.2017

Clark Armitage Speaks to Bloomberg BNA: Services a Possible Sticking Point in GOP Cash Flow Tax Plan

Bloomberg BNA, 02.23.2017

Charles Ruchelman Discusses Partnership Audit Rule Freeze Causing Confusion For States

Law360, 02.17.2017

Christopher Rizek Discusses GOP Tax Reform Plan with Tax Notes

Tax Notes, 02.10.2017

CCH Quotes Mark Allison: Tax Court Finds Deficiency Notice Ambiguous But Taxpayer Not Misled

CCH Standard Federal Tax Reports, 02.09.2017

Daily Tax Report Quotes Charles Ruchelman: IRS Revving Up Efforts to Find Partners Who Owe Tax

Daily Tax Report, 02.07.2017

Clark Armitage Speaks to Bloomberg BNA: GOP Tax Overhaul Could Throw U.S. Tax Treaties into Question

Bloomberg BNA, 02.03.2017

Charles Ruchelman Comments on Montana CPAs Opposing Partnership Audit Legislation

Bloomberg BNA's Tax Management Weekly State Tax Report™, 01.27.2017

Clark Armitage Speaks to Law360: GOP Tax Plan May Increase Transfer Pricing Scrutiny Abroad

Law360, 01.27.2017

IRS Proposed Partnership Audit Rules Withdrawn from OFR

www.PartnershipRepresentative.com, 01.26.2017

Caplin & Drysdale Tax Lawyer Charles Ruchelman Launches Website on New Partnership Audit Rules

Press Release | *Caplin & Drysdale*, 01.24.2017

Scott Michel Speaks to Tax Notes on Tax Practitioners' Obligations When Advising Clients with Foreign Accounts

Tax Notes, 01.17.2017

BNA Quotes Scott Michel: Will Trump Keep Spotlight on Multinationals' Tax Compliance?

Bloomberg BNA, 01.13.2017

MarketWatch Quotes Mark Allison on Who May Pay More in Taxes Under Trump

MarketWatch, 12.31.2016

Tax Notes Interviews Christopher Rizek: IRS Turmoil Likely as Trump, GOP Ready Tax, Agency Reforms

Tax Notes, 12.30.2016

Bloomberg TV Interviews David Rosenbloom: Apple Challenges EU Tax Bill: Do They Have a Case?

Bloomberg Technology, 12.19.2016

Scott Michel Leads Discussion of Offshore Issues at Criminal Tax Conference

Tax Notes, 12.12.2016

David Rosenbloom Comments on Crackdown on Corporate Tax Avoidance

Law360, 12.09.2016

BNA Quotes Christopher Rizek: Anti-Union Drumbeat of Trump, Congress Spells Trouble for IRS

Bloomberg BNA, 12.07.2016

David Rosenbloom Comments on Americans Paying Apple Millions to Shelter Overseas Profits

WealthManagement.com, 12.07.2016

Tax Analysts Quotes Mark Matthews: McDougal, Instrumental to OVDP Development, to Retire

Tax Analysts, 12.02.2016

POLITICO Quotes Christopher Rizek: Trump Gets to Pick His Own Auditor

POLITICO, 11.23.2016

Tax Notes Quotes Scott Michel: DOJ Seeks John Doe Summons on Largest U.S. Bitcoin Exchanger

Tax Notes, 11.22.2016

MEDIA ADVISORY: Deadline for Small Captive Insurance Company Filing is January 30, 2017

Caplin & Drysdale, Chartered, 11.17.2016

David Rosenbloom Comments on EU Tax Probes Prompting Questions About Risk

Tax Management Transfer Pricing Report™, 11.17.2016

Caplin & Drysdale's Core Legal Services Earn Tier 1 Rankings in "Best Law Firms" for 2017

Awards & Rankings | *U.S. News & World Report*, 11.02.2016

Tax Notes Quotes Scott Michel: Non-Willfulness Not Only Streamlined Filing Claim U.S. DOJ Checking

Tax Notes, 10.31.2016

Daily Tax Report Quotes Scott Michel: IRS Goes Beyond Switzerland in Offshore Tax Enforcement Efforts

Daily Tax Report, 10.28.2016

Bloomberg BNA Interviews Scott Michel on Increased IRS/DOJ Offshore Compliance Efforts

Bloomberg BNA, 10.21.2016

Tax Notes Quotes Scott Michel on IRS Adding 47 Facilitators to Increased OVDP Penalty List
Tax Notes, 10.18.2016

Bloomberg BNA Quotes Mark Matthews on the White House Keeping Confidentiality When Vetting
Bloomberg BNA, 10.17.2016

AICPA Offers Comments/Recommendations to New Partnership Audit Regime
www.partnershiprepresentative.com, 10.12.2016

IRS Writing Partnership Audit Guidance Based on Present Law
www.partnershiprepresentative.com, 10.07.2016

Bloomberg Quotes Charles Ruchelman: Partnerships Up a Creek Without a Pushout in JCT Analysis
Bloomberg BNA Daily Tax Report, 10.07.2016

Partnership Audit Regime Proposed Regs Expected Soon
www.partnershiprepresentative.com, 09.30.2016

Bloomberg Interviews Scott Michel: Finish Line Unclear for Some FATCA Pacts as Banks Worry
Bloomberg BNA, 09.23.2016

Bloomberg Law Quotes Niles Elber: TIGTA Calls on IRS to Modernize Offer-in-Compromise System
Bloomberg Law, 09.09.2016

Scott Michel Comments on Donald Trump's Tax Returns in The Street
The Street, 08.29.2016

Bloomberg BNA Quotes David Rosenbloom on the Exit Tax
Bloomberg BNA, 08.29.2016

ACAMS Money Laundering Quotes Scott Michel on Possible Additional Required Disclosures in the UK
ACAMS Money Laundering, 08.25.2016

Bloomberg Quotes Scott Michel on Restaurateur Rowen Seibel
Bloomberg BNA, 08.19.2016

Best Lawyers in America Lists 18 Caplin & Drysdale Attorneys
Awards & Rankings | *U.S. News & World Report*, 08.15.2016

Bloomberg Quotes Scott Michel on Donald Trump's Tax Returns
Bloomberg, 08.12.2016

Caplin & Drysdale Comments on Partnership Audit Regime with Federal Tax Weekly
Federal Tax Weekly, 08.11.2016

The New Yorker Interviews Scott Michel on Trump's Tax>Returns
The New Yorker, 08.10.2016

Tax Analysts Quotes Mark Matthews and Scott Michel on the Future of OVDP
Tax Analysts, 08.01.2016

Caplin & Drysdale Listed in "Above the Law's" Tax Firm Power List
Awards & Rankings | *Above the Law*, 07.29.2016

Scott Michel Discusses the Lack of Americans Named in Panama Papers with The American Lawyer
The American Lawyer, 07.29.2016

Felix Laughlin Speaks to Tax Notes on the Debt-Equity Regs in 1980 and Today
Tax Notes, 07.25.2016

Daily Tax Report Quotes Charles Ruchelman on Pending Separation of Powers Act and Its Impact on Proposed Debt-Equity Regulations
Daily Tax Report, 07.25.2016

Niles Elber Quoted: IRS Faces Savvy Criminals but Lacks Funds to Fight Fraud
Bloomberg BNA, 07.14.2016

David Rosenbloom Comments on Notable Tax Laws and Regulations of 2016
Law360, 07.12.2016

David Rosenbloom Comments on EU Starbucks Ruling in Bloomberg BNA
Bloomberg BNA, 07.05.2016

Caplin & Drysdale Attorneys Offer Comprehensive Guide on FBAR Reporting Requirements
Press Release | *Caplin & Drysdale*, 06.29.2016

David Rosenbloom Discusses U.S. Uses New Model Treaty Language in Luxembourg Protocol with Tax Notes
Tax Notes, 06.23.2016

Bloomberg BNA Quotes David Rosenbloom on Luxembourg and U.S. Working on Treaty Language
Bloomberg BNA, 06.23.2016

Bloomberg BNA Quotes Clark Armitage on New IRS Audit Strategy
Bloomberg BNA, 06.23.2016

Scott Michel Comments on TIGTA Recent Report Criticizing OVDP
Tax Notes, 06.22.2016

Caplin & Drysdale Recognized for Cutting Edge Advice
Awards & Rankings | *The Legal 500*, 06.16.2016

Mark Allison Comments on Tax Court Extending Limitations Period
Federal Tax Weekly, 06.09.2016

Tax Notes Quotes Mark Allison on IRS Memo
Tax Notes Today, 06.08.2016

Law360 Quotes Clark Armitage on Country-by-Country Tax Reporting
Law360, 06.06.2016

Mark Matthews Comments on Moving IRS Criminal Investigation Division to Treasury
Tax Notes, 06.02.2016

Caplin & Drysdale Listed Among Top Lawyers for Tax, Bankruptcy, Estate Planning and Political Law
Awards & Rankings | *Chambers USA*, 06.01.2016

Mark Matthews Comments on Value of DOJ's Non-Target Letters
Tax Notes, 06.01.2016

Law360 Quotes Mark Allison on Wyly Ruling
Law360, 05.11.2016

Tax Notes Quotes Niles Elber on Domestic Disclosure
Tax Notes, 05.10.2016

Tax Notes Quotes Scott Michel on Criminal Tax Enforcement
Tax Notes, 05.10.2016

Scott Michel and Mark Matthews Comment on Number of U.S. Taxpayers Exposed by Panama Papers
Tax Notes, 05.10.2016

Daily Tax Report Quotes Scott Michel on Panama Papers Database
Daily Tax Report, 05.09.2016

Niles Elber Elected Fellow of the American College of Tax Counsel
05.09.2016

Tax Notes Quotes Charles Ruchelman on New Regulations Concerning Listed Transactions
Tax Notes, 04.28.2016

Super Lawyers Recognizes Caplin & Drysdale Lawyers from Several Practice Areas
Awards & Rankings | *Super Lawyers*, 04.26.2016

Bloomberg BNA Quotes Charles Ruchelman on New Partnership Examination and Collection Laws
Bloomberg BNA, 04.22.2016

Worldwide Tax Daily Quotes Clark Armitage: Bermuda Agrees to Automatic Exchange of Country-by-Country Reports
Worldwide Tax Daily, 04.21.2016

U.S. News & World Report Quotes Mark Matthews on Tax Havens
U.S. News & World Report, 04.19.2016

Tax Notes Quotes David Rosenbloom on G-20 Tax Agenda at 2016 NYU/KPMG Tax Lecture
Tax Notes Today, 04.19.2016

Bloomberg BNA Quotes Patricia Lewis on New IRS Appointment
Bloomberg BNA, 04.12.2016

Irish Examiner Quotes David Rosenbloom on Proposed Regulations Aimed at "Earnings Stripping"
Irish Examiner, 04.12.2016

European Union News Quotes Scott Michel on Efforts to Challenge View that U.S. is a Tax Haven
European Union News, 04.11.2016

Tax Notes Today Quotes Mark Matthews on Letter Senator Grassley Sent to Justice Department on IRS Impersonation Scams
Tax Notes Today, 04.11.2016

Tax Notes Today Quotes David Rosenbloom on U.S. Model Tax Convention
Tax Notes Today, 04.11.2016

Tax Notes Quotes Mark Matthews on Panama Papers
Tax Notes, 04.05.2016

Patricia Lewis and Anne O'Brien Named in 2016 "Best of the Best" Global Ranking
Awards & Rankings | *Expert Guides*, 04.05.2016

NBC Quotes Scott Michel on Panama Papers
NBC News, 04.05.2016

Elizabeth Stevens Speaks with Army Wife Talk Radio on Employer Tax Breaks for Hiring Vets
Army Wife Talk Radio, 04.05.2016

Politico Quotes Mark Matthews on Panama Papers Impact on Unreported Foreign Accounts
Politico, 04.05.2016

Scott Michel Comments on the U.S. as a Tax Haven for the Wealthy
Channel One Russian TV, 04.05.2016

Bloomberg BNA Quotes Mark Matthews and Peter Barnes on Impact of Panama Papers
Bloomberg BNA, 04.04.2016

Mark Matthews Discusses How IRS's Efforts on Refund Fraud are Hurting Other IRS Investigations
Tampa Tribune, 03.28.2016

Daily Tax Report Quotes Charles Ruchelman on Including FBAR Penalties in Whistle-Blower Rewards
Daily Tax Report, 03.16.2016

Bloomberg BNA Quotes Clark Armitage on Coca-Cola's Billion Dollar Tax Dispute with IRS
Bloomberg BNA, 03.16.2016

WSJ Talks to Scott Michel After Two Firms Plead Guilty to Helping U.S. Clients Hide Millions in Offshore Accounts
Wall Street Journal, 03.09.2016

Scott Michel Comments on DOJ's Latest Offshore Efforts Focusing on UBS Accounts in Singapore
Tax notes, 03.07.2016

BNA Bloomberg Daily Tax Report Quotes Charles Ruchelman on Treasury/FinCEN's Proposed FBAR Regulation
Daily Tax Report, 03.03.2016

Scott Michel Comments on Attorney Confidentiality FATCA Exemption
Daily Tax Report, 03.01.2016

Worldwide Tax Daily Quotes Mark Matthews on Gap Between FBAR Filing and Number of U.S. Citizens Living Abroad
Worldwide Tax Daily, 02.29.2016

Law360 Quotes David Rosenbloom on Binding Arbitration Provision in Model Tax Treaty
Law360, 02.26.2016

Worldwide Tax Daily Quotes David Rosenbloom on the Revised U.S. Model Tax Convention
Worldwide Tax Daily, 02.18.2016

Bloomberg Quotes David Rosenbloom on Europe Going After Google and Others for Paying Minimal Taxes
Bloomberg Business, 02.18.2016

Financial Planning Journal Quotes Scott Michel on U.S. Becoming the World's Favorite New Tax Haven
Financial Planning Journal, 02.16.2016

Global Investigation Review Quotes Mark Matthews on IRS's Criminal Investigation Division
Global Investigation Review, 02.05.2016

Tax Notes Quotes Charles Ruchelman on New Tax Laws for Partnerships at D.C. Bar Panel
Tax Notes Today, 02.03.2016

Bloomberg BNA Quotes Charles Ruchelman on New Partnership Tax Examination and Collection Statute
Bloomberg BNA, 02.03.2016

Caplin & Drysdale Promotes Attorneys in D.C. and New York
Press Release | *Caplin & Drysdale*, 02.01.2016

Scott Michel Comments on U.S. Becoming the World's Favorite New Tax Haven
Bloomberg Businessweek, 01.27.2016

Bloomberg BNA Quotes Scott Michel on How a Global Push to Combat Tax Evasion Led to an Influx of Information
Bloomberg BNA, 01.12.2016

Tax Notes Quotes Mark Matthews on Justice Department's Investigation of Swiss Banks
Tax Notes, 01.04.2016

Scott Michel Comments on the Trends in IRS Criminal Enforcement
Tax Notes, 12.21.2015

Scott Michel Discusses U.S. Non-Prosecution Agreements Not Protecting Related Companies
Tax Notes, 12.14.2015

Tax Notes Quotes David Rosenbloom on the U.S. Model Tax Treaty
Tax Notes, 11.30.2015

Tax Notes Quotes Chris Rizek on Tax Practitioner Privilege
Tax Notes Today, 11.24.2015

Washingtonian Names Caplin & Drysdale Attorneys Among Washington's Top Lawyers Both | 11.19.2015

Law360 Quotes Mark Allison on 5 Things Keeping Tax Attorneys Up At Night
Law360, 11.17.2015

U.S. News & World Report Lists Caplin & Drysdale in "Best Law Firms" for 2016 Awards & Rankings | 11.02.2015

Mark Matthews Comments on IRS' Pursuit and Prosecution of U.S. Tax Evaders in Countries Outside of Switzerland
Tax Notes Today, 10.27.2015

Caplin & Drysdale's Transfer Pricing Team Receives International Award Awards & Rankings | 10.20.2015

Niles Elber Comments on "Super Penalty" for Offshore Accountholders With Banks on IRS's Bad Bank List
Tax Notes, 10.14.2015

Scott Michel Comments on Disclosure of Singapore and Israeli Bank Information re U.S. Accountholders
Bloomberg BNA's White Collar Crime Report, 10.09.2015

David Rosenbloom Comments on BEPS Action 2: The Hybrid Hydra
Tax Notes Today, 10.06.2015

Niles Elber Comments on New Insights Into IRS Offshore Voluntary Disclosure Program
Tax Notes, 10.05.2015

