

2025 Tax Seminar Agenda

Wednesday, October 29, 2025

6:00–8:00 p.m. | **Welcome Reception at The Willard and Ghost Tour**

Thursday, October 30, 2025

8:30–8:50 a.m. | **Registration & Breakfast**

8:50–9:00 a.m. | **Welcome and Introductory Remarks**

9:00–10:00 a.m. | **IRS LB&I Enforcement Priorities and Resources**

- **Description:** The IRS Large Business and International (LB&I) division is undergoing significant changes, including leadership shakeups, rescinded Inflation Reduction Act funding, and directives to streamline audits. This panel will discuss how these changes create both opportunities and challenges for taxpayers.

Guest Speaker: Mark Nyman, Former IRS LB&I Director, Corporate Issues and Credits

10:00–11:00 a.m. | **Litigation Landscape: Case Law Updates and How Changes at DOJ and IRS Counsel Have Changed the Litigation Calculus for Taxpayers**

- **Description:** Learn about recently decided tax cases and ones to watch in the coming months. Discuss how the elimination of the DOJ Tax Division and leadership and staffing changes at IRS might affect your company's decision to litigate tax disputes and make choice of forum decisions.

Guest Speaker: Julie Avetta, Former DOJ Tax attorney (Appellate Division), Senior Attorney Advisor-Litigation, NYU Tax Law Center

11:00 a.m.–12:00 p.m. | **Best Practices: 20 Tips from Transaction through Litigation**

- **Description:** From documentation in the planning stage, executing transactions, reporting and disclosure, opening the audit, responding to IDRs and interview requests, through closing the audit and resolving issues, this panel gives you practice pointers to ensure that your company is audit-ready and that you navigate the audit efficiently while maximizing the potential for a favorable outcome.

12:00–1:00 p.m. | **Lunch Buffet**

1:00–2:00 p.m. | **A View from the Bench: What a Tax Court Judge Wants Taxpayers to Know**

- **Description:** Judge Travis Greaves will discuss his views on issues such as discovery in Tax Court, expert witness testimony, resolution before trial, and what taxpayers should know before filing in the Tax Court.

Guest Speaker: The Honorable Travis Greaves, United States Tax Court

2:00–2:30 p.m. | **Coffee Break**

2:30–3:30 p.m. | **Update on Independent Office of Appeals: Paths to Resolution**

- **Description:** Learn how the Independent Office of Appeals has changed under the current administration, including recent emphasis on Post-Appeals Mediation and Fast Track Settlement initiatives.

Guest Speaker: Matthew Cooper, Principal, Washington National Tax Controversy Services, Deloitte Tax LLP

3:30–4:30 p.m. | **Client Roundtable**

- **Description:** Clients share issues they are facing and the strategies they are using for effective and efficient resolution with the IRS, while maintaining good working relationships with their IRS exam teams.

4:30–6:00 p.m. | **Closing Remarks Followed by Cocktail Reception**