

BNA/CITE Announces a New Conference Series on

Resolving IRS Tax Controversies

**How to Prepare for Audits and Appeals, Resolve
IRS Disputes, Mitigate Penalties and Understand
Alternative Dispute Resolution Methods**

A two-day comprehensive overview with live group instruction on what the IRS is looking for on audit and dealing with IRS agents during tax audits

**New from
CITE in 2011!**

Washington, DC • October 24 & 25, 2011

Miller & Chevalier Law Offices

Houston • November 7 & 8, 2011

The Houstonian Hotel

Benefits you Receive by Attending this Meeting include:

- ▲ Find out how the IRS audit process is initiated and what to expect at your first meeting
- ▲ Learn how to resolve a Tier 1 issue and what it means to be in “monitoring status”?
- ▲ Understand how transfer pricing controversies originate and how to make them go away - use of APAs and competent authority
- ▲ Discover the impact of an IRS controversy on a company’s financial statements
- ▲ Determining which documents qualify for the attorney-client privilege or work product doctrine
- ▲ Discover the scope of IRS withholding tax audits on payments to foreign persons
- ▲ Understanding Exchange of Information Agreements and their use in IRS and foreign-initiated audits
- ▲ Find out whether to settle an audit assessment at appeals or using an alternative dispute resolution method
- ▲ Learn whether you should choose to litigate your assessment or whether you should pay the tax and file a refund claim

Earn up to 16 CPE/CLE Credits

Conference Sponsor: **CETERIS**

**REGISTER TODAY & Save \$200
with Our Early-Bird Discount!**

Resolving IRS Tax Controversies

Washington, DC • October 24 & 25, 2011 • Miller & Chevalier Law Offices
Houston • November 7 & 8, 2011 • The Houstonian Hotel

David Blair
Miller & Chevalier
Washington, DC

Co-Chairs:
Kenneth Clark
Fenwick & West LLP
Mountain View

Sharon Katz-Pearlman
KPMG LLP
New York

Mark Bronson
Ceteris
Boston

Faculty:

Charles Ruchelman
Caplin & Drysdale
Washington, DC

David Cole
Vinson & Elkins LLP
Houston

Amber Hoffman
Baker & McKenzie
Washington DC

Victoria Sherlock
KPMG LLP
Houston

Niles Elber
Caplin & Drysdale
Washington, DC

Kevin Johnson
Chamberlain Hrdlicka
Philadelphia

Andy Sliwa
Ceteris
Chicago

George Hani
Miller & Chevalier
Washington DC

Kevin Kenworthy
Miller & Chevalier
Washington DC

Patricia Sweeney
Miller & Chevalier
Washington, DC

Jonathan Prokup
Chamberlain Hrdlicka
Philadelphia

Not all speakers will appear at each location

Monday, Day One

8:00 am **Registration and Continental Breakfast**

8:45 am **Chairman's Welcome and Overview of the Workshop**

9:00 am **Overview of the Audit Process**

- IRS selection of audits and programs - LB&I and other divisions - quality examination program - random and CAP Audits - coordinated industry issue audits
- Audit notification - taxpayer response to audit notification - industry focus program and rules of engagement
- IRS examination team - composition - opening conference and subsequent meetings
- Procedural issues - statute of limitations extension requests - Information Exchange with foreign governments
- Information Document Requests (IDRs) and witness interviews - closing the audit

10:15 am **Break for Refreshments**

10:30 am **The Tier Issue Program**

- Description of tiers and how tiering affects case resolution - discretionary and mandatory IDRs - settlement authority
- Select tier 1 issues (active status): transfer of intangibles (buy ins/cost sharing), research credit claims, withholding payments to foreign persons, Sec. 199 deduction
- "Monitoring" status issues
- Resolving Tier 1 Issues -- strategy and methods

11:30 am **IRS Information Gathering: IDRs and Summonses**

- Use and importance of IDRs - document production best practices
- IDR Procedures – issuance - time frames - modification and extensions
- Identifying and responding to difficult IDRs – use of witness interviews
- IRS Summonses - description and importance – procedures and defenses

12:30 pm **LUNCHEON**

1:45 pm **The Use and Significance of Privileges**

- Types of and differences among privileges
- Elements and waiver rules for attorney client privilege, work product privilege and tax practitioner privilege
- Privilege issues in audits - protecting taxpayer information - protecting expert information
- Production of reserve workpapers - Textron, Deloitte and other privilege developments

3:00 pm **Break for Refreshments**

3:15 pm **Penalty Issues and the Economic Substance Statute**

- Types of taxpayer penalties and exam development of penalty issues
- Defenses to penalties
- Preparer Penalties under Section 6694 - Circular 230
- Economic Substance codification - basic elements and issues - penalty provisions

4:45 pm **Meeting Adjourns for the Day**

Tuesday, Day Two

8:00 am **Continental Breakfast**

8:30 am **Chairman's Overview of Day One**

8:45 am **Managing and Resolving IRS Transfer Pricing Controversies**

- The current transfer pricing enforcement environment
- Who handles the audit? IDRs from the IRS economist; dealing with the International Examiner (IE); dealing with IRS counsel
- Resolution strategies for exam-level settlements: fast track mediation, early referral and accelerated issue resolution (AIR) procedures
- Advance pricing agreements – initiating simultaneous appeals and competent authority proceedings
- Using an economist to support your position