Bloomberg Quotes David Rosenbloom: Google to Apple Could See Tax Loopholes Curbed in OECD Proposal
Bloomberg Business, 10.05.2015

Mark Allison Comments on Chief Counsel's Recommended Changes to Tax Court Rules
Standard Federal Tax Reports, 10.01.2015

Tax Notes Quotes Chris Rizek on IRS Transparency Versus Confidentiality
Tax Notes Today, 09.23.2015

Mark Allison Talks to Tax Notes on IRS Suggested Changes to Tax Court Rules
Tax Notes Today, 09.23.2015

Chris Rizek Comments on IRS Transparency
Bloomberg's Daily Tax Report, 09.23.2015

Caplin & Drysdale Lawyers Listed Among NY's Super Lawyers®
Both | *Caplin & Drysdale*, 09.16.2015

Mark Matthews Comments on IRS Credit Card Initiative and Swiss Bank Program for Offshore Compliance
Tax Notes Today, 08.18.2015

H. David Rosenbloom Comments on Questions Remaining on BEPS, U.S. Model Treaty Changes
International Tax Monitor, 08.14.2015

International Tax Monitor Quotes Patricia Lewis on Advance Pricing Agreements
Daily Tax Report and International Tax Monitor, 08.12.2015

Financial Times Talks to Mark Matthews on Offshore Crackdown Returns
Financial Times, 08.09.2015

Tax Notes Today Quotes Scott Michel on Enforcement Efforts Turning Toward 'Leavers'
Tax Notes Today, 08.05.2015

The American Lawyer Names Caplin & Drysdale Global Legal Award Recipient for Swiss Tax Investigations Awards & Rankings | *The American Lawyer*, 07.31.2015

David Rosenbloom Comments on *Altera Corp v. Commissioner* and the Arm's Length Standard
International Tax Monitor, 07.31.2015

Worldwide Tax Daily Quotes Mark Matthews on Jonathan Pollard and the FBAR Hammer Penalty
Worldwide Tax Daily, 07.30.2015

Caplin & Drysdale's International Tax Group Earns Top Honors for Second Consecutive Year Awards & Rankings | *The Legal 500*, 07.29.2015

Caplin & Drysdale Lawyers Listed Among World's Leading Women in Business Law Awards & Rankings | *Expert Guides*, 07.28.2015

Wall Street Journal Quotes Scott Michel on IRS's Probe of Singapore Firm
The Wall Street Journal, 07.19.2015

Law360 Quotes Mark Allison on Tax Cases to Watch in the 2nd Half of 2015
Law360, 07.13.2015

David Rosenbloom Comments on U.S.-Vietnam Income Tax Treaty
Worldwide Tax Daily, 07.09.2015

David Rosenbloom Comments on Baseball-Style Mandatory Binding Arbitration
Tax Notes Today, 07.09.2015

U.S. Court of Appeals Rules in Favor of Pro-Israel Organization in IRS Discriminatory "Israel Special Policy" Case
Press Release | 06.23.2015

Law360 Quotes Charles Ruchelman on IRS Hiring Outside Litigators
Law360, 06.18.2015

Patricia Lewis Discusses OECD Discussion Draft at Transfer Pricing Conference
International Tax Monitor, 06.12.2015

Caplin & Drysdale Named Top Tier Firm for Tax Controversy
Both | 06.08.2015

David Rosenbloom Comments on OECD's BEPS Proposals in Europe
Tax Notes Today, 06.08.2015

Bloomberg BNA Quotes Scott Michel on New FBAR Penalty Limits and Eighth Amendment Litigation
Tax Analysts, 06.05.2015

Tax Analysts Speaks to Scott Michel: FBAR Penalty Guidance Reflects Sensitivity to U.S. Constitutional Concerns
Tax Analysts, 06.02.2015

David Rosenbloom Comments on U.S. Model Tax Treaty Proposals
Tax Notes Today, 05.22.2015

Clients and Peers Distinguish Caplin & Drysdale in Chambers' Rankings
Awards & Rankings | *Chambers USA*, 05.19.2015

Law360 Quotes Mark Allison on High Court Levels Individual, Corporate Taxes in Md. Ruling
Law360, 05.18.2015

Bloomberg BNA Quotes David Rosenbloom on Grand Jury Probe in Caterpillar Case
Bloomberg BNA, 05.13.2015

Scott Michel Comments on Taxpayers Seeking Entry To OVDP
Bloomberg BNA, 05.12.2015

Scott Michel Comments on U.S. Caterpillar Criminal Tax Inquiry
Worldwide Tax Daily, 05.08.2015

Scott Michel Featured on Nightly Business Report's Whistleblower Series
CNBC, 05.07.2015

Clark Armitage Comments on Adverse EU State Aid Ruling and Apple
Worldwide Tax Daily, 05.01.2015

Bloomberg Quotes David Rosenbloom on 15th Annual Tax Lecture Series
Bloomberg BNA, 04.30.2015

Scott Michel Comments on the End of Offshore Bank Secrecy
CNBC, 04.30.2015

Scott Michel Discusses Tax Crime Penalties and Remedies

The Washington Post Magazine, 04.27.2015

Super Lawyers Lists Caplin & Drysdale Lawyers

Both | *Caplin & Drysdale*, 04.23.2015

Charles Ruchelman Comments on How Moore Answers Novel FBAR Questions

Tax Notes Today, 04.14.2015

David Rosenbloom Named "Best of the Best USA" by Expert Guides

Awards & Rankings | *Expert Guides*, 04.10.2015

Law360 Quotes Mark Allison on 7 Tips for Dealing With a Cash-Strapped IRS

Law360, 04.10.2015

Caplin & Drysdale's White Collar Defense Practice Earns Recognition

Awards & Rankings | *Corporate LiveWire*, 04.09.2015

Scott Michel Comments on War on Tax Cheats

The Hill, 04.08.2015

Charles Ruchelman Comments on IRS Unprecedented Hiring of Private Law Firm

Law360, 04.06.2015

Worldwide Tax Daily Quotes Mark Matthews on FATCA: Swatting Flies With Atom Bombs

Worldwide Tax Daily, 04.02.2015

Tax Notes Today Quotes Christopher Rizek: Court Remands FOIA Case Over Wikileaks Cables

Tax Notes Today, 04.02.2015

Tax Notes Today Quotes Christopher Rizek on New Legislative Fix to Loving, Ridgely on Horizon

Tax Notes Today, 04.01.2015

Christopher Rizek Comments on Federal District Court Orders IRS to Improve Response to Nonprofit's FOIA Requests

Tax Notes Today, 04.01.2015

Worldwide Tax Daily Quotes David Rosenbloom on Arbitration in International Tax Matters

Worldwide Tax Daily, 03.31.2015

Scott Michel Comments on Impact of First Swiss Bank to Settle Under U.S. Tax Program

Thomson Reuters, 03.30.2015

The Daily Tax Report Quotes Scott Michel: Swiss Bank Agrees to Pay U.S. \$211 Million to Avoid Prosecution for Aiding Tax Evasion

Daily Tax Report, 03.30.2015

WSJ Talks to Scott Michel About Tax Fraud

The Wall Street Journal, 03.13.2015

CNN Quotes Scott Michel on the Taxation of American Minors Living Abroad

CNN Money, 03.11.2015

Daily Tax Report Quotes Charles Ruchelman on IRS Aiming to Audit C Corporations, Large Partnerships at Similar Rates

Daily Tax Report, 02.26.2015

Daily Tax Report Quotes Scott Michel on the American Bar Association's OVDP Webinar

Daily Tax Report, 02.24.2015

Scott Michel Comments on Offshore Enforcement Issues Regarding HSBC and UBS

LAW360, 02.13.2015

International Tax Monitor Quotes Scott Michel: Obama Proposal to Require FATCA Reporting to Account Holders

Bloomberg BNA, 02.03.2015

Caplin & Drysdale Elects Three New Members

Press Release | *Caplin & Drysdale*, 02.02.2015

Bloomberg Quotes David Rosenbloom on 'Dynamic Scoring

Bloomberg BNA, 01.22.2015

Clark Armitage Comments on European Commission Details Challenging Luxembourg's Amazon Ruling

Worldwide Tax Daily, 01.20.2015

Mark Allison Comments on MoneyGram Bank Ruling Will Keep Financial Cos. On Alert

LAW360, 01.15.2015

LAW360 Quotes Christopher Rizek and Rachel Partain: IRS Grip On Tax Preparers Will Weaken Without Legislation

LAW360, 01.13.2015

David Rosenbloom Comments on Dynamic Scoring of Tax Measures

The Washington Post, 01.11.2015

Mark Matthews Comments on International Tax and Financial Regulatory Agenda

Worldwide Tax Daily, 01.06.2015

WSJ Quotes Scott Michel on \$400 Million Bank Leumi Settlement

The Wall Street Journal, 01.02.2015

David Rosenbloom Comments on Hong Kong Banks Avoiding FATCA

Worldwide Tax Daily, 12.19.2014

David Rosenbloom Comments on Proposed Improvements to Treaty Dispute Resolution Process

Worldwide Tax Daily, 12.19.2014

The Wall Street Journal Quotes Mark Matthews: Why Does Uncle Sam Hate American Expats?

The Wall Street Journal, 12.15.2014

Caplin & Drysdale Attorneys Featured in Newsweek: How Google and Apple Make Their Taxes Disappear

Newsweek, 12.14.2014

Law360 Quotes Kirsten Burmester: As FATCA Slowly Rolls Out, Its Impact Is Uneven

Law360, 11.20.2014

David Rosenbloom Comments on IRS Releasing Final Regulations on Gain Recognition Agreements
Worldwide Tax Daily, 11.19.2014

Michael Pfeifer and Kirsten Burmester Comment on Tax Returns of Americans Living Abroad Under Scrutiny
MainStreet, 11.10.2014

Scott Michel Comments on U.S. Strengthening International Tax Enforcement Efforts
Worldwide Tax Daily, 11.07.2014

Worldwide Tax Daily Quotes Victor Jaramillo: IRS Working with SSA on Offshore Streamlined Filing Requirement
Worldwide Tax Daily, 11.07.2014

Victor Jaramillo Comments on Non-Willful Conduct Under Streamlined OVDP
Bloomberg BNA, 11.07.2014

Caplin & Drysdale Receives High Rankings from 2015 U.S. News-Best Law Firms Awards & Rankings | *U.S. News - Best Lawyers*, 11.04.2014

CNBC Quotes Scott Michel: Tax Dodgers Should Not Be Heartened by This Verdict
CNBC, 11.04.2014

Worldwide Tax Daily Quotes Neal Kochman: Amazon U.S. Tax Court Trial Gets Underway
Worldwide Tax Daily, 11.03.2014

David Rosenbloom Comments on OECD Options for Preventing Artificial Avoidance of PE Status
Worldwide Tax Daily, 11.03.2014

David Rosenbloom Comments on BEPS Discussion Draft Including Intra-Group Service Fees
Bloomberg BNA, 11.03.2014

Neal Kochman Comments on Amazon Case Challenging IRS Income Method for Valuing Intangibles
Bloomberg BNA, 10.30.2014

Newsweek Quotes Mark Allison: Settlements Are Tax Write-Offs for Banks
Newsweek, 10.27.2014

Christopher Rizek Comments on Expert Witness 'Hot Tubbing'
Tax Notes Today, 10.20.2014

Caplin & Drysdale Lawyers Listed Among World's Leading Tax Advisers Awards & Rankings | *Expert Guides*, 10.16.2014

Clark Armitage Comments on the EU's Investigation of Amazon Tax Ruling for State Aid Breach
Worldwide Tax Daily, 10.08.2014

On the Eve of IFA-Mumbai, Bloomberg Interviews Scott Michel and David Rosenbloom: FATCA Strengthens U.S. Tax Enforcement Hand in India
Daily Tax Report and International Tax Monitor, 10.08.2014

Fortune Lists Caplin & Drysdale Lawyers Among Leaders in the Law Awards & Rankings | *Fortune Magazine*, 10.06.2014

Clark Armitage Comments on EU State Aid Cases Against Apple and Fiat
Tax Analysts, 10.01.2014

Caplin & Drysdale's International Tax Group Earns Top Award from Legal 500 Awards & Rankings | *Caplin & Drysdale*, 09.23.2014

Niles Elber Discusses More Guidance Coming on Modified OVDP and Streamlined Filing *Worldwide Tax Daily*, 09.23.2014

Mark Allison Comments on Privilege Case's Importance *Tax Notes Today*, 09.22.2014

Scott Michel Comments on Questions Surrounding Standards of Willful Conduct Under Streamlined Version of OVDP *Daily Tax Report*, 09.18.2014

Scott Michel Offers Insights on The DOJ's Swiss Bank Program and Coming Enforcement *Le Temps*, 09.16.2014

CNBC Quotes Scott Michel: Tough Tax Rules See Expats Ditch Their U.S. Passports *CNBC*, 09.11.2014

David Rosenbloom Comments on Domestic FATCA Requirements Possibly Complicating Compliance *International Tax Monitor*, 08.27.2014

Fortune Magazine Lists Patricia Lewis and Richard Skillman as Top Rated Lawyers Awards & Rankings | *Fortune Magazine*, 08.25.2014

Caplin & Drysdale Lawyers Earn Best Lawyers Ranking Awards & Rankings | 08.21.2014

David Rosenbloom's FATCA Interview Makes Headlines in Brazil *Jornal do Comércio (Journal of Commerce)*, 08.18.2014

The International Tax Review Quotes Mark Allison: Phase II of the AJAC May Increase U.S. Litigation *International Tax Review*, 08.13.2014

Mark Allison Comments on IRS Finalizing Material Advisor Regulations *CCH Standard Federal Tax Reports*, 08.07.2014

Niles Elber Discusses Criminal Sentencing Developments *Tax Notes Today*, 07.31.2014

Guide to World's Leading Women in Business Law Lists Caplin & Drysdale Lawyers Awards & Rankings | *Expert Guides*, 07.29.2014

Bloomberg BNA Quotes David Rosenbloom and Peter Barnes: Could the White House Act Unilaterally on Taxes? *Bloomberg BNA*, 07.25.2014

With Its Founders, Caplin & Drysdale Celebrates 50 Years of Excellence Press Release | *Caplin & Drysdale*, 07.23.2014

Patricia Lewis Named "Best of the Best" in Transfer Pricing Awards & Rankings | *Expert Guides*, 07.15.2014

Tax Notes Today Quotes Christopher Rizek: Tax Pros Balance Confidence in Koskinen Against IRS's Troubles *Tax Notes Today*, 07.15.2014

Worldwide Tax Daily Quotes Mark Matthews: IRS Investigators to Focus on Cybercrime, Virtual Currency
Worldwide Tax Daily, 07.09.2014

Mark Matthews Comments on Landmark Tax Evasion Law
POLITICO, 07.09.2014

Niles Elber Earns Martindale AV-Rating
Awards & Rankings | *Martindale-Hubbell*, 07.08.2014

Tax Analysts Quotes Clark Armitage on IRS Resignations Affecting U.S.-India Talks on MAP Cases
Tax Analysts, 07.08.2014

Tax Notes Today Quotes Christopher Rizek on Taxpayers' Rights to Damages
Tax Notes Today, 07.05.2014

Clients and Peers Recommend Caplin & Drysdale in 2014 Legal 500 Ranking
Awards & Rankings | *The Legal 500*, 07.01.2014

Wall Street Journal Quotes Scott Michel on the Hazards of Offshore-Account Disclosure
The Wall Street Journal, 06.27.2014

The Economist Quotes Mark Matthews on Campaign Against Tax Cheats
The Economist, 06.26.2014

CCH Standard Federal Tax Reports Quotes Mark Allison: Supreme Court Clarifies Standard for Challenges to IRS Summons
CCH Standard Federal Tax Reports, 06.26.2014

Bloomberg BNA Quotes Scott Michel on Streamlined Penalty Structure Available to Those in OVDP
Bloomberg BNA, 06.24.2014

Worldwide Tax Daily Quotes Scott Michel on Updated OVDP
Worldwide Tax Daily, 06.23.2014

Bloomberg Quotes Scott Michel: IRS Boosts Pressure for Disclosure of Offshore Accounts
Bloomberg News, 06.19.2014

Bloomberg's International Tax Monitor Quotes Scott Michel: IRS Expands Relief for Disclosure, Tightens Rules for Neglect
International Tax Monitor, 06.18.2014

LAW360 Quotes Mark Allison: High Court Could Dim IRS Summons Power
Law360, 06.11.2014

