MANAGING TAX AUDITS AND APPEALS – 2016

Thursday, September 22, 2016
Marina del Rey, CA

8:30 am **9:00 am**	Registration Coffee and Danish
9:00 am **9:15 am**	Welcome and Introductory Remarks
9:15 am **10:15 am**	LB&I's New Issue-Focused Audit Paradigm; Impact of Changes on CAP; Handling the New Acknowledgement of Facts IDR; Recurring Audit Issues Affecting Large Corporate Taxpayers (2016); Recent Developments in Large Case Audits
10:15 am **10:45 am**	Recent Developments in the Law of Privilege and the Work Product Doctrine
10:45 am **11:00 am**	Coffee Break
11:00 am **12:00 Noon**	Guest Speaker (Counsel to California Franchise Tax Board) – California litigation update: from Gillette (Multistate Compact apportionment election) to Abercrombie (constitutionality of combined reporting rules for out-of-state companies); State Transfer Pricing Issues and Interplay between State, Federal, and International Audits, Including Competent Authority and the OECD's BEPS Initiative; California's audit and settlement program; special topics in California audits.
12:00 Noon **1:30 pm**	Luncheon Speaker – Legislative and Administrative Proposals Impacting the Exam and Appeals Processes

1:30 pm **2:30 pm**	Guest Speaker (Advance Pricing and Mutual Agreement Program (APMA)) – Impact of LB&I Changes on Transfer Pricing; Should You Request an Advance Pricing Agreement (APA); Impact of APAs on Audits; Impact of OECD Base Erosion and Profit Shifting (BEPS) Action Items on APMA; Country-By-Country Reporting; Current Developments Regarding APAs and Competent Authority
2:30 pm **3:15 pm**	Upcoming Changes to IRS Audits of Partnerships; Comparison to TEFRA Partnership Audits; Preparing for the Changes
3:15 pm **3:30 pm**	Coffee Break
3:30 pm **4:15 pm**	Fast Track Settlement; Developments at IRS Appeals; Appeals Judicial Approach and Culture in Practice
4:15 pm **5:15 pm**	Recent Developments in Tax Accounting; Repair Regulations; Section 199; Approaches to Accounting Method Issues at Appeals
5:15 pm	Adjournment
5:30 pm	Crowell & Moring LLP Reception