

# MANAGING TAX AUDITS AND APPEALS - 2017

**Thursday, October 5, 2017**

**Washington, DC**

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|-------------------|--|----------------------|
| <b>8:30 am</b>    | Registration<br>Coffee and Danish  |                      |
| <b>9:00 am</b>    | Welcome and Introductory Remarks   | <i>David Blair</i>   |
| <b>9:15 am</b>    | LB&I's Issue-Focused Audit Paradigm – One Year Later; Status of IRS Enforcement Campaigns; Handling the New Acknowledgement of Facts IDR; Recurring Audit Issues Affecting Large Corporate Taxpayers (2017)  | <i>David Blair</i>   |
| <b>10:15 am</b>   | Current Developments in International Tax: IRS Transfer Pricing Roadmap in Practice; TIGTA Report on Settlements in Appeals; Trends in Transfer Pricing Litigation; Secondary Effects of Secondary Adjustments   | <i>David Fischer</i> |
| <b>10:45 am</b>   | Break  |                      |
| <b>11:00 am</b>   | <p>Guest Speakers –</p> <p>John Wall<br/>Assistant Director, Advance Pricing and Mutual Agreement Program</p> <p>Anthony Ferrise<br/>Acting Assistant Director, Advance Pricing and Mutual Agreement Program</p> <p>Transfer Pricing Update – LB&amp;I Competent Authority Business Unit; the Accelerated Competent Authority Process; Current Practice Developments in Competent Authority and Advance Pricing Agreements; BEPS Peer Review; Country-by-Country Reporting</p> | <i>David Fischer</i> |
| <b>12:00 Noon</b> | <p>Luncheon Guest Speaker –</p> <p>Drita Tonuzi<br/>Deputy Chief Counsel, Internal Revenue Service</p> <p>APA Litigation and Its Impact on the IRS Guidance Process: IRS Resource Constraints</p>  |                      |

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| <b>1:45 pm</b> | Employee Benefits – Scratch the Tax – Health Savings Accounts – Move over 401(k)s   | <i>David McFarlane<br/>Samuel Krause</i> |
| <b>2:15 pm</b> | Guest Speaker –<br><br>Richard Grafmeyer<br>Partner, Capitol Tax Partners<br><br>Prospects for Fundamental Tax Reform Legislation   | <i>Scott Douglas<br/>James Flood</i>     |
| <b>3:30 pm</b> | Break   |  |
| <b>3:45 pm</b> | Partnerships – Upcoming Changes to IRS Audits of Partnerships; Comparison to TEFRA Partnership Audits; Updating Partnership and LLC Agreements  | <i>Jennifer Ray<br/>Teresa Abney</i>     |
| <b>4:30 pm</b> | Guest Speakers –<br><br>Sheldon Laskin<br>Counsel, Multistate Tax Commission<br>Fredrick Nicely<br>Senior Tax Counsel, Council on State Taxation<br><br>State Perspectives: The Quest for Clarity and Uniformity in Reporting Federal Tax Adjustments | <i>Jeremy Abrams</i>                     |
| <b>5:15</b>    | Adjournment   | <i>David Blair</i>                       |
| <b>5:30</b>    | Cocktail Reception  |  |

# MANAGING TAX AUDITS AND APPEALS - 2017

Friday, October 6, 2017

Washington, DC

|                   |  |                         |
|-------------------|--|-------------------------|
| <b>8:30 am</b>    | Coffee and Danish  |                         |
| <b>9:00 am</b>    | Recent Developments in the Law of Privilege and the Work Product Doctrine  | <i>Robert Willmore</i>  |
| <b>9:45 am</b>    | Corporate Developments – Section 6901; When Does a Purchaser of Assets Inherit the Seller’s Tax Liabilities?   | <i>Charles Hwang</i>    |
| <b>10:15 am</b>   | Break  |                         |
| <b>10:30 am</b>   | Developments at IRS Appeals – Changes to Appeals Procedures; Exam Presence at Appeals Conferences; Face-to-Face Conferences; New Limitations on Appeals Settlement Authority; AJAC in Practice – New Facts and New Issues  | <i>David Fischer</i>    |
| <b>11:30 am</b>   | Guest Speaker –<br><br>Neville Jiang, Senior Manager, Deloitte Tax<br><br>Developments in Tax Accounting – New Audit Technique Guide for Tangible Property Regulations; When Can IRS Assert a Change in Method of Accounting?; National Office Reasserts Authority over Change in Method Issues Raised by the Taxpayer; Developments under Section 199 | <i>Dwight Mersereau</i> |
| <b>12:00 Noon</b> | Concluding Remarks   | <i>David Blair</i>      |