Tax Notes Today Quotes Christopher Rizek: Previous Taxpayer Rights Bills Offer Lessons for Current Efforts
Tax Notes Today, 06.10.2014

USA Today Quotes Christopher Rizek: The IRS Wants To Read You Your Rights
USA Today, 06.10.2014

Clients Choose Caplin & Drysdale as Transfer Pricing Law Firm of the Year in Washington, D.C.
Awards & Rankings | *Global Law Experts*, 06.09.2014

Bloomberg's International Tax Monitor Quotes Scott Michel: Time Extensions Welcome Under Non-Prosecution Program

International Tax Monitor, 06.06.2014

Patricia Lewis Named Best in Transfer Pricing for 2014

International Financial Law Review, Americas Women in Business Law Awards, 06.05.2014

Daily Tax Report Quotes Scott Michel on New Offshore Disclosure Program for U.S. Taxpayers

Daily Tax Report, 06.04.2014

Caplin & Drysdale Earns Top Honors in 2014 Chambers USA

Awards & Rankings | *Chambers USA*, 05.28.2014

The Wall Street Journal Quotes Scott Michel on the DOJ Bank Program and Implications for Global Financial Community

The Wall Street Journal, 05.27.2014

Reuters Quotes Mark Allison: MoneyGram Claims Bank Status in Tax Dispute with IRS

Reuters, 05.27.2014

Daily Tax Report Quotes Scott Michel on the Departure of DOJ Tax Division Chief Keneally

Bloomberg, 05.27.2014

Bloomberg Quotes Mark Matthews on Credit Suisse Plea Strengthening DOJ's Hand Against Swiss Banks

Bloomberg, 05.26.2014

Daily Tax Report Quotes Mark Matthews: U.S. Will Get Credit Suisse Account Names Despite Treaty Problems

Daily Tax Report, 05.21.2014

Scott Michel Comments on Credit Suisse's Guilty Plea

Swissinfo, 05.20.2014

The Wall Street Journal Quotes Scott Michel on Credit Suisse Plea

The Wall Street Journal, 05.20.2014

Swiss TV Interviews Scott Michel on Implications of Credit Suisse Plea

RTS Radio Television Suisse, 05.20.2014

David Rosenbloom Comments on Senator Paul's Objections to Tax Treaties

Worldwide Tax Daily, 05.09.2014

Worldwide Tax Daily Quotes Scott Michel: Credit Suisse Settlement May Be Benchmark for Future Cases

Bloomberg, 05.07.2014

Scott Michel Comments on Credit Suisse Tax Deal

Bloomberg, 05.06.2014

ABC News Quotes Mark Matthews: US to Use Tax Law on Russian Banks

ABC News, 05.06.2014

Scott Michel Comments on U.S.-Israel FATCA Agreement

Daily Tax Report, 05.02.2014

Tax Notes Today Quotes David Rosenbloom: EBay Accepts 'Buy It Now' Tax Price on \$9 Billion Repatriation

Tax Notes Today, 05.01.2014

The Washington Post Lists Caplin & Drysdale Attorneys Among the Top Attorneys in D.C. Awards & Rankings | *The Washington Post*, 04.30.2014

Tax Analysts Quotes Neal Kochman: Auditors Seeking More Information on Global Operations
Tax Analysts, 04.30.2014

NPR Quotes David Rosenbloom: Tax Breaks Could Be Biggest Prize in Pfizer Deal For AstraZeneca
NPR, 04.28.2014

CCTV America Interviews Scott Michel on FATCA's Role in Improving Global Tax System
CCTV America, 04.25.2014

Mark Allison Comments on Tax Court Decision
Federal Tax Weekly, 04.24.2014

The Wall Street Journal Quotes Scott Michel: New Risks for Advisers with Clients Who Own Unreported Overseas Assets
The Wall Street Journal, 04.21.2014

Tax Notes Today Quotes Mark Allison: Good-Faith Defense Waives Attorney-Client Privilege
Tax Notes Today, 04.17.2014

Tax Analysts Quotes David Rosenbloom: OECD's LOB Approach Needs Refinement, Practitioners Say
Worldwide Tax Daily, 04.15.2014

Tax Notes Today Quotes Kirsten Burmester: Toward a Solution to the PFIC Problem
Tax Notes Today, 04.14.2014

Tax Notes Today Quotes Mark Allison: Tax Court Retains Jurisdiction Over Worker Classification Case
Tax Notes, 04.04.2014

Transfer Pricing Weekly Quotes Patricia Lewis Regarding IRS Proposals to Revise APA and MAP Procedures
Transfer Pricing Weekly, 04.03.2014

Tax Notes Today Quotes Christopher Rizek: In Search of a Taxpayer Bill of Rights With Teeth
Tax Notes Today, 03.28.2014

Tax Notes Today Quotes David Rosenbloom: OECD Drafts Call for Domestic Law Solutions to Hybrid Mismatches
Tax Notes Today, 03.20.2014

Tax Notes Today Quotes Scott Michel: DOJ Doesn't See Barriers to Receipt of Information Under Swiss Bank Program
Tax Notes Today, 03.19.2014

Patricia Lewis Analyzes Proposed Revisions to U.S. APA and Competent Authority Procedures
Tax Analysts, 03.10.2014

Tax Notes Today Quotes Mark Matthews: DOJ May Investigate Swiss Banks That Were Qualified Intermediaries
Tax Notes Today, 03.07.2014

Charles Ruchelman Comments on Americans in Israel Targeted by IRS Tax Audits
The Jewish Daily Forward, 03.03.2014

Mark Matthews Discusses Credit Suisse Senate Hearing on Tax Evasion

Arise Xchange, 02.27.2014

Scott Michel Comments on the Credit Suisse Senate Hearing

Bloomberg News, 02.26.2014

Executive Leaders Radio Hosts David Rosenbloom

Executive Leaders Radio, 02.20.2014

Tax Notes Today Quotes David Rosenbloom: Senate Committee Announces Hearing on Pending Tax Treaties

Tax Notes Today, 02.20.2014

Tax Analysts' Worldwide Tax Daily Quotes Patricia Lewis: Proposed U.S. Competent Authority Procedures Could Complicate Issue Resolution

Tax Notes, 02.13.2014

Forbes Quotes Charles Ruchelman: Appellate Court Delivers Blow to IRS and Taxpayers, Nixing Tax Return

Preparer Regs

Forbes, 02.11.2014

Charles Ruchelman Comments on Israeli Bank Disclosures

02.03.2014

JNS.org Quotes Charles Ruchelman: Americans with Israeli Bank Accounts Could Face Troubling Tax Season

JNS.org, 01.13.2014

Caplin & Drysdale Strengthens Global Tax and Litigation Services

Press Release | 01.08.2014

Bloomberg Quotes Scott Michel and Mark Matthews: Swiss Banks Under Pressure as Deadline Nears for DOJ

Program to Find U.S. Accounts

Bloomberg, 12.20.2013

Swiss Banks Forced to Disclose Foreign Accounts and Transfers to U.S. Authorities

Press Release | 12.19.2013

Tax Directors Handbook Recommends Caplin & Drysdale As A Leading Tax Law Firm

Awards & Rankings | *Tax Directors Handbook*, 12.19.2013

POLITICO Quotes Scott Michel: Swiss Banks Urge U.S. Tax Dodgers to Come Clean to Beat Deadline

POLITICO, 12.17.2013

Patricia Lewis Comments on Concerns Over Revised APA and Competent Authority Procedures

Tax Notes, 12.13.2013

CCH Quotes Mark Allison: Supreme Court Upholds IRS's Application Of Valuation Misstatement Penalty To

Sham Transaction

CCH Federal Tax Weekly, 12.12.2013

Bloomberg Quotes Charles Ruchelman: IRS Will Move Quickly to Summonses Under New Document Request Procedures

Bloomberg, 12.12.2013

Tax Notes Quotes Mark Allison on Supreme Court Tax Shelter Case

Tax Notes, 12.04.2013

Forbes Quotes Charles Ruchelman: Supreme Court Sides With IRS In Tax Shelter Penalty Case

Forbes, 12.03.2013

Washingtonian Recognizes Caplin & Drysdale Attorneys Among Washington's Best Lawyers

Awards & Rankings | *Washingtonian Magazine*, 12.03.2013

Patricia Lewis and David Rosenbloom are Listed Among World's Leading Transfer Pricing Advisers

Awards & Rankings | *Expert Guides*, 11.15.2013

WSJ Interviews Scott Michel on U.S. Government Seeking Information from U.S. Banks

The Wall Street Journal, 11.15.2013

NYTimes quotes Mark Allison on U.S.-France Tax Evasion Agreement

The New York Times, 11.14.2013

NYTimes Quotes Scott Michel: Bank Records Sought in Offshore Tax Inquiry

The New York Times, 11.12.2013

Scott Michel Speaks with Swiss TV Regarding John Doe Summons and ZKB

ECO, 11.11.2013

Caplin & Drysdale Lawyers Listed in World's Leading Women in Business Law

Awards & Rankings | *Expert Guides*, 11.08.2013

WSJ Quotes Mark Allison on Benefits to U.S. Companies Complying with Tax Authorities

The Wall Street Journal, 11.08.2013

Bloomberg Quotes Scott Michel Regarding IDR Response Deadlines

Bloomberg, 11.07.2013

Worldwide Tax Daily Quotes Scott Michel: Swiss Court Orders Banks to Give Ex-Employees Copies of Data Shared With U.S.

Worldwide Tax Daily, 11.04.2013

Wall Street Journal Quotes Scott Michel: More U.S. Taxpayers Admit to Secret Swiss Accounts

The Wall Street Journal, 11.01.2013

DOJ Deal with Swiss Banks Impacts U.S. Taxpayers and Financial Firms Around the World

Press Release | 10.31.2013

Mark Matthews Talks to Tax Notes About Creating Greater Flexibility in the Offshore Voluntary Disclosure Program

Tax Notes, 10.28.2013

19 Caplin & Drysdale Attorneys Achieve Best Lawyers in America Ranking

Awards & Rankings | *U.S. News & World Report*, 10.21.2013

Worldwide Tax Daily Quotes Scott Michel: Swiss Bank Ends Operations, Citing U.S.-Swiss Tax Dispute

Worldwide Tax Daily, 10.21.2013

Tax Notes Quotes Scott Michel: IRS Auditors Take Closer Look at 'Quiet' Disclosures of Offshore Accounts

Tax Notes, 10.18.2013

Tax Notes Today Quotes Scott Michel: Swiss Bankers Voice Concerns Over DOJ Compliance Program
Tax Notes Today, 10.11.2013

CLIENT ADVISORY: Caplin & Drysdale Comments on the Government Shutdown's Impact on Business and Individual Taxpayers
Caplin & Drysdale, 10.10.2013

Tax Notes Today Quotes Mortimer Caplin and Christopher Rizek: IRS Shutdown Adds to Economic Headwinds for Businesses, Individuals
Tax Notes Today, 10.09.2013

Caplin & Drysdale Enhances Tax Practice with Three Lateral Hires
Press Release | 10.01.2013

New York Times Quotes Mark Matthews: Complying with U.S. Tax Evasion Law is Vexing Foreign Banks
New York Times, 09.16.2013

CCH Quotes Mark Allison: Seventh Circuit Upholds Valuation Misstatement Penalty
CCH Federal Tax Weekly, 09.05.2013

CNN Money Quotes Scott Michel: Americans Turn In Passports As New Tax Law Hits
CNN Money, 09.05.2013

World Tax Lists Caplin & Drysdale as a Global Tax Leader
Awards & Rankings | *International Tax Review*, 09.03.2013

Reuters Quotes Scott Michel on U.S. – Swiss Bank Deal
Reuters, 09.03.2013

Scott Michel Speaks with Bloomberg on DOJ's Tax Deal with Swiss Banks to Reveal U.S. Account Information
Bloomberg BNA's Daily Tax Report, 08.30.2013

Scott Michel Speaks with German Radio Regarding U.S.-Swiss Tax Deal
SRF Radio, 08.30.2013

Mark Matthews, Scott Michel and Cono Namorato Comment On U.S.-Swiss Tax Agreement
Thomson Reuters, International Taxes Weekly, 08.30.2013

Mark Matthews Comments on U.S.-Swiss Program to Combat Tax Evasion
Tax Notes, 08.30.2013

U.S.-Swiss Tax Deal Impacts U.S. Account Holders and Dozens of Swiss Financial Institutions
Press Release | 08.29.2013

South China Morning Post Quotes Scott Michel: Tax Evaders Feel the Heat in Havens
South China Morning Post, 08.24.2013

CCH Quotes Mark Matthews on Government's Power to Compel Records of Foreign Bank Accounts
CCH, 08.21.2013

Ex-Qwest CEO Nacchio Seeks Tax Refund as Prison Term Ends
Bloomberg, 08.20.2013

Patricia Lewis Listed Among Global Tax Controversy Leaders for 2013
Awards & Rankings | *Tax Controversy Leaders*, 08.13.2013

The Wall Street Journal Quotes Scott Michel: As U.S. Expats Balk at Tax Law, Asia Sees a Shift
The Wall Street Journal, 08.12.2013

New York State Tax Crackdown Requires Prompt Action on Past-Due Taxes
Press Release | 08.07.2013

Tax Notes Quotes Mark Allison: Tax Court Strikes Down John Hancock's LILO/SILO Transactions
Tax Notes, 08.06.2013

Scott Michel Talks to Tax Notes About FBAR Compliance
Tax Notes, 08.05.2013

Reuters Quotes Scott Michel: U.S., Liechtenstein Bank Reach Settlement in Tax Evasion Case
Reuters, 07.31.2013

The Wall Street Journal Quotes Scott Michel on Efforts to Identify Norwegian Tax Evaders
The Wall Street Journal, 07.30.2013

Vault Ranks Caplin & Drysdale a Top Tax Practice for 2014
Awards & Rankings | *Vault*, 07.16.2013

Patricia Lewis Moderates Transfer Pricing Panel Discussion
Bloomberg, 07.15.2013

Scott Michel Speaks to Swiss Radio: Swiss Finance Minister Proposes Permits for Swiss Banks to Hand Over Data to U.S.
World Radio Switzerland, 07.04.2013

Chicago Tribune Quotes David Rosenbloom: IRS Battles Tech Companies Over 2004 Offshore Tax Holiday
Chicago Tribune, 07.02.2013

Scott Michel Speaks to Tax Notes: Swiss Court Blocks Credit Suisse From Sharing Ex-Employee's Data With U.S.
Tax Notes, 07.01.2013

Washington Jewish Week Quotes Charles Ruchelman on IRS Scrutiny of U.S. Citizens' Bank Accounts in Israel
Washington Jewish Week, 06.28.2013

The Wall Street Journal Speaks to Mark Matthews on Former Swiss Banker Hiding Own Accounts
The Wall Street Journal, 06.28.2013

Swiss TV Interviews David Rosenbloom: Swiss Parliament Pushes Back on U.S. Banks Deal
Radio Télévision Suisse, 06.19.2013

Scott Michel Speaks in Kuwait City at FATCA Seminar
06.18.2013

The Wall Street Journal Quotes Scott Michel: Swiss Parliament Pushes Back on U.S. Banks Deal
The Wall Street Journal, 06.18.2013

David Rosenbloom Testifies Before the Canadian Parliament on Proposed Tax Agreements
Parliament of Canada, House of Commons Standing Committee on Finance, 06.17.2013

Caplin & Drysdale Comments on ICIJ's Offshore Leaks Database
Press Release | 06.17.2013

Caplin & Drysdale Creates Simplified Tax Guide to Help Employers Hiring Veterans
06.17.2013

Bloomberg Quotes Mark Matthews on Potential Issues for New IRS Commissioner
Bloomberg's Daily Tax Report, 06.13.2013

Scott Michel Quoted Regarding U.S. Finding Jurisdiction for Foreign Bank Prosecutions
Tax Notes, 06.10.2013

Scott Michel and David Rosenbloom Quoted on Recent U.S. Efforts to Tackle Offshore Tax Evasion
Tax Notes, 06.10.2013

Scott Michel and Michael Pfeifer Selected for Legal Tax Advisory Board
06.10.2013

Bloomberg Quotes Christopher Rizek on Tax Shelter Enforcement
Bloomberg, 06.07.2013

The Legal 500 Recommends Caplin & Drysdale As a Leading Firm For 2013
Awards & Rankings | *The Legal 500*, 06.03.2013

Radio Télévision Suisse Interviews David Rosenbloom About Swiss Banking Agreement with the U.S.
Radio Télévision Suisse, 05.30.2013

Swiss Media Quotes David Rosenbloom: Swiss Banking Deal Aims to End Tax Dispute with U.S.
Tages-Anzeiger, 05.30.2013

14 Caplin & Drysdale Attorneys Recognized in Chambers USA 2013
Awards & Rankings | *Chambers USA*, 05.29.2013

Scott Michel Comments on Actions of Swiss Government to Authorize Banks to Disclose Information
New York Times, 05.29.2013

The Wall Street Journal Quotes Scott Michel: Swiss Bow to Pressure for More Bank Data
The Wall Street Journal, 05.29.2013

Tax Notes Quotes Patricia Lewis Regarding New OECD Transfer Pricing Safe Harbor Guidelines
Tax Notes, 05.22.2013

Bloomberg Interviews David Rosenbloom Regarding Apple's Tax Strategy
Bloomberg, 05.21.2013

David Rosenbloom Comments on Senate Committee Hearing Highlighting Apple's Offshore Accounts
MacNewsWorld, 05.17.2013

Scott Michel Quoted by Tax Notes on Impact of IRS Scandal
Tax Notes, 05.17.2013

CNBC Speaks to Charles Ruchelman About the Surge in IRS Audits of the Wealthy
CNBC, 05.13.2013

Bloomberg BNA Quotes Scott Michel Regarding Tax Evasion
Bloomberg BNA, 05.10.2013

Scott Michel and David Rosenbloom Quoted On the Impact of Offshore Tax Evasion
CardHub.com, 05.10.2013

Wealthy Americans Target of New IRS Initiative

Caplin & Drysdale, 05.07.2013

Tax Notes Quotes Mark Matthews on the State of Voluntary Disclosures

Tax Notes, 05.06.2013

Scott Michel and David Rosenbloom Cited in Canadian Report on Tax Evasion

Canadian House of Commons - Report on the Standing Committee on Finance, 05.01.2013

Scott Michel is Quoted on U.S. Efforts to Combat Offshore Tax Evaders

Fox Business, 05.01.2013

Super Lawyers Lists Nineteen Caplin & Drysdale Attorneys

Awards & Rankings | *Super Lawyers*, 04.29.2013

Mark Allison Quoted in CCH Regarding U.S. Virgin Islands Tax Controversy

CCH, 04.25.2013

Tax Notes Quotes Charles Ruchelman on COFC Program Hosted by Caplin & Drysdale

Tax Notes, 04.24.2013

China Radio International Speaks With David Rosenbloom Regarding Tax Day in the U.S.

