

MANAGING TAX AUDITS AND APPEALS – 2014

Day 1: Thursday, October 9, 2014 (DC)/October 23, 2014 (SF)

- 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 (2014); Dealing with
New Challenges Facing Large Corporate Audits
- 10:30 a.m. - Coffee Break
10:45 a.m.
- 10:45 a.m. - Compliance Assurance Process -- Navigating
11:15 a.m. Recent and Pending Developments in CAP Audits
- 11:15 a.m. - Developments in Transfer Pricing Audits;
12:00 noon Advance Pricing Agreements and Competent
Authority Procedures; OECD Base Erosion and
Profit Shifting Proposals
- 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
- 2:00 p.m. - Dealing with State and Local Tax Audits;
2:45 p.m. Current State Tax Audit Developments;
Unclaimed Property Audits; Filing Claims
for Refund in State Tax Audits

- 2:45 p.m. - Joint Committee Refund Procedures;
3:30 p.m. Your Taxable Year Is Closed (Not)
- 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. - New IDR Enforcement Policies and
4:45 p.m. Summons Procedures; Recent Developments
in Executive Compensation and Worker
Classification Audits
- 4:45 p.m. - A Primer on Audit Strategies for Dealing with
5:30 p.m. National Office Involvement in a Hot Audit Issue:
When to Engage; When to Wait; Tax Opinion
Privilege Claims; Financial Disclosure Issues
- 5:30 p.m. - Adjournment
- 5:45 p.m. - Crowell & Moring LLP Reception

Day 2, Friday, October 10, 2014 (DC)/October 24, 2014 (SF)

- 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. - Hot Audit Issues -- Responding to
10:30 a.m. Pre-Seminar Topics Raised by Attendees
- 10:30 a.m. - Coffee Break
10:45 a.m.
- 10:45 a.m. - Recent Developments in Partnership Tax Audits;
11:15 a.m. FATCA Launch and Its Implications
- 11:15 a.m. - Guest Speaker --
11:45 a.m. Current Developments in Computing Interest
on Refunds and Deficiencies; Interest Netting
after Corporate Reorganizations
- 11:45 a.m. - Use of Experts in Fast Track and at Appeals;
12:15 p.m. Developments in Work-Product Doctrine and
Attorney-Client Privilege Issues
- 12:15 p.m. - Concluding Remarks