

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

12.07.2012

The 29th Annual National Institute on Criminal Tax Fraud is the annual gathering of the criminal tax defense bar combined with the Second Annual National Institute on Tax Controversy. This program brings together high-level government representatives, judges, corporate counsel, and private practitioners engaged in all aspects of tax controversy, tax litigation and criminal tax defense.

As in past years, this joint institute will offer the most knowledgeable panelists from the government, the judiciary and the private bar. Attendees will include attorneys and accountants who are just beginning to practice in tax controversy and tax fraud defense, as well as those who are highly experienced practitioners. The breakout sessions will encourage an open discussion of hot topics. The program will provide valuable updates on new developments and strategies, along with the opportunity to meet colleagues, renew acquaintances and exchange ideas.

From the reorganization of its Large Business and International Division to its scrutiny of global high wealth taxpayers and offshore activities, the IRS has recently focused on international enforcement. Both institutes will examine these and other current issues. The breakout sessions will include roundtable discussions with senior representatives from the IRS, Treasury and Justice Departments, as well as panels focused on topics ranging from the nuts-and-bolts of representing clients in examination, at appeals, at trial and in criminal investigations, to the hottest areas of civil and criminal enforcement. This event promises to be a program that no tax litigator should miss.

Caplin & Drysdale's Scott Michel will moderate the panel "*Foreign Assets: From Voluntary Disclosure to FATCA.*" For over three years, bank accounts from Liechtenstein to Switzerland to Israel to the world have been a key focus of tax enforcement. This panel will discuss where we have been, where we are, and as we get ready for FATCA, where we are going.

The panel will be held from 10:00 AM to 11:00 AM on Friday, December 7, at the Wynn Las Vegas.

For more information and to register for the event, [click here](#).

Attorneys

Scott D. Michel

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