Beyond Beijing, 04.15.2013

Scott Michel Talks to The Wall Street Journal About Hiding Offshore Accounts From Advisers

The Wall Street Journal, 04.11.2013

The Fiscal Times Quotes Charles Ruchelman on Why More Affluent Americans Pay No Taxes

The Fiscal Times, 04.11.2013

The Wall Street Journal Quotes Scott Michel: Luxembourg to Reveal Bank Data

The Wall Street Journal, 04.10.2013

CCTV America Talks With Scott Michel About Offshore Bank Account Inquiries

CCTVAmerica, 04.10.2013

The Wall Street Journal Quotes Scott Michel: Tax Havens Shift as Luxembourg Loosens Bank Secrecy

The Wall Street Journal, 04.10.2013

Tax Notes Quotes Mark Allison on Professional Golfer's Endorsement Income Allocation

Tax Notes, 04.08.2013

Tax Notes Quotes Mark Allison on Supreme Court Ruling in COBRA Tax Shelter Case

Tax Notes, 03.26.2013

Scott Michel Talks to Tax Notes, U.S. Requests Liechtenstein Data

Tax Notes, 03.26.2013

Scott Michel and David Rosenbloom Comment on Americans with Asian Bank Accounts

Bloomberg, 03.25.2013

Mark Allison Quoted by CCH Regarding Tax Court Valuation Misstatement Penalty

CCH, 03.21.2013

Tax Notes Quotes Mark Matthews on IRS's Enforcement Efforts

Tax Notes, 03.21.2013

Caplin & Drysdale Attorneys Recognized by Peers in Best Lawyers in America Awards & Rankings | 03.18.2013

Caplin & Drysdale Lawyers Alert International Athletes to Beware Endorsement Tax Issues Press Release | 03.18.2013

Tax Notes Quotes Mark Allison on Gross Valuation Penalty *Tax Notes*, 03.18.2013

PODCAST: IRS Targeting Tax Havens in Singapore and Hong Kong *Accounting Today*, 03.12.2013

Mark Matthews is Quoted Regarding Government's Crackdown on Non-Swiss Banks *SonntagsZeitung*, 03.10.2013

WSJ Quotes Mark Matthews on Increased Scrutiny of Offshore Accounts *The Wall Street Journal*, 03.06.2013

The Jewish Chronicle Quotes Charles Ruchelman on IRS' Probe of Israeli Bank Account Holders *The Jewish Chronicle*, 03.05.2013

The Jewish Observer Quotes Charles Ruchelman on Americans with Israeli Bank Accounts *The Jewish Observer, Los Angeles*, 03.03.2013

Caplin & Drysdale Receives Tax Awards Awards & Rankings | 02.27.2013

The Wall Street Journal Quotes Mark Allison on \$1 Billion Dow Tax Shelter Case *The Wall Street Journal*, 02.27.2013

Scott Michel Quoted in The Wall Street Journal, A Dip Into Swiss Secrecy Rules *The Wall Street Journal*, 02.22.2013

VIN News Quotes Charles Ruchelman Concerning IRS Crackdown on Israeli Bank Accounts *VIN News*, 02.22.2013

Mark Allison Quoted in Tax Notes, Practitioners Parse Promoters' Wins in Sale-Leaseback Tenant Improvements Transaction *Tax Notes*, 02.12.2013

Mark Matthews Quoted in Tax Analysts, U.S. Appeals Court Dismisses Suit by 'Tax Cheats' Against UBS *Tax Analysts*, 02.11.2013

WSJ Quotes Mark Matthews on UBS Clients' Lawsuit 02.08.2013

WSJ Quotes Scott Michel on U.S. Crackdown of Offshore Tax Evasion 01.31.2013

Mark Matthews Quoted in Tax Analysts, Saving the Fifth Amendment From an Aging Loophole *Tax Analysts*, 01.23.2013

Mark E. Matthews Quoted in Tax Notes, Will U.S. Hypocrisy on Information Sharing Continue? *Tax Notes*, 01.21.2013

Neal Kochman Comments on Amazon's IRS Dispute
01.15.2013

Tax Notes Quotes Mark Allison on ConEd Case
Tax Notes, 01.10.2013

Tax Notes Names Scott Michel Among the Top 10 in Tax Community for 2012
01.09.2013

NPR Talks to Scott Michel About Implications of Wegelin Guilty Plea
01.08.2013

Scott Michel Interviewed by Geneva's "Le Temps" Regarding Wegelin Guilty Plea
01.07.2013

Chris Rizek and Scott Michel Comment on Wegelin Guilty Plea
01.06.2013

Caplin & Drysdale Alum Confirmed to U.S. Tax Court Judgeship
01.01.2013

Scott Michel and Mark Matthews Join American Citizens Abroad
12.26.2012

Mark Matthews Quoted in Tax Notes, Defense Bar Questions Government Wins on Required Records Doctrine
Tax Notes, 12.17.2012

Mark Matthews Quoted in Tax Notes, CI Officials Debate Focus on Stolen Identity Refund Fraud
Tax Notes, 12.17.2012

Mark Allison Quoted in Tax Notes, Court Reverses Convictions of 2 Former E&Y Shelter Promoters
Tax Notes, 12.03.2012

Patricia G. Lewis Discusses Bilateral Safe Harbors in Tax Management Transfer Pricing Report
Tax Management Transfer Pricing Report, 11.29.2012

Scott Michel Quoted in Tax Notes, Whistleblower Referrals Leading to CI, DOJ Investigations
Tax Notes, 11.19.2012

Scott Michel Discusses Plea Agreement of former UBS banker Christos Bagios
Tax Notes, 11.12.2012

U.S. News Recognizes Caplin & Drysdale With Top Ranking
Awards & Rankings | 11.08.2012

Scott Michel Quoted in the Wall Street Journal on Expatriate Foreign Bank Accounts
Wall Street Journal, 10.19.2012

Mark Allison Elected to American College of Tax Counsel
Caplin & Drysdale, 10.02.2012

Caplin & Drysdale Announces Expansion of Tax Practice and Relocation of New York Office
Both | 09.20.2012

Mark Matthews Quoted in Reuters, Overseas Tax Dagnet Refocuses on Country Partnerships
Reuters, 09.18.2012

Mark Matthews Quoted in Reuters, U.S. Justice Department Speeding Arrests of Tax Refund Thieves
Reuters, 09.18.2012

Scott Michel Quoted in Epoch Times, Swiss Banks Stand to Lose Hundreds of Billions
Epoch Times, 09.17.2012

Christopher Rizek Quoted in Law360, IRS' \$104M Whistleblower Award May Curb In-House Reporting
Law360, 09.12.2012

Mark Matthews Quoted in Tax Notes, For DOJ Tax Division, Consistency And Deterrence Are Key
Tax Notes, 09.10.2012

Niles A. Elber Quoted in Tax Notes, 1 Year Later, Frustrations Remain for OVDI Participants
Tax Notes, 09.10.2012

Scott Michel Quoted in Tax Notes, IRS Submits Treaty Request to Switzerland on Credit Suisse Data
Tax Notes, 08.13.2012

Scott Michel Quoted in Reuters, Update 1-US Treasury Tells How to Comply With Offshore Account Law
Reuters, 07.26.2012

H. David Rosenbloom Quoted in Reuters, Chipmaker Altera, U.S. IRS Fight in Cross-Border Tax Case
Reuters, 07.24.2012

Scott Michel Quoted in WSJ Regarding German Investigation of Credit Suisse Clients with Offshore Insurance Structures
The Wall Street Journal, 07.11.2012

Scott Michel Comments on New IRS Voluntary Disclosure Guidance
Tax Notes, 07.02.2012

Mark Matthews Interviewed on The Kudlow Report, IRS Assault
CNBC's The Kudlow Report, 06.29.2012

Scott Michel Comments on New Voluntary Disclosure Guidance From the IRS
Reuters, 06.29.2012

Scott Michel Quoted in Tax Notes, IRS Revising FAQ for Offshore Voluntary Disclosure Program
Tax Analysts, 06.25.2012

Scott Michel Quoted in Reuters, U.S. in Tax Crackdown Pact With Swiss, Japanese
Reuters, 06.21.2012

H. David Rosenbloom Discusses FATCA at NYU Law Conference
NYU School of Law News, 06.21.2012

Scott Michel Quoted on CNBC, Tax Shelters: Why Israel Could Be the Next Switzerland
CNBC, 06.19.2012

Chambers and Legal 500 Recognize Caplin & Drysdale in 2012 Top Rankings
Both | *Chambers USA / The Legal 500*, 06.12.2012

Patricia G. Lewis Quoted in Bloomberg BNA Daily Tax Report, OECD Working Group to Issue Draft On Standard Approach to Safe Harbors
Bloomberg BNA Daily Tax Report, 06.05.2012

Patricia Gimbel Lewis Wins "Best in Transfer Pricing" Award, Women in Business Law Awards for the Americas Awards & Rankings | *Euromoney Legal Media Group*, 05.25.2012

Mark Allison Quoted in The Wall Street Journal, IRS Loses Tax-Shelter Case
The Wall Street Journal, 04.25.2012

Mark Matthews Quoted in The Wall Street Journal, When Can Tax Cheats Relax?
Wall Street Journal, 04.13.2012

Scott Michel Quoted in The Wall Street Journal, IRS Suffers Setback in Identifying Secret Credit Suisse Accounts
The Wall Street Journal, 04.12.2012

Legal Bisnow Profiles Mark Matthews
Legal Bisnow, 04.12.2012

Scott Michel Quoted on Swissinfo.ch, No Let-Up in US Fight Against Tax Evasion
swissinfo.ch, 04.04.2012

Mark Allison Quoted in Tax Notes, Self-Serving Concessions And Penalty Avoidance
Tax Notes, 03.26.2012

Scott Michel Quoted in Forbes, The Biggest Story in Banking, Thanks to IRS
Forbes, 03.21.2012

Scott Michel Quoted in Wall Street Journal Article, Swiss Amend U.S. Tax Treaty
Wall Street Journal, 03.06.2012

Caplin & Drysdale Taps Mark Matthews to Bolster Tax Practices in Washington, D.C.
Press Release | 02.13.2012

Scott Michel Quoted in Reuters, U.S. Enlists 5 EU Nations in Offshore Tax Crackdown
Reuters, 02.08.2012

World Radio Switzerland Interviews Scott Michel, After Wegelin Bank's Indictment, Who's Next?
World Radio Switzerland, 02.06.2012

Scott Michel Quoted in Bloomberg BNA, Wegelin Indictment Signals New Battleground in U.S. Offshore Evasion Fight
Bloomberg BNA Daily Tax Report, 02.06.2012

Scott Michel Quoted in Swiss Radio and Swiss Info, U.S. Indicts the Oldest Swiss Private Bank
Swiss Radio, 02.03.2012

Mark Allison Quoted in Tax Notes, Federal Circuit Clarifies Third-Party Info Disclosure Exception
Tax Notes, 01.30.2012

Mark Allison Quoted in Tax Notes, Practitioners Examine Economic Substance in Tax Shelter Cases
Tax Notes, 01.23.2012

Scott Michel Comments on Voluntary Disclosure Penalty Issues
Toronto Star, 01.11.2012

Scott Michel Quoted in Reuters, Swiss Case Lifts Curtain on Correspondent Banking
Reuters, 01.06.2012

Scott D. Michel Comments in Tax Notes Today Article, IRS to Allow Extensions of August 31 OVDI Application Deadline

Tax Analysts-Tax Notes Today, 01.03.2012

The Washingtonian Lists Eight Caplin & Drysdale Attorneys as Top Lawyers in Washington Awards & Rankings | *Washingtonian Magazine*, 12.30.2011

David Rosenbloom Quoted in The New York Times, Law to Find Tax Evaders Denounced *The New York Times*, 12.26.2011

Scott Michel Quoted in Reuters, Taxpayers With Overseas Accounts Seethe at Penalties *Reuters*, 12.08.2011

Scott Michel Comments in Reuters, Credit Suisse Will Disclose Names of U.S. Clients *Reuters*, 11.08.2011

Scott Michel Comments in The Wall Street Journal, Credit Suisse to Name Names *The Wall Street Journal*, 11.08.2011

David Rosenbloom Quoted in Financial Post, Swiss Banks Near Deal to Disclose Customer Names to U.S. *Financial Post*, 10.24.2011

Bloomberg Law Interview: Scott Michel Says Financial Firms Are Struggling to Comply With FATCA *Bloomberg Law*, 09.29.2011

Scott Michel Quoted in Financial Post, IRS Strikes a Conciliatory Tone Toward Canadians *Financial Post*, 09.28.2011

Niles A. Elber Comments in Tax Notes Article, Clarification on Retirement Plans Needed in OVDI *Tax Notes*, 09.26.2011

Scott Michel Quoted in Reuters, U.S. Readies Papers V. Swiss Banks on Tax Evasion *Reuters*, 09.10.2011

Scott Michel Comments on the IRS Amnesty for Undeclared Offshore Account Holders *Bloomberg*, 09.07.2011

Scott Michel Quoted in Swissinfo, Banks Say U.S. Tax Deal Must Respect Swiss Law *swissinfo*, 09.05.2011

The Best Lawyers in America Ranks 19 Caplin & Drysdale Attorneys as Leaders in Their Field Awards & Rankings | *U.S. News & World Report*, 09.01.2011

Scott Michel Comments in CNBC and The Wall Street Journal About IRS Crackdown of Undeclared Offshore Accounts *CNBC, Wall Street Journal*, 08.19.2011

Scott Michel Quoted in Bloomberg, Credit Suisse Likely to Settle Criminal Tax Probe *Bloomberg*, 08.15.2011

Scott Michel Quoted in Tax Analysts, Practitioners Assess Offshore Initiative as Deadline Approaches *Tax Notes*, 08.15.2011

Mark Allison and Christopher Rizek Quoted in Tax Notes, Offshore Plan Participants May Have FBAR Obligations *Tax Notes*, 08.08.2011

Christopher Rizek Comments in The National Taxpayer Advocate, IRS In-House Critic Paid to Tell Tax Collecting Agency of Flaws