10:15 am **Break for Refreshments**

10:30 am **Closing an IRS Exam**

- IRS "No Change" letter
- Reviewing the IRS' Notice of Proposed Adjustment and RAR - rights and strategy
- Responding to the Statutory Notice of Deficiency ("90 Day Letter") - rights and strategy
- Closing Agreements – review of terms and conditions
- Offers in compromise

11:30 am **Alternatives to Litigation - Procedures and Strategies**

- Preparing for the Appeals Conference - Early Referral Program (single issues) and Pre-Petition Appeals (all issues)
- Drafting a protest for appeals – attending the appeals conference
- Using fast track (Mediation) appeals - post petition proceedings

12:15 pm **LUNCHEON**

1:15 pm **Litigation Forums and Key Procedures**

- Selecting the best forum: Federal District Court, Court of Claims or Tax Court
- Considerations in choosing the best forum: ability to pay the proposed tax, choice of law, Judges procedural differences (depositions, juries)
- Key aspects of Tax Court litigation – Petition, stipulation process, discovery procedures, burden of proof
- Trial setting, timing, and use of experts

2:15 pm **Break for Refreshments**

2:30 pm **Interrelationships of IRS Audits with Financial Statement Preparation**

- Disclosure of IRS audit results in financial statements
- Determining FIN 48 disclosure - determining the amount of Recognized Tax Positions
- Preparation of Schedule UTP for Uncertain Tax Positions – current status on implementation – planning issues
- Accruing interest and penalties on tax underpayments

3:30 pm **Current Controversy Developments and Hot Topics**

4:30 pm **Conference Concludes**

Time/topics subject to change
© Copyright 2011 CITE

Conference Center Location:

▲ Washington D.C. ▲
Miller & Chevalier Law Offices
655 15th St NW # 900
Washington D.C., DC 20005-5799
(202) 626-5800

Hotel Accommodations:

CITE's block of discounted sleeping rooms is limited - reserve your sleeping room early! We cannot guarantee rates or availability. A very limited block of rooms at a reduced rate has been set aside for CITE attendees.

▲ Houston ▲

The Houstonian Hotel
Tel (713) 680-2626
or (800) 231-2759
111 North Post Oak Lane
Houston, TX. 77024
reservations@houstonian.com
Limited time reduced
CITE rate: \$199.00 per night

Please contact the appropriate hotel and mention that you are attending the course listed under CITE. The CITE rate will be available up to approximately 30 days prior to the meeting or until the group block is sold-out, whichever comes first so make your reservation as soon as possible. Your sleeping room is not included in the registration fee.

Conference Sponsor:

CETERIS

Educational Course Credit:

CITE is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN, 37219-2417. Web site: www.nasba.org

CITE is an approved sponsor (# 702) of CPE courses for enrolled agents.

For information on CITE's hardship and financial aid policy, please contact us or visit our website. www.citeusa.org This basic to intermediate level program is transitional and non-transitional which is appropriate for both newly admitted attorneys and experienced attorneys.

Resolving IRS Tax Controversies

How to Prepare for Audits and Appeals, Resolve IRS Disputes, Mitigate Penalties and Understand Alternative Dispute Resolution Methods

**New from
CITE in
2011!**

**Washington, DC • October 24 & 25, 2011
Miller & Chevalier Law Offices**

**Houston • November 7 & 8, 2011
The Houstonian Hotel**

Earn up to 16 CPE/CLE Credits

Why You Should Attend:

In today's economic environment, the IRS will be closely scrutinizing U.S. tax returns to look for ways to increase taxes and reduce refund claims. The IRS has already announced that they are increasing examinations of U.S. companies and identified key areas where they are focusing their efforts. In addition, many companies are looking at ways to reduce their tax liability or carrying back losses to claim tax refunds.

For 2011, CITE announces a new, comprehensive course on IRS tax audits and controversies for corporate tax practitioners. Let our experienced faculty of tax professionals help remove the mystery surrounding the IRS audit process. Find out what the IRS is looking for on audit and the latest tools available to reduce or mitigate IRS adjustments and penalties. Topics include a review of Tier 1 and other specific issues in the domestic and international tax context, including Sec.199, U.S. withholding taxes, transfer pricing and research tax credit.

In addition to understanding the IRS audit process, attendees will receive practical insights into how to respond to IRS IDRs and negotiate adjustments. The course includes an update on recent developments affecting the attorney-client privilege and work product doctrine.

Our faculty can handle your toughest IRS tax audit questions, including disclosure of foreign bank accounts, capitalization of expenses attributable to manufacturing, distribution or acquisition activities, and dealing with specialized agents in depreciation and pension-related issues.

Read through our schedule and let us know who at your company or firm will benefit most by attending. **REGISTER TODAY and save with our Early-Bird Discount!**

