

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

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Program: Privileges and Penalties – Maximizing Your Protections and Minimizing Your Regrets (Ethics)

Event Sponsor: USA Branch of International Fiscal Association, International Tax Conference: The Tax Cuts and Jobs Act - A Three-Year Review

This panel will address hot issues and current developments in privileges and penalties. Using the ongoing *Sanmina* controversy as a springboard the panel will illustrate through realistic fact patterns what we know and don't know about when various privileges attach in the first instance, how taxpayers can share privileged communications with those who need to know (preparers, valuation experts, accountants, counterparties, the IRS), how to avoid having a selective disclosure become a subject matter waiver, and how to avoid other pitfalls and bad consequences.

### **Attorneys**

Amanda M. Leon

### **Related Practices/Industries**

International Tax

Tax Disputes & Tax Litigation