Bloomberg, Pittsburgh Tribune - Review, 08.07.2011

Tax Analysts Roundtable Panelist Christopher Rizek Discuss Tax Guidance Processes

Tax Notes, 08.01.2011

Scott Michel Quoted in Swissinfo, Credit Suisse "Worse Off" Than UBS in the U.S.

swissinfo.ch, 07.27.2011

Mark Allison Responds to Altria's Battle With the IRS

San Francisco Chronicle, 07.21.2011

Scott Michel Comments on Possible U.S. Indictment of Swiss Bank Credit Suisse on Tax Evasion Charges

Reuters, 07.15.2011

Scott Michel Comments in Reuters Article, "U.S. Senate Bill Targets Offshore Tax "Trickery"

Reuters, 07.12.2011

Mark Allison Responds to D.C. Circuit's Decision to Uphold Extended Limitations Period for Tax Returns Containing Overstated Basis Items

Tax Analysts, 06.22.2011

Caplin & Drysdale Taps Mark D. Allison to Bolster Tax Practices in New York

Press Release | 06.16.2011

Chambers and Legal 500 Recognize Caplin & Drysdale in 2011 Top Rankings

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

World Radio Switzerland Interviews Christopher Rizek on the Consequences of a Potential U.S.-Swiss Tax Evasion Deal

World Radio Switzerland, 06.14.2011

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

Bloomberg, 06.10.2011

Scott Michel Comments in Bloomberg, IRS Loosens Aug. 31 Deadline for Offshore Tax Disclosures

Bloomberg, 06.03.2011

Scott D. Michel Comments in Tax Notes Today Article, IRS to Allow Extensions of August 31 OVDI Application Deadline

Tax Analysts-Tax Notes Today, 06.03.2011

Wall Street Journal Interviews Scott Michel About IRS Enforcement in Asia

Wall Street Journal, 05.11.2011

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

CNBC, 04.15.2011

Americans Holding Money in Secret Offshore Accounts Risk Prosecution

NBC Universal, 04.15.2011

Niles Elber Comments on Overseas Banks Possibly Facing Penalties

The New York Times, 04.13.2011

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

Scott Michel Comments on U.S. Crackdown of Undeclared Offshore Accounts
Bloomberg, 03.11.2011

H. David Rosenbloom and Patricia G. Lewis Selected in The Best of the Best 2011
Awards & Rankings | *Expert Guides*, 03.01.2011

Scott Michel Comments on U.S. Indictments of Credit Suisse Employees
Swiss Info, 02.27.2011

Scott Michel Comments on IRS's Second Amnesty Program for Undeclared Offshore Account Holders
The Wall Street Journal, Bloomberg, The New York Times, Automated Trader, Tax Analysts, South China Morning Post, 02.23.2011

Caplin & Drysdale Attorneys Comment on WikiLeaks' Release of Offshore Account Data
The Wall Street Journal, World Radio Switzerland, The New York Times, Marketplace, 02.03.2011

WikiLeaks' Release of 2,000 Foreign Bank Accounts to Spell Tax Complications for Undeclared Account Holders
Press Release | 01.17.2011

David Rosenbloom Comments on U.S. Companies' Use of Repatriation Strategies to Avoid Taxes
Bloomberg, 12.29.2010

Scott Michel States Switzerland's Cantonal Banks Next Target of U.S. Tax Investigators
World Radio Switzerland, 12.28.2010

Scott Michel Comments on Potential New Amnesty Program From IRS
Bloomberg Businessweek, 12.09.2010

Scott Michel Comments on Israeli Bank's Response Amid IRS Scrutiny of Undeclared Offshore Accounts
Reuters, 11.01.2010

David Rosenbloom Comments on Undeclared Offshore Banking's Shift to the East
09.24.2010

Christopher Rizek Comments on IRS Providing Industry-Specific Guidance for Tax Problems
Nasdaq, 09.21.2010

Caplin & Drysdale Recognized in 2011-2012 U.S. News-Best Law Firms Ranking
U.S. News & World Report, 09.15.2010

Scott Michel Comments on IRS Scrutiny of Tax Attorneys
Financial Adviser, 08.31.2010

Scott Michel Comments on U.S. Government's Investigation of Offshore Accounts
Tax Analysts, Eurasia Review, The Wall Street Journal, 08.24.2010

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

19 Caplin & Drysdale Attorneys Named Best Lawyers in America
Awards & Rankings | *U.S. News & World Report*, 08.04.2010

Scott Michel Comments on Swiss Approval of UBS Settlement With the U.S.
Bloomberg, Schweizer Fernsehen, 06.17.2010

Chambers USA and Legal 500 Recognize Caplin & Drysdale in 2010 Top Rankings
Both | *Chambers USA / The Legal 500*, 06.15.2010

Scott Michel Comments on Swiss-U.S. Deal on UBS
Forexyard, The New York Times, 06.09.2010

Christopher Rizek Comments on Circular 230 Revisions
BNA, 06.09.2010

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

David Rosenbloom Comments on International Tax Policy
Insurance News, 05.11.2010

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

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

Caplin & Drysdale Shortlisted for the Chambers USA Awards for Excellence 2010
Awards & Rankings | *Chambers USA*, 03.17.2010

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

IRS Unveils Criteria for Swiss Bank Account Disclosures
The Washington Post, 11.17.2009

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

GETTING PERSONAL: Unit Should Help IRS Track Rich Tax Dodgers
The Wall Street Journal, 11.03.2009

Washingtonian Magazine Lists Six Caplin & Drysdale Attorneys as Top Lawyers in Washington
Awards & Rankings | *Washingtonian Magazine*, 11.01.2009

Scott Michel Comments on the IRS Settlement Initiative and Implications after Amnesty Deadline
The New York Times, ABC News, The Wall Street Journal, Bloomberg, 10.28.2009

Radio Interview: Many Swiss Account Holders 'Petrified' Over U.S. Tax Probe
World Radio Switzerland, 10.16.2009

Scott Michel Comments on IRS Crackdown of Undisclosed Offshore Accounts With UBS, Credit Suisse, Julius
Baer, LGT
The Washington Post, Dow Jones, NPR, Bloomberg, CNBC, etc., 09.22.2009

Radio Interview: Watch Out Swiss Banks Says Washington Lawyer Dealing With Tax Disclosures
09.22.2009

Swiss TV Interviews David Rosenbloom on IRS Crackdown of American Taxpayers With Undeclared Offshore Accounts (French)

Le TSR, 09.22.2009

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

Reuters, 09.18.2009

Something to Aim for

Dealbreaker, 09.08.2009

Swiss Deal With IRS May Hide Some Tax Cheats

The New York Times, 09.07.2009

New OPR Chief Ready to Get Tough

WebCPA, 09.01.2009

Informant in Tiny Nation Toppled Decades of Banking Secrecy

Sunlight Projects, 08.31.2009

International Tax Review Nominates Caplin & Drysdale for Transfer Pricing Firm of the Year Award

Awards & Rankings | *International Tax Review*, 08.18.2009

Talent in Demand as Transfer Pricing Disputes Gain Attention

A.E. Feldman Blog, 06.29.2009

U.S. Justice Dept Says No Plans to Drop UBS Case

guardian.co.uk, 06.23.2009

U.S. and Switzerland Agree to New Tax Treaty

Swiss Info, 06.19.2009

Chambers USA 2009 Recognizes Eight Caplin & Drysdale Attorneys as 'America's Leading Lawyers'

Awards & Rankings | *Chambers USA*, 06.15.2009

Chip Maker Xilinx Loses Tax Ruling

Wall Street Journal, 05.29.2009

Super Lawyers Recognizes Nine Caplin & Drysdale Attorneys in Five Practice Areas

Awards & Rankings | *Super Lawyers*, 03.27.2009

IRS Seduces Offshore Account Holders

Press Release | 03.26.2009

Countries in Europe and Asia Agree to Modify Treaty Provisions: Profound Implications for Noncompliant U.S. Taxpayers With Foreign Accounts

Press Release | 03.13.2009

Caplin & Drysdale Member Cono Namorato Interviewed on Money Matters

Money Matters, 03.13.2009

PLC's Which Lawyer? Recommended Caplin & Drysdale as Leading in Tax

Awards & Rankings | *Practical Law*, 03.02.2009

H. David Rosenbloom and Patricia G. Lewis Selected in The Best of the Best 2009

Awards & Rankings | *Expert Guides*, 03.01.2009

IRS Wants to Force Swiss Bank UBS to Lift Veil of Secrecy
Miami Herald, 02.20.2009

UBS Faces IRS Fight Over Names
International Herald Tribune, 02.19.2009

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

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

Corporate Crime Defense Bar in Unison: More Prosecutions Are on the Way
Corporate Crime Reporter, 02.19.2009

UBS Faces IRS Fight Over Names, Shrs Rise on Deal
Interactive Investor, 02.19.2009

Niles Elber Named One of American Bar Association's 2009 Outstanding Young Tax Lawyers Awards & Rankings | *American Bar Association*, 01.09.2009

Caplin & Drysdale's Niles Elber Named One of American Bar Association's 2009 Outstanding Young Tax Lawyers Awards & Rankings | 01.09.2009

Is Big Business Scared of Obama?
The Wall Street Journal Law Blog, 01.02.2009

Four Caplin & Drysdale Attorneys Recognized as Top Tax Practitioners in the World Awards & Rankings | *Expert Guides*, 12.01.2008

Caplin & Drysdale Ranked #39 Out of the Top 100 Global Tax Law Firms Awards & Rankings | 11.03.2008

EVENTS

Niles Elber Explores Civil Enforcement Priorities at ABA Institute on Criminal Tax Fraud and Tax Controversy Las Vegas, NV, 12.08.2023

Scott Michel Addresses Ethics in Tax Practice at Biennial Parker C. Fielder Oil, Gas, and Energy Tax Conference Houston, TX, 11.17.2023

Christopher Rizek Discusses Ethics and Modern Technology at ABA Annual Philadelphia Tax Conference Philadelphia, PA, 11.15.2023

Niles Elber Addresses Recent Civil & Criminal Tax Updates at NYU 82nd Institute on Federal Taxation New York, NY, 10.22.2023

Eleanor VanderMeulen Moderates Panel on Ethical Issues at ABA Fall Tax Meeting Virtual, 10.20.2023

Charles Ruchelman and Jonathan Black Discuss Captive Insurance Disclosure Regulations at DCIA Fall Forum Wilmington, DE, 10.18.2023

Victor Jaramillo Addresses Digital Assets and Taxes at Latino Tax Fest Las Vegas, NV, 07.12.2023

Victor Jaramillo Addresses in Spanish Digital Assets and Taxes at Latino Tax Fest
Las Vegas, NV, 07.11.2023

Victor Jaramillo Co-Chairs Panel on Tax Issues with Computer Software at ABA U.S. and Latin America Tax
Practice Trends Conference
Miami, FL, 06.16.2023

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

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

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
Tampa, Florida, 02.02.2023

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

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

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

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

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

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

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

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

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

Harvard Law School (online only), 05.19.2022

Christopher Rizek Addresses Ethical Issues at ABA May Tax Meeting

Hybrid, Marriott Marquis Washington, DC, 05.13.2022

Christopher Rizek Analyzes Ethical Considerations in Tax Collection Representation at ABA May Tax Meeting

Hybrid, Marriott Marquis Washington, DC, 05.13.2022

Niles Elber Analyze IRS Examinations on Lorman Webinar

03.31.2022

Niles Elber Address Tax Return Preparers Being Under New Scrutiny on Strafford Webinar

1:00 PM EST

02.10.2022

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

9:45 AM - 10:35 AM

12.10.2021

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

10:30 AM - 11:30 AM

12.09.2021

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

11:30 AM - 12:30 PM

12.09.2021

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

11:00 AM to 12:20 PM

12.09.2021

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

12.01.2021

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

10:00 AM EST

11.24.2021

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

11.17.2021

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

11:40 AM - 12:30 PM

11.16.2021

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

2:15 PM

11.09.2021

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

11:15 AM

11.09.2021

Victor Jaramillo Addresses IRS Cryptocurrency Enforcement at Latino Tax Fest

10:00 AM to 10:50 AM PST

09.29.2021

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

12:00 PM to 12:50 PM PST

09.29.2021

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

2:00 PM

09.22.2021

Benjamin Eisenstat Moderates Panel on Privacy at ABA Fall Tax Meeting

3:00 PM

09.21.2021

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

09.09.2021

Patricia Lewis Joins ABA Women in Tax Forum Zoom Tea

4:30 PM ET

07.16.2021

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

06.25.2021

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

3:00 PM to 4:00 PM

06.24.2021

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

1:00 PM - 2:15 PM

06.21.2021

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

05.25.2021

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

2:30 PM ET

05.11.2021

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

2:30 PM ET

05.11.2021

Robert Carney Explores Taxing Wealth on Federalist Society Webinar

1:30 PM ET

04.16.2021

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

11:00 AM – 12:30 PM ET

03.25.2021

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

2:30 PM to 3:30 PM

03.03.2021

Christopher Rizek Explores Ethical Obligations at ABA Midyear Tax Meeting

1:10 PM to 2:00 PM

01.29.2021

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

12:30 PM to 2:00 PM

01.27.2021

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

2:40 PM

12.09.2020

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

11:00 AM - 1:30 PM

12.04.2020

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

11.16.2020

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

3:30 PM

11.12.2020

Victor Jaramillo Addresses Reporting Foreign Accounts at Latino Tax Fest

2:30 PM to 3:20 PM

10.28.2020

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

12:30 PM to 1:30 PM

10.28.2020

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

09.23.2020

Victor Jaramillo Addresses in Spanish International Tax Preparation on LatinoTaxPro Webinar

11:30 PM PT

08.06.2020

Victor Jaramillo Explores International Tax Preparation on LatinoTaxPro Webinar

11:30 PM PT

08.04.2020

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

1:15 PM

07.21.2020

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

1:00 PM - 1:20 PM

07.14.2020

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

4:30 PM - 5:30 PM

03.05.2020

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

02.26.2020

Victor Jaramillo Discusses Developments in Offshore Compliance and Enforcement at ABA 2020 Midyear Meeting

8:45 AM

02.01.2020

Victor Jaramillo Explores Cryptocurrency Issues at ABA 2020 Midyear Meeting

11:00 AM

02.01.2020

Mark Allison Moderates Panel on Foreign Tax Judgments at ABA 2020 Midyear Meeting

3:20 PM

01.31.2020

Christopher Rizek Discusses Ethics at 32nd Annual Institute on Current Issues in International Taxation

10:45 AM - 11:45 AM

12.20.2019

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

4:15 PM - 5:00 PM

12.19.2019

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

12:50 PM - 2:00 PM

12.05.2019

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

10:15 AM

11.22.2019

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

3:30 PM

11.15.2019

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

1:15 PM

11.10.2019

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

11.07.2019

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

5:15 PM

10.24.2019

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

1:15 PM

10.20.2019

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

8:45 AM - 12:00 PM

10.05.2019

Mark Matthews Addresses Tax Collection at International Visitor Leadership Program

09.19.2019

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

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

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

11:45 AM - 12:45 PM

03.08.2019

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

2:30 PM to 3:30 PM

03.08.2019

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

Elizabeth Stevens Discusses Alternatives to Resolving Large, Complicated, Corporate Tax Disputes at Women In Tax Forum
11:05 AM ET
02.26.2019

Clark Armitage Discusses Practical APA Experiences at TP Minds Americas
2:00 PM ET - 2:40 PM ET
02.26.2019

Clark Armitage Leads International Tax Workshop at TP Minds Americas
02.25.2019

Kirsten Burmester Explores Importance of Tax Treaties at IFA USA Annual Conference
9:45 AM to 10:45 AM ET
02.22.2019

Niles Elber Chairs Civil and Criminal Tax Penalties Committee Meeting at ABA 2019 Midyear Meeting
8:30 AM - 11:45 AM CT
01.19.2019

Christopher Rizek Discusses Contingency Fees at ABA 2019 Midyear Meeting
9:15 AM CT
01.18.2019

Scott Michel Moderates Panel on Two-Minute Drills at ABA 2019 Midyear Meeting
2:00 PM CT
01.18.2019

Christopher Rizek Discusses Ethics at 31st Annual Institute on Current Issues in International Taxation
10:45 AM - 11:45 AM
12.14.2018

Kirsten Burmester Analyzes Cross-Border Matters at 31st Annual Institute on Current Issues in International Taxation
4:45 PM - 5:45 PM
12.13.2018

