


MANAGING TAX AUDITS AND APPEALS – 2013

Day 1: Thursday, October 3, 2013 (DC)/October 17, 2013 (CA)

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| 8:30 a.m. | - | Registration |
| 9:00 a.m. | | |
| 9:00 a.m. | - | Welcome and Introductory Remarks |
| 9:15 a.m. | | |
| 9:15 a.m. | - | Recurring Audit Issues Affecting Large |
| 10:30 a.m. | | Corporate Taxpayers (2013); Formulating |
| | | Alternative Audit and Appeals Strategies |
| | | for Large Corporate Audits |
| 10:30 a.m. | - | Coffee Break |
| 10:45 a.m. | | |
| 10:45 a.m. | - | Guest Speaker -- |
| 12:00 noon | | (Large Business and International Division, |
| | | Internal Revenue Service) |
| | | Current Transfer Pricing Developments; |
| | | Forthcoming Changes to the Advance Pricing |
| | | Agreement and Competent Authority |
| | | Revenue Procedures |
| 12:00 noon | - | Luncheon |
| 2:00 p.m. | | Guest Speaker -- |
| | | (Appeals Office, |
| | | Internal Revenue Service) |
| | | Current National Appeals Office |
| | | Developments; Appeals Office Initiatives |
| | | for Coordinating Large Cases |

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- 2:00 p.m. - Dealing with State and Local Tax Audits;
 - 2:45 p.m. - Current State Tax Audit Developments;
Who Should Be Handling Your Unclaimed
Property Audits: Kovel Letters, Non-Disclosure
Agreements, Statistical Sampling, Penalties, etc.

 - 2:45 p.m. - Anticipating Audit Issues Under the
 - 3:30 p.m. - Patient Protection and Affordable Care Act;
Current Issues in Employee Benefit Audits

 - 3:30 p.m. - Coffee Break
 - 3:45 p.m.

 - 3:45 p.m. - Guest Speaker --
 - 4:15 p.m. - Legislative and Administrative Proposals
Impacting the Audit and Appeals Process

 - 4:15 p.m. - Use of the Administrative Procedure Act
 - 4:45 p.m. - To Challenge IRS Actions and Pronouncements

 - 4:45 p.m. - Authority To Sign on Behalf of a
 - 5:30 p.m. - Corporation, Limited Liability Company,
Partnership or Other Entity -- Tax Returns,
Forms 870 and 872, Closing Agreements, etc.;
Strategic Audit Considerations in
Transfer Pricing Controversies; Current
Developments in Transfer Pricing Audits

 - 5:30 p.m. - Adjournment

 - 5:45 p.m. - Crowell & Moring LLP Reception

Day 2: Friday, October 4, 2013(DC)/October 18, 2013(CA)

- 8:30 a.m. - Coffee and Danish
9:00 a.m.
- 9:00 a.m. - Guest Speaker --
10:00 a.m. (Large Business and International Division,
Internal Revenue Service)
Large Case Audits; Compliance Assurance
Process; Fast Track Procedure; Enforcement
Initiatives and Accelerated Issue Resolution
Programs, etc.
- 10:00 a.m. - Guest Speaker --
10:30 a.m. (Large Business and International Division,
Internal Revenue Service)
Large Case Audits: Pre-Filing Agreements
and Technical Guidance
- 10:30 a.m. - Guest Speaker --
11:00 a.m. Post Settlement Issues: Recent Developments
in Partnership Tax Audits -- Disguised Sales
and Deemed Partnership Issues
- 11:00 a.m. - Coffee Break
11:15 a.m.
- 11:15 a.m. Guest Speaker --
11:45 a.m. Current Developments in Computing
Interest on Refunds and Deficiencies; Deposits
Made To Suspend the Running of Interest
- 11:45 a.m. - Dos and Don'ts in IRS Audits: A Primer
12:15 p.m. on New Rules of Engagement; Developments
in Work-Product Doctrine and Attorney-Client
Privilege Issues
- 12:15 p.m. - Concluding Remarks