Kirsten Burmester Moderates Panel on Transfer Pricing Disputes at International Tax Summit
2:20 PM
11.29.2018

Clark Armitage Explores Tax Planning Strategies for Multinational Companies at Bloomberg Tax Leadership Forum
3:10 PM ET
11.29.2018

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

2:45 PM

11.12.2018

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

1:15 PM

11.11.2018

Christopher Rizek Examines Keeping Your Communications Confidential at Insurance Tax Conference

11.09.2018

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

1:30 PM

11.01.2018

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

5:15 PM to 6:55 PM

10.25.2018

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

10.25.2018

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

1:15 PM

10.21.2018

Clark Armitage Discusses Dispute Resolution at IICJ New York Conference

11:15 AM

10.16.2018

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

10.10.2018

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

8:30 AM - 11:45 AM

10.06.2018

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

11:00 AM

10.06.2018

Victor Jaramillo Examines Global Trends in Transparency and Disclosure at ABA 2018 Fall Meeting

3:00 PM

10.05.2018

Victor Jaramillo Explores Inbound Financing After Tax Reform at ABA 2018 Fall Meeting

9:30 AM

10.04.2018

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

09.17.2018

Clark Armitage Moderates Panel on Cross-Border Business at AICPA & CIMA U.S. Tax Reform Conference

11:15 AM

09.17.2018

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

09.17.2018

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

Congress

09.05.2018

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

09.05.2018

Kirsten Burmester Discusses Nonresident Tax Compliance on Strafford Webinar

1:00 PM - 2:30 PM EDT

08.07.2018

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

07.19.2018

Kirsten Burmester Discusses Tax Cuts and Jobs Act at 8th Annual NABE Transfer Pricing Symposium

10:30 AM to 12:00 PM

07.18.2018

Victor Jaramillo Addresses International Tax Planning Incentives at 8th Annual NABE Transfer Pricing Symposium

8:30 AM to 10:00 AM

07.18.2018

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

11:00 AM

06.22.2018

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

2:40 PM - 3:40 PM

06.21.2018

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

11:00 AM - 12:30 PM

06.09.2018

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

11:50 AM

06.01.2018

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

12:00 PM to 2:00 PM

05.30.2018

Clark Armitage Discusses 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

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

02.13.2018

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

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

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

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

12.07.2017

Scott Michel Discusses AML and Tax at Financial Crimes Enforcement Conference

4:00 PM - 5:15 PM

12.04.2017

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

2:45 PM to 3:45 PM

12.01.2017

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

10:30 AM to 11:45 AM

12.01.2017

Kirsten Burmester Discusses Avoiding Foreign Trust Throwback Tax at Strafford Webinar

1:00 PM ET to 2:00 PM ET

11.28.2017

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

9:00 AM

11.17.2017

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

3:25 PM

11.10.2017

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

3:00 PM - 4:15 PM

11.07.2017

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

11.03.2017

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

11.02.2017

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

11:15 AM - 12:15 PM

10.27.2017

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

10.27.2017

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

5:15 PM to 6:55 PM

10.26.2017

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

3:30 PM to 4:30 PM

10.25.2017

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

1:15 PM

10.22.2017

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

3:00 PM to 4:30 PM

10.19.2017

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

12:15 PM to 1:45 PM

10.11.2017

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

1:00 PM ET to 2:00 PM ET

09.28.2017

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

1:00 PM

09.19.2017

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

10:00 AM

09.16.2017

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

8:30 AM - 11:45 AM

09.16.2017

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

1:30 PM

09.15.2017

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

3:30 PM

09.15.2017

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

11:30 AM

09.15.2017

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

08.28.2017

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

08.24.2017

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

08.24.2017

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

08.10.2017

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

08.09.2017

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

8:30 AM to 10:00 AM

07.19.2017

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

1:45 PM to 3:15 PM

07.19.2017

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

Transfer Pricing– Inbound and Outbound

07.19.2017

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

1:15 PM - 2:15 PM

07.18.2017

Charles Ruchelman to Speak at Kentucky Captive Association Conference

8:10 AM - 9:00 AM

06.16.2017

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

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

8:30 AM

01.20.2017

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

2:30 PM

01.20.2017

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

4:00 PM - 5:00 PM

01.19.2017

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

4:00 PM

01.19.2017

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

4:00 PM

01.19.2017

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

8:00 AM - 9:00 AM

12.16.2016

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

5:00 PM - 6:00 PM

12.15.2016

Niles Elber to Speak on Offshore Enforcement at ABA Criminal Tax Fraud and Tax Controversy Conference

3:35 PM – 4:25 PM

12.08.2016

Christopher Rizek and Charles Ruchelman to Speak on Captive Insurance at Delaware Captive Insurance Association Webinar

12:15 PM to 2:00PM

12.01.2016

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

11.30.2016

David Rosenbloom to Speak on State Aid Controversy at International Tax Institute Seminar

12:15 PM to 2:00 PM

11.17.2016

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

11.15.2016

David Rosenbloom to Speak on International Tax at KPMG Event

12:30 PM - 1:25 PM

11.15.2016

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

11.13.2016

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

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

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

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

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

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

Mark Allison to Speak on Hot Audit/Controversy Issues 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

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

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

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

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

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

07.20.2016

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

1:00 PM

07.20.2016

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

07.19.2016

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

06.24.2016

Charles Ruchelman to Speak on Repeal of TEFRA, New Partnership Tax Examination, and Collection Statute at D.C. Bar Panel

from 12:00 pm to 2:00 pm

06.23.2016

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

06.03.2016

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

1:00 pm - 2:30 pm ET

05.16.2016

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

05.09.2016

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

9:05 AM

05.07.2016

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

10:45 AM

05.07.2016

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

05.07.2016

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

4:40 pm

05.06.2016

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

3:45 pm - 4:30pm

05.06.2016

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

05.06.2016

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

05.05.2016

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

04.29.2016

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

04.28.2016

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

11:00 am - 12:30 pm ET.

04.21.2016

David Rosenbloom to Speak at 2016 NYU/KPMG Tax Lecture

04.19.2016

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

03.30.2016

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

03.29.2016

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

03.17.2016

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

03.14.2016

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

03.04.2016

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

03.04.2016

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

03.02.2016

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

02.23.2016

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

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

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

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

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

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

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

Niles Elber 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

Scott Michel to Speak on Fixing Common Tax Problems
10.08.2015

Christopher Rizek to Chair Tax Controversy CLE
10.08.2015

Mark Allison to Speak on Examinations of TEFRA Partnership
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

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

Scott Michel to Co-Chair 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

Clark Armitage to Speak at Annual Institute on International Taxation
12.11.2014

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

Christopher Rizek to Speak on Tax Professionals and Malpractice
12.04.2014

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

Christopher Rizek to Speak on Ethical Issues for Tax Practitioners
11.20.2014

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

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

David Rosenbloom to Speak 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 Government Use of Data
11.06.2014

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

Mark Matthews to Speak on Key International Data Collection Programs
11.06.2014

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

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

Mark Allison to Speak at the TEI in Nashville
10.22.2014

Mark Matthews to Speak on Recent Developments in Compliance Initiatives
10.21.2014

Mark Allison to Speak on Tax Controversy and Litigation Updates
10.19.2014

Christopher Rizek to Speak on Tax Court Procedures
10.17.2014

Mark Allison to Speak on Tax Court Procedures Panel
10.17.2014

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

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

Mark Matthews to Speak on DOJ Procedures
09.20.2014

Niles Elber to Moderate 2014 OVDP and Streamlined Procedures Panel
09.20.2014

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

Patricia Lewis to Moderate Transfer Pricing Panel
09.19.2014

Mark Allison to Chair Court Procedure and Practice Discussion
09.19.2014

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

David Rosenbloom to Speak on International Taxation
08.22.2014

David Rosenbloom to Speak at First International Tax Forum
08.22.2014

David Rosenbloom to Speak on Cross-Border Taxation
08.21.2014

Niles Elber to Speak on Criminal Sentencing Webinar Panel
07.30.2014

Patricia Lewis to Discuss Transfer Pricing Risks at National Conference
07.23.2014

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



Scott Michel to Speak on Offshore Tax Compliance
07.10.2014

Mark Matthews to Speak at Annual Income Tax Seminar
06.26.2014

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

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

Mark Matthews to Speak on Global Private Wealth Industry
06.18.2014

Mark Matthews to Speak on Information Exchange and Privacy
06.18.2014

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

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 Chair Court Procedure & Practice Committee
05.09.2014

Mark Allison to Chair Roundtable Discussion at ABA May Meeting
05.09.2014

Mark Allison to Moderate Roundtable Discussion at ABA May Meeting
05.09.2014

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

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

Clark Armitage to Moderate Panel at Transfer Pricing Symposium
03.27.2014

Clark Armitage to Discuss APMA Program at International Conference
03.27.2014

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

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 Serve as Guest Speaker for IFA/CTF Conference
02.05.2014

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

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

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

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

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

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

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

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

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

Stafford Smiley to Speak at Moscow State Law Academy
10.25.2013

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

Mark Matthews to Speak on Corporate Compliance
10.24.2013

Stafford Smiley Speaks On Tax Reform at the Russian IFA
10.23.2013

Mark Matthews Presents Tax Program at Southern Federal Tax Institute
10.23.2013

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

Mark Allison Chairs TEFRA Panel at ABA Meeting
10.18.2013

Mark Allison Discusses International Tax Best Practices
10.18.2013

Mark Allison Discusses Tax Shelter Cases
10.18.2013

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

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

Scott Michel to Speak on Developments in Offshore Tax Compliance
10.11.2013

Scott Michel to Speak at Annual Advanced ALI CLE Course
10.11.2013

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

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

Mark Matthews to Speak at Atlanta Tax Forum
09.23.2013

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

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

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

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

Scott Michel to Speak at FATCA Seminar in Kuwait City
06.17.2013

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

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

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

H. David Rosenbloom Presents Lecture Series in Italy
05.06.2013

Clark Armitage Discusses Transfer Pricing Developments
05.01.2013

Charles Ruchelman to Present at COFC Program
04.23.2013

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

Mark Matthews to Speak on Criminal Tax Enforcement Hot Topics
03.20.2013

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

H. David Rosenbloom to Speak at the 2013 International Taxation 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

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

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

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

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

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

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

Mark Matthews to Speak at OffshoreAlert Conference on FATCA
11.26.2012

Christopher Rizek to Speak at NYU Institute on Federal
11.15.2012

Scott Michel to Speak at NYU Institute on Federal
11.11.2012

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

Scott Michel to Speak at Tulane Tax Institute
10.31.2012

H. David Rosenbloom to Speak at Mumbai Law Firm
10.30.2012

H. David Rosenbloom to Speak at NYU-ACTL 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 on Panel at UCLA Tax Controversy Institute
UCLA Tax Controversy Institute
10.25.2011

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

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

Christopher Rizek to Speak on Evidentiary Issues
10.21.2011

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

FBAR for the Fiduciary
10.18.2011

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

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

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

Scott Michel to Speak on Offshore Tax Enforcement
08.19.2011

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

Clark Armitage to Speak on APA Issues
08.01.2011

Taxes and the Guidance Problem
07.22.2011

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

Christopher Rizek to Chair Court Procedure & Practice Committee
05.06.2011



Charles Ruchelman to Moderate Panel on Evidentiary Issues
05.06.2011

Circular 230 Important Revisions
02.23.2011

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

Christopher Rizek to Chair Court Procedure and Practice Roundtable
01.21.2011

Mark Allison to Speak on Section 6700 Litigation
01.21.2011

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 Speak on Ethical Issues in International Tax Practice
12.10.2010

David Rosenbloom to Speak on Competent Authority Panel
12.09.2010

The 27th Annual National Institute on Criminal Fraud
12.02.2010

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

David Rosenbloom to Speak on The UBS Saga
11.18.2010

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

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

Niles Elber to Speak on Civil and Criminal Tax Penalties
09.25.2010

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

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

Christopher Rizek to Chair Roundtable Discussion
09.24.2010

Scott Michel to Chair Standards of Tax Practice Panel Discussions
09.24.2010

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

Scott Michel to Speak on Offshore Tax Compliance
08.20.2010

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

The Foreign Account Tax Compliance Act in 2010 Explored
08.05.2010

Straight from the Bench: How to Prepare Your Case for Tax Court
New York University Tax Controversy Forum
06.18.2010

Ethical Issues for Tax Practitioners
Virginia Conference on Federal Taxation
06.03.2010

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 Chair Tax Committee for 2010 ABA Midyear Meeting
01.22.2010

Christopher Rizek to Chair Panel for 2010 ABA Midyear Meeting
01.22.2010

Charles Ruchelman to Speak on the Stipulation Process
01.22.2010

Scott Michel to Speak on Ethical Issues in Whistleblower Claims
01.22.2010

Scott Michel to Speak on Issues in Whistleblower Claims
01.22.2010

Cono Namorato to Speak on Issues Surrounding the FBAR
01.14.2010

Mark Allison Discusses Tax Court Procedures at ABA Conference
01.11.2010

Scott Michel and Cono Namorato to Speak at The 26th Annual National Institute on Criminal Tax Fraud
12.03.2009

Litigating for the IRS: How It's Done and Where It Leads
U.S. Tax Court CLE, Washington, D.C.
11.20.2009

Brave New World of Tax Enforcement: UBS, International and Corporate Criminal Tax Issues
White Collar Practice Seminar - Pennsylvania Association of Criminal Defense Lawyers
11.13.2009

Clark Armitage Covers Competent Authority at Canadian Conference
11.01.2009

68th Institute of Federal Taxation
New York University
10.18.2009

FOIA - It Doesn't Hurt (And May Help) To Ask
2009 Joint Fall CLE Meeting - ABA Section of Taxation and Section of Real Property, Trust and Estate Law, Estate
Division
09.24.2009

Mark Allison Chairs Statute of Limitations Panel
09.10.2009

Daniel Rosenbaum to Present Audio Conference on Federal Employment Tax Oversight
08.13.2009

Undeclared Foreign Accounts, Trusts and Estates: Implications of IRS Enforcement Actions
07.16.2009

Clark Armitage Discusses APA and Competent at Training Program
07.01.2009

Mark Allison Chairs Transferee Liability Panel at ABA Conference
01.10.2009

Mark Allison Discusses Jury Trials at ABA Event
09.10.2008

Mark Allison Talks Cross-Border Discovery at ABA Program
09.10.2007

Codification of Economic Substance: Its Potential Impact on Audits and Litigation
District of Columbia Bar Taxation Section - Tax Audits and Litigation Committee
DC Bar Conference; Washington, D.C., 05.17.2007

The Top Ten Things That Get Tax Lawyers into Trouble for Malpractice
ABA Tax Section, TaxLink Live
Teleconference, 04.11.2007

Best Practices
National Association of Bond Lawyers
Teleconference, 02.07.2007

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

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

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

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

Mark Allison Discusses Tax Shelter Litigation Trends at ABA Program
02.10.2006

Mark Allison Speaks on Expert Witnesses at ABA Conference
09.10.2004

PUBLICATIONS

The Employee Retention Credit: New IRS Initiatives Raise Legal Considerations for Employers
Employee Benefits and Tax Disputes & Tax Litigation Alert | 11.08.2023

The Supreme Court Will Review the Constitutionality of Section 965 in *Moore v. United States*; Should Taxpayers
Who Paid the Tax Seek a Refund?
Tax Alert | 07.24.2023

There's Still Time, But It's of the Essence
Structuring into an Exemption from the New Beneficial Ownership Information Reporting Requirements
Business, Investment & Transactional Tax Alert | 07.18.2023

Further Criticism of the Procedure in *Liberty Global
Tax Notes Federal Letter to the Editor*, 07.17.2023

In the Room Where it Happens, it Doesn't Always Happen Exactly Right
Procedurally Taxing, 05.08.2023

Statute of Limitations Considerations Under the BBA
Article | *Tax Notes Federal*, 04.17.2023

Tax Court Rules that IRS Lacks Statutory Authority to Assess Penalties for Failure to File Form 5471
Tax Alert | 04.06.2023

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

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

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

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

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

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

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

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

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

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

What's the IRS Criminal Investigation Division Telling Us About Its Priorities and Update on the Erosion of the Attorney-Client Privilege in Tax Cases

Article | *ABA White Collar Crime Committee Newsletter*, 03.07.2022

The Enduring Value of Departures in a Post-Booker World

Article | *ABA White Collar Crime Committee Newsletter*, 03.07.2022

Taxpayer Defeats IRS Penalty in Tax Court for Conservation Easement Transaction

Tax Alert | 12.21.2021

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

International Tax Alert | 08.17.2021

Yellen's Global Minimum Tax Push Likely to Crash and Burn

Article | *Roll Call Op-Ed*, 07.23.2021

IRS to Taxpayers: Do You Trust Me?

Article | *The Tax Advisor*, 07.21.2021

Justices' Nod To Preemptive Tax Challenges May Caution IRS

Article | *Law360*, 05.26.2021

Using Protected And Incorporated Cells To Provide Captive Insurance: Benefits And Considerations

Article | *IFC*, 05.12.2021

Is an Act 60 Taxpayer Required to Have a Transfer Pricing Study?

International Tax Alert | 04.28.2021

IRS to "Campaign" into Puerto Rico; How can Taxpayers Defend?

Tax Alert | 02.03.2021

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

Tax Alert | 01.26.2021

INSIGHT: The 2020 Revision to the Internal Revenue Manual's Voluntary Disclosure Practice: More Consistency with Greater Risk

Article | *Bloomberg Tax: Daily Tax Report*, 01.12.2021

Are The IRS's New Terms Worth It

Article | *Captive Review*, 12.22.2020

U.S. Tax Enforcement – A New Decade Begins

IFC, 11.05.2020

IRS Kicks Off Post-*Altera* Audit Adjustments

Tax Alert | 09.21.2020

The IRS Resumes its Global High-Wealth Examination Program and Targets High Income Non-Filers

Tax Alert | 07.22.2020

Challenge to the Constitutionality of the ACA Raises NII Tax Refund Possibility

Tax Alert | 07.06.2020

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

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

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

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

Partnership Filing Relief
Tax Alert | 04.13.2020

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

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

Abatement of Foreign Pension Trust Penalties
Tax Alert | 03.31.2020

Captive Soft Letter
Tax Alert | 03.31.2020

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

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

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

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

New Cryptocurrency Guidance
Tax Alert | 10.22.2019

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

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

COMMENTARY & ANALYSIS: The TCJA and the Treaties
Article | *Tax Notes International Magazine*, 09.09.2019

Decrypting The New IRS Cryptocurrency Compliance Letters
Article | *Law360 Tax Authority*, 08.07.2019

Cryptocurrency Criminal Tax Cases Coming Soon

Tax Alert | 07.23.2019

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

Article | *ABA Tax Times*, 06.14.2019

Deductibility of Illegal Payments, Fines, and Penalties

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

Tax Problems Loom in the College Admissions Scandal

Tax Alert | 03.18.2019

EXPERT ANALYSIS: Planning For Partnership Representatives In The New Year

Article | *Law360*, 01.04.2019

The New Voluntary Disclosure Practice: A Fair Compromise?

Tax Alert | 12.03.2018

Year-End Updates on Partnership Representatives

Tax Alert | 11.06.2018

Navigating QBAIL Quirks of the GILTI Regulations

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

COMMENTARY & ANALYSIS: The BEAT and the Treaties

Article | *Tax Notes International Magazine*, 10.15.2018

Kumquat: The U.S. International Tax Issues

Article | *Tax Notes International Magazine*, 06.25.2018

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

Article | *Law360*, 06.21.2018

IRS Adds Foreign Trust Information Reporting to Compliance Campaign Program

Tax Alert | 06.01.2018

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

Virginia Law Review, 05.01.2018

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

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

INSIGHT: BEAT Strikes the Wrong Note

Article | *Bloomberg Tax: Daily Tax Report*, 03.16.2018

IRS's Offshore Voluntary Disclosure Program Ending: Impact on U.S. Taxpayers

Tax Alert | 03.14.2018

GILTI Pleasures

Article | *Tax Notes International Magazine*, 02.12.2018

IRS to Revoke Passports for Seriously Delinquent Tax Debts Starting February 2018

Tax Alert | 02.12.2018

United Nations Handbook on Selected Issues in Protecting the Tax Base of Developing Countries - Chapter IV:

Limiting Interest Deductions

Article | *United Nations*, 01.22.2018

U.S. Plays Lone Ranger on International Tax to Its Detriment

Article | *The Hill Op-Ed*, 01.19.2018

New Partnership Audit Rules Go Live

Tax Alert | 01.09.2018

International Aspects of U.S. 'Tax Reform' -- Is This Really Where We Want to Go?

Article | *International Tax Report*, 01.02.2018

Tax Reform May Make Payment of Nonbusiness Tax Advice Fees Non-Deductible

Tax Alert | 12.12.2017

David Rosenbloom Comments on Tax Bills' Impact on Earnings of U.S.-Owned Foreign Corporations

Article | *The Washington Post Op-Ed*, 12.03.2017

Possible Tax Fallout for Student and Professional Athletes from NCAA-Related Investigations

Tax Alert | 11.09.2017

Paradise Papers: U.S. Citizens and Residents Required to Report on Offshore Assets

Tax Alert | 11.06.2017

Low-Tax Texas Should Pay Its Fair Share of Harvey Costs

Article | *The Washington Post Op-Ed*, 09.06.2017

Different Viewpoint Not a Misrepresentation: Tax Court Holds IRS Abused Its Discretion in Cancelling Eaton's APAs

International Tax Alert | 08.24.2017

Foreword for Asian Voices: BEPS and Beyond

Article | *International Bureau of Fiscal Documentation (IBFD)*, 07.01.2017

U.S. Corporate Tax Reform and Wallace Stevens

Article | *Tax Notes*, 05.30.2017

The Destination-Based Cash Flow Tax Is a VAT?

Article | *Tax Notes*, 03.29.2017

Transfer Pricing Forum

Bloomberg BNA, 03.17.2017

Captive Insurance: State Reporting Obligations for Transactions of Interest

Article | *International Law Office*, 03.03.2017

U.S. Corporate Tax Reform and Jean-Paul Sartre

Article | *Tax Notes*, 03.01.2017

IRS Launches Issue-Based Corporate Compliance Campaigns

Article | *International Law Office*, 02.24.2017

Will Border Adjustment Tax End Transfer Pricing as We Know It?

Bloomberg BNA, Tax Management Transfer Pricing Report, 02.23.2017

Where Have All the Transfer Pricing Safe Harbors Gone? A Plea for Reinvigoration
Bloomberg BNA, Tax Management Transfer Pricing Report, 02.23.2017

IRS Launches Issue Based Corporate Compliance Campaigns
Article | *Global Tax Weekly*, 02.16.2017

Captive Insurance Industry Should Be Aware of State Reporting Obligations for Transactions of Interest
Tax Alert | 02.10.2017

Reconsidering European Court of Justice Jurisprudence on Limitation on Benefits Clauses: Why the U.S. Should Care
Article | *46 TM Int'l J. 83, Bloomberg BNA Tax Management International Journal*, 02.10.2017

IRS Launches 13 Issue-Based Corporate Compliance Campaigns
Tax Alert | 02.03.2017

Syndicated Conservation Easement Transactions Identified as New 'Listed Transactions'
Article | *International Law Office*, 01.27.2017

The U.S. Must Avoid This Untested Approach To International Taxes
The Hill Op-Ed, 01.24.2017

Treasury Issues Regulations Addressing Use of LLCs to Disguise Beneficial Ownership
Article | *International Law Office*, 01.20.2017

Tax Claims - Court of Federal Claims: Jurisdiction, Practice, and Procedure
Article | *Court of Federal Claims: Jurisdiction, Practice, and Procedure*, 01.09.2017

Congress Looks to Fix New Partnership Audit Rules
Article | *International Law Office*, 01.06.2017

Tax Plans Compared (December 2016) Corporate Tax
Article | *Global Tax Weekly*, 01.05.2017

Syndicated Conservation Easement Transactions Identified as New "Listed Transactions"
Tax Alert | 01.03.2017

Treasury Issues Final Regulations to Address Use of U.S. LLCs to Disguise Beneficial Ownership
International Tax Alert | 12.19.2016

Voluntary Disclosure Window Closing for Bitcoin
Article | *International Law Office*, 12.16.2016

Congress Looks to Fix New Partnership Audit Rules
Tax Alert | 12.14.2016

Voluntary Disclosure Window Closing on Bitcoin Users
Tax Alert | 12.02.2016

Captive Insurance: New IRS Tax Reporting Regime Potential for Penalties and Examinations
Article | *International Law Office*, 11.25.2016

Financier Worldwide Annual Review: Transfer Pricing 2016 – United States
Article | *Financier Worldwide*, 11.16.2016

New Regulations Change Allocation of Partnership Liabilities

Article | *International Law Office*, 11.04.2016

Captive Insurance: New IRS Tax Reporting Regime Potential for Penalties and Examinations

Tax Alert | 11.03.2016

New Regulations Change Allocation of Partnership Liabilities

Article | *Global Tax Weekly*, 11.03.2016

U.S. Tax Enforcers React to The Panama Papers

IFC Review, 09.01.2016

IRS Issues First Partnership Audit Regulations

Tax Alert | 08.08.2016

Is the United States Still a Tax Haven? The Government Acts on Tax Compliance and Money Laundering Risks

Article | *CCH's Journal of Tax Practice & Procedure*, 07.25.2016

Report of Foreign Bank and Financial Accounts (FBAR)

Book | *Bloomberg BNA's Tax Management Portfolio*, 06.29.2016

IRS to Hire 700 for Civil and Criminal Tax Enforcement

International Law Office, 05.20.2016

The Panama Papers and the U.S. Response: New Risks for Financial Institutions, Clients and Advisors

Tax Alert | 05.18.2016

IRS to Hire 700 for Civil and Criminal Tax Enforcement

Tax Alert | 05.05.2016

IRS Seeks Comments for New Tax Examination and Collection Regime

Article | *International Law Office*, 04.08.2016

Treasury Announces Regulations to Address Use of U.S. LLCs to Disguise Beneficial Ownership

Tax Alert | 04.05.2016

US Congress Enacts Entirely New Tax Examination and Collection Regime for Partnerships and LLCs

Article | *Family Office Elite Magazine*, 04.01.2016

IRS Seeks Comments to Promulgate Regulations for New Tax Examination and Collection Regime for Partnerships and LLCs

Tax Alert | 03.18.2016

IRS Criminal Investigation: A National Asset Being Damaged

Article | *Tax Notes*, 03.14.2016

IRS/DOJ Summons Seeks to Break Singapore Bank Secrecy on Non-Resident's Account

Tax Alert | 03.07.2016

2016 Federal Tax Benefits for Hiring Qualified Veterans, National Guard Members and Reservists

Book | *Caplin & Drysdale, Chartered*, 03.01.2016

Congress Enacts Entirely New Tax Examination and Collection Regime for Partnerships

Tax Alert | 12.10.2015

Derivative Benefits and Equivalent Beneficiaries - What Are We Talking About? Part II
Article | *International Tax Report*, 12.10.2015

U.S. Passports in Jeopardy for Taxpayers Owing the IRS
Tax Alert | 12.09.2015

Steps Foreign Persons Can Take to Avoid Unnecessary U.S. Estate Tax
Private Client Alert | 11.09.2015

Derivative Benefits and Equivalent Beneficiaries - What Are We Talking About? Part I
Article | *International Tax Report*, 11.05.2015

Transfer Pricing Audits: Flipping the Tested Party
Article | *International Law Office*, 08.28.2015

IRS Releases Guidelines for Examining CFC Transactions
Article | *International Law Office*, 08.21.2015

The Tax Planner's Tightrope: Morality and Politics Now in Play
Article | *International Law Office*, 08.14.2015

New Law Changes FBAR Filing Deadline
Tax Alert | 08.10.2015

The Practical Protection of Taxpayers' Fundamental Rights
Article | *International Fiscal Association 2015 Basel Congress*, 08.01.2015

IRS Releases Guidelines for Examining CFC Transactions
International Tax Alert | 07.29.2015

The Intersection of U.S. Tax Treaty Policy, Tax Reform, and BEPS
Article | *International Law Office*, 07.24.2015

Moore Requires 'More' Scrutiny of IRS-Imposed FBAR Penalties Under the Administrative Procedures Act
Article | *Family Office Elite Magazine*, 07.17.2015

FATCA – Enforcement Win or Expatriate Generator?
Article | *IFC Review*, 07.01.2015

Treasury Proposes Significant Changes to Model Tax Treaty
Article | *International Law Office*, 06.12.2015

Treasury Proposes Significant Changes to U.S. Model Treaty
Article | *Global Tax Weekly*, 06.04.2015

Treasury Proposes Significant Changes to U.S. Model Tax Treaty
International Tax Alert | 05.26.2015

Reflections on the Intersection of U.S. Tax Treaty Policy, U.S. Tax Reform, and BEPS
Article | *Tax Notes International*, 05.25.2015

The Tax Planner's Tightrope: Morality and Politics Now in Play
Article | *IFC Economic Report*, 05.05.2015

Abusive Small Captive Insurance Companies on IRS 'Dirty Dozen' List
Article | *International Law Office*, 02.27.2015

Abusive Small Captive Insurance Companies Added to IRS "Dirty Dozen Tax Scams"
Tax Alert | 02.13.2015

Proposed New York Tax Changes Would Affect Large and Small Businesses
Article | *International Law Office*, 01.30.2015

NYC Proposed Tax Code Changes Would Affect Businesses Large and Small
Business, Investment & Transactional Tax Alert | 01.13.2015

Switzerland Narrows Advance Notice to Account Holders of Treaty Requests: Americans with Unreported
Accounts Impacted
Tax Alert | 12.16.2014

Will the Rush to Invert Spur Corporate Tax Reform? A Conversation
Article | *Tax Notes International*, 12.15.2014

IRS Power To Regulate Tax Practitioners Slipping Away
Article | *Forbes*, 11.10.2014

OECD Releases Finalized Proposals on Key Tax Base Erosion Concerns
Article | *Global Tax Weekly*, 11.06.2014

U.S. Offshore Account Enforcement Issues
Article | *CCH's Journal of Tax Practice & Procedure*, 09.30.2014

OECD Releases Finalized Proposals on Key Tax Base Erosion Concerns
International Tax Alert | 09.23.2014

IRS Issues Final Regulations On Material Advisor Penalties
Article | *Global Tax Weekly*, 09.04.2014

Recent Changes in Circular 230: Where Are We Now?
Article | *Real Estate Journal*, 09.03.2014

IRS Issues Final Regulations on Material Adviser Penalties
Article | *International Law Office*, 08.29.2014

IRS Issues Final Regulations on Material Advisor Penalties
Tax Alert | 08.04.2014

Remain Vigilant On Indian Permanent Establishments, Even After the Favorable e-Funds Decision
Article | *Global Tax Weekly*, 07.10.2014

OECD's Proposed New Approach to Transfer Pricing of Intangibles: A Critique
Article | *New York University*, 06.29.2014

IRS Modifies Offshore Voluntary Disclosure Program and Streamlined Filing Compliance Procedures
Tax Alert | 06.23.2014

Strategies for Current Filings of Noncompliant Taxpayers as FBAR Deadline Approaches
Article | *Practical Tax Strategies*, 05.23.2014

Here Comes FATCA...What To Expect In 2014
Article | *IFC Review Monthly e-Journal*, 04.01.2014

Remain Vigilant on Indian Permanent Establishments, Even After the Favorable e-Funds Decision
International Tax Alert | 03.27.2014

The New APMA Procedures — Cosmetic or Cosmic?
Article | *Tax Management International Journal*, 03.14.2014

Enforcing Non-U.S. Tax Authority Requests for Taxpayer Information
Article | *International Law Office*, 03.07.2014

Bold Shift in IRS Approach to Transfer Pricing Controversies
International Tax Alert | 02.27.2014

Surprise! Your Foreign Tax Credit Is Not Allowed Under Section 901(l)
Article | *Tax Notes International*, 01.14.2014

Washington Tax Roundup
Article | *Washington Jewish Week*, 01.08.2014

Here Comes FATCA...What to Expect in 2014
Article | *IFC Review*, 01.04.2014

Weighing Fiduciary Duties with 21st Century Realities – Evaluating the Viability of Remote Participation for Boards of Directors
Article | *1 Emory Corp. Governance & Accountability Rev.* 43, 01.01.2014

Jurisdictional Uncertainty in Trust Fund Recovery Penalty Cases
Article | *Tax Notes*, p. 963, 12.16.2013

Overview of the OECD'S Action Plan on Base Erosion and Profit Shifting
Article | *Corporate Taxation*, 11.01.2013

DOJ Deal with Swiss Banks Impacts U.S. Taxpayers and Financial Firms Around the World
Tax Alert | 10.31.2013

Washington Post Releases Database of Reported Nonprofit Asset Diversions
Exempt Organizations Alert | 10.30.2013

The Justice Department and Swiss Banks: Understanding the Special Disclosure Program
Article | *Bloomberg BNA*, 09.24.2013

Tax Implications of Natural Disasters
Article | *ABA Section of Taxation and Section of Real Property, Trust & Estate Division*, 09.01.2013

Me, Myself, and My Subsidiary: A Shift in the Intent Standard in Related-Party Hybrid Debt Cases
Article | *Corporate Taxation*, 09.01.2013

Stalled Applications for Section 501(c)(3) Status: Is it Time to Sue the IRS?
Exempt Organizations Alert | 08.16.2013

Amazon.com v. Commissioner: Veritas Redux?
Article | *Corporate Taxation*, 08.01.2013

Here Are the Implications of Singapore's Move to FATCA Compliance
Article | *Singapore Business Review*, 07.29.2013

The Crucial Implications of FATCA for U.S. Citizens in Hong Kong

Article | *Hong Kong Business*, 07.25.2013

2013 Federal Tax Benefits for Hiring Qualified Veterans, National Guard Members and Reservists

Book | *Caplin & Drysdale, Chartered*, 06.03.2013

Low-Income Students Must Aim High, Seize Opportunities Offered to Them

Article | *Detroit Free Press*, 05.07.2013

Global Netting: Potential Opportunities for Corporate Taxpayers

Article | *WTE Practical International Tax Strategies, Volume 17, Number 8*, 04.30.2013

Global Netting: Potential Opportunities for Corporate Taxpayers

Business, Investment & Transactional Tax Alert | 04.10.2013

Professional Golfer Sergio Garcia to Owe More Taxes on Endorsement Income

International Tax Alert | 03.15.2013

The Rescission Decision

Article | *Tax Talk, Section of Taxation, Maryland State Bar Association*, 03.01.2013

Mutual Administrative Assistance in Tax Matters

Article | *Journal of Corporate Taxation*, 03.01.2013

Cruising Toward Safe Harbors for Transfer Pricing?

Article | *Corporate Taxation*, 03.01.2013

Recent Developments: U.K. Excess Profits Tax Under the U.S. Foreign Tax Credit

Article | *Corporate Taxation*, 01.01.2013

FATCA: A New Era of Financial Transparency

Article | *AICPA's Journal of Accountancy*, 01.01.2013

Transfer Pricing: Rules and Practice in Selected Countries (H-1), No. 6955

Article | *Bloomberg BNA Tax Management Portfolio*, 01.01.2013

Safe at Last? Transfer Pricing Safe Harbors on the Horizon

Article | *Bloomberg BNA*, 09.06.2012

Is the Limited Scope Marketed Opinion Preparing for a Comeback?

Article | *Tax Talk, Section of Taxation, Maryland State Bar Association*, 09.01.2012

Article from Tax Analysts, Switzerland and the U.S.: What We Have Here is a Failure to Communicate

Tax Analysts, by H. David Rosenbloom, 06.04.2012

Offshore Tax Evasion: US Initiatives

Article | *Practical Law Company*, 04.26.2012

ABA Section of Taxation Comments on Proposed Amendments to the Rules of the United States Tax Court

Article | *American Bar Association*, 03.01.2012

Case Updates-Dell Products (Norway) General Electric Capital (Canada) SNF (Australia)

Article | *Corporate Taxation*, 03.01.2012

Commissionaire and Contract Manufacturing Arrangements - New Developments on Permanent Establishment Issue

Article | *Corporate Taxation*, 01.01.2012

Federal Judge Grants IRS "John Doe" Summons Seeking California Gift Tax Records

Private Client Alert | 12.22.2011

Offshore Tax Enforcement, Voluntary Disclosure, And Undeclared Foreign Accounts

Article | *ALI-ABA Estate Planning Course Materials Journal*, 12.01.2011

The APA Program's Experience With Rev. Proc. 2008-31: Increased Opportunities for Certainty

Article | *Bloomberg BNA Tax Management Memorandum*, 11.07.2011

2010 Treaty Developments

Article | *Corporate Taxation*, 11.01.2011

The Case for Tradable Tax Credits

Article | *8 N.Y.U. J.L. & BUS.* 227, 11.01.2011

OVDI Is Over — What's Next for Voluntary Disclosures?

Article | *Tax Notes, Special Report*, 10.17.2011

Qualified Intermediaries, The EU Savings Directive, Trace--What Does FATCA Really Add

Article | *Corporate Taxation*, 09.01.2011

Unreported Gifts of Real Property: Time for a Voluntary Disclosure?

Article | *Tax Notes*, 08.01.2011

LB&I Commissioner Provides Guidance to Examiners and Managers on the Codified Economic Substance Doctrine and Related Penalties

Tax Alert | 07.29.2011

India's Proposed Direct Taxes Code - Highlights For Corporate Taxpayers

Article | *Corporate Taxation*, 07.01.2011

Crawford's Last Stand? What *Melendez-Diaz v. Massachusetts* Means for the Confrontation Clause and for Criminal Trials

Article | *2 AKRON J. CONST. L. & POL'Y* 81, 06.02.2011

FATCA & Foreign Bank Accounts: Has the U.S. Overreacted?

Article | *Tax Analysts*, 05.31.2011

Final Rules & New FBAR Form Issued

International Tax Review, 05.01.2011

ITPF - Georgetown University Law Center Conference on Reform of International Tax

Article | *Corporate Taxation*, 05.01.2011

IRS Seeks Names of U.S. Account Holders at HSBC (India)

Article | *Taxmann-The Tax & Corporate laws of India-International Tax*, 04.18.2011

Comments to the Proposed Amendments to the Rules of the United States Tax Court

Article | *American Bar Association*, 03.07.2011

Comments to the Proposed Amendments to the Rules of the United States Tax Court

Article | *American Bar Association*, 03.07.2011

Putting an End to Foreign Tax Credit 'Splitting' Transactions

Article | *Corporate Taxation*, 03.01.2011

ABA Section of Taxation Comments on Proposed Amendments to the Rules of the United States Tax Court

Article | *American Bar Association*, 03.01.2011

Indictment of Offshore Account Holder Portends a New Round of Aggressive Enforcement

Article | *International Taxation*, 02.01.2011

Responsible Person and Lender Liability for Trust Fund Taxes – Sections 6672 and 3505

Article | *Tax Management Portfolio Series*, 01.03.2011

U.S. Federal Tax Research

Article | *Tax Management Portfolio Series*, 01.03.2011

Effectively Representing Your Client Before the IRS

Article | *American Bar Association*, 01.03.2011

President Obama's Efforts at International Tax Reform

Article | *Corporate Taxation*, 01.01.2011

The Foreign Account Tax Compliance Act and Notice 2010-60

Article | *International Taxation*, 12.01.2010

IRS's Voluntary Disclosure Program for Offshore Accounts: A Critical Assessment After One Year

Article | *BNA Insights*, 09.21.2010

Advise Client Companies to Review Payroll Practices

Article | *Verizon Small Business Center's News & Resources*, 09.10.2010

Federal and State Governments Target Employment Tax Compliance

Article | *Taxation of Exempts*, 09.01.2010

A Shift Toward Consumption Taxes: The Tax Policy Prescription For The Fiscal Ills of The Global Financial Crisis

Article | *Corporate Taxation*, 07.01.2010

Once Again Employment Tax Compliance at the Forefront of IRS's Enforcement Agenda

Article | *Bloomberg Law Reports*, 06.21.2010

The Foreign Account Tax Compliance Act

Article | 05.11.2010

IRS Scrutinizes Payroll Practices, Challenges for Companies

Article | *Financial Executive*, 05.01.2010

Loan Guarantees and Transfer Pricing

Article | *Corporate Taxation*, 05.01.2010

Taxpayer Wins LIFO Case in the Court of Federal Claims

Article | *Real Estate Finance Journal*, 04.01.2010

More Foreign Financial Account Reporting

International Tax Alert | 03.26.2010

Looking for FBARs in All the Wrong Places? Limited Relief in New Interim Guidance
International Tax Alert | 03.15.2010

The New Battle In An Old War: Omissions From Gross Income
Article | *126 Tax Notes 1227*, 03.08.2010

IRS Scrutiny of Equity Swaps Could Impact Offshore Funds
Article | 03.05.2010

National Westminster Bank: Will the IRS Ever Give Up
Article | *Corporate Taxation*, 03.01.2010

Get Ready for the Employment Tax Compliance Surge: IRS to Challenge Status of Independent Contractors
Employee Benefits Alert | 02.18.2010

Kiva Dunes and Golf Course Conservation Easements: Important Implications for Tax Deductibility of
Conservation Easement Contributions
Article | *Free State Accountant*, 01.01.2010

The Curious Case of The Partial Loophole Closer
Article | *Corporate Taxation*, 01.01.2010

Undeclared Foreign Accounts—Voluntary Disclosures and FBARs After the IRS Settlement Initiative
Article | *Journal of Tax Practice and Procedure*, 12.01.2009

2009 Treaty Developments
Article | *Corporate Taxation*, 11.01.2009

Summary of Recent Developments for 2009
Article | *American Bar Association Section of Taxation, Court Procedure & Practice Committee*, 09.01.2009

Sotomayor Record Indicates Penchant for Protectionist State Tax Policies
Article | *Tax Foundation*, 07.16.2009

Justice Souter's Tax Opinions Show Steady Erosion of Respect for Commerce Clause
Article | *Tax Foundation Fiscal Facts, No. 173*, 06.03.2009

Comments to the Proposed Amendments to the Rules of the United States Tax Court
Article | *American Bar Association*, 05.27.2009

Comments to the Proposed Amendments to the Rules of the United States Tax Court
Article | *American Bar Association*, 05.27.2009

Resolución de Conflictos en Material Fiscal (in Spanish)
Article | *Revista - Instituto Colombiano de Derecho Tributario*, 05.10.2009

Selected Recent Developments in Administrative Practice
Article | *American Bar Association (May Meeting, Administrative Practice Committee)*, 05.08.2009

From the House that Ruth Built to the House the IRS Built
Article | *Tax Foundation Fiscal Facts, No. 167*, 04.06.2009

Cross-Border Information Reporting & Civil Penalties (in a Nutshell)
Article | *Journal of Tax Practice & Procedure*, 04.01.2009

States Use Gentle Hand in Taxing Timberland

Article | *Tax Foundation Fiscal Facts, No. 164*, 03.25.2009

Voluntary Disclosure Key to Addressing Offshore Tax Cheats, Practitioners Say

Article | *Tax Analysts*, 12.08.2008

A \$200,000 Penalty for a \$25,000 Deduction?!?!: the High Price of Failing to Disclose Listed Transactions Under Section 6707A of the Code

Article | 11.07.2008

Summary of Recent Developments for 2008

Article | *American Bar Association Section of Taxation, Court Procedure & Practice Committee*, 09.01.2008

The Malpractice Environment for Tax Lawyers in the United States

Article | *Practice Exposures for the International Tax Professional in the 21st Century, 37 Tax Management International Journal 431*, 08.08.2008

Conservation Easements Under Fire: A Five-Point Strategy to Defend the Deduction

Article | *Maryland Society of Accountants: The Free State Accountant*, 06.01.2008

Voluntary Disclosure Becomes A Necessity

Article | *International Tax Review*, 05.01.2008

Tax Crimes: Has the Bright Line Moved?

Article | *Law Journal Newsletters*, 02.01.2008

'Prior Work' Can Create Ethical and Malpractice Risk

Article | *ABA Section of Taxation NewsQuarterly*, 12.01.2007

IRS Sends Mixed Messages to Nonprofits

Article | *POLITICO*, 10.16.2007

Developments Aplenty in the KPMG Tax Case: Partial Dismissal, and Court-Ordered Transparency In Entity/Government Negotiations

Article | 09.30.2007

Treasury, IRS Continues Attack on Abusive Tax Transactions: Final Regulations for Reportable Transactions Issued

Article | *Derivatives Financial Products Report*, 09.01.2007

Meeting Newsletter

Article | *American Bar Association Section of Taxation, Court Procedure & Practice Committee (2006-2007)*, 05.01.2007

COMMENT: Deputy-Doctors: The Medical Treatment Exception after Davis v. Washington

Article | *43 CAL. W. L. REV. 451, 2007*, 05.01.2007

ABA's Comments Concerning the Tax Court's Proposed Amendments Regarding Privacy and Public Access to Electronic Case Files

Article | *American Bar Association*, 04.13.2007

Blame It on Transparency

Article | *Tax Notes*, 03.05.2007

Pay Immediate Attention to Far-Reaching Regulations on Intercompany Services
Article | *Caplin & Drysdale*, 10.01.2006

New Penalties for Tax-Exempt Entities and Managers
Article | *Caplin & Drysdale*, 10.01.2006

Thou Shalt Not Profit, Part I: New Penalties for Tax-Exempt Entities and Managers
Article | *Health Lawyers Weekly*, 09.08.2006

A Rare Look Inside The IRS's Office of Professional Responsibility
Article | *Journal Of Tax Practice and Procedure*, 05.01.2006

Deferred Prosecution Agreements: Implications for Corporate Tax Departments
Article | *The Tax Executive*, 02.01.2006

Proposed Cost-Sharing Regulations Issues
Article | *Caplin & Drysdale*, 01.15.2006

IRS Launches Settlement Initiative for Certain "Abusive Transactions"
Article | *Caplin & Drysdale*, 01.15.2006

Tax Planning for Involuntary Conversions
Article | *Tax Notes*, 10.03.2005

Enhanced IRS Enforcement and the Voluntary Disclosure Policy
Article | *International Law Office*, 08.26.2005

I'll Pay, but Let's Not Call It a Fine: Code Sec. 162(f) Issues in Structuring Settlement Payments - Five Lessons from LTR 200520241
Article | *Taxes - The Tax Magazine*, 07.05.2005

Tax Shelter Reform
Article | *Caplin & Drysdale*, 11.01.2004

Stop the Presses (Book Review)
Article | *Law Practice Magazine*, 09.01.2004

News on the Transfer Pricing Front
Article | *Caplin & Drysdale*, 07.01.2004

Foreign Bank Accounts - Last Chance for Taxpayers?
Article | *Caplin & Drysdale*, 07.01.2004

But I Don't Sell Tax Shelters! The Expanding Reach of the Code Sec. 6700 Promoter Penalty
Article | *Taxes - The Tax Magazine*, 06.01.2004

Transfer Pricing: New Rules for Services and Intangibles
Article | *Caplin & Drysdale*, 11.01.2003

"Hot Interest" for Large Corporate Underpayments
Article | *Caplin & Drysdale*, 11.01.2003

Recent Developments in the Tax Shelter Area
Article | *Caplin & Drysdale*, 11.01.2003

Corporate Taxation: New Consolidated Return Duplicated Loss Rules

Article | *Caplin & Drysdale*, 04.01.2003

Tax Advice After Sarbanes-Oxley

Article | *Caplin & Drysdale Tax Advice*, 01.24.2003

Taxpayer Privacy and Disclosure Issues Will Continue to Touch Us All

Article | *The Future of American Taxation (Tax Analysts)*, 12.01.2002

Accounting Methods - Which Retroactive 'Corrections' Require IRS Consent?

Article | *Tax Lawyer*, Vol. 56, No. 101, 09.01.2002

Treasury Department Closing the Door on Tax Shelters

Article | *Washington Business Journal*, 08.05.2002

Tax Accounting Monthly Column

Article | *Corporate Business Taxation Monthly*, 08.01.2002

The IRS Reorganization: Programs and Initiatives of the New Large Case Division

Article | *Administrative Law Review*, Vol. 53, No. 2, 05.01.2001

The Disclosure Debate Rages On ... And On

Article | *89 Tax Notes 419*, 10.16.2000

Important Points to Remember: The Disclosure Debate

Article | *89 Tax Notes 301*, 10.09.2000

Transfer Pricing: A Special Report

Article | *International Tax Review Supp. 31*, 07.01.2000

The UPS, Limited and Compaq Cases: Is the Tide Turning?

Article | *26 International Tax J. No. 3, 1*, 06.01.2000

Tax-Exempt Bond Issuers Should Welcome an Excise Tax

Article | *21-2 Municipal Finance Journal 55*, 06.01.2000

Responses to the 'Lurking Marriage Penalty'

Article | *National Law Journal*, 10.04.1999

The Hamas Deportation: Israel's Response to Terrorism During the Middle East Peace Process

Article | *10 Am. U. J. Intl'l & Pol'y 397*, 01.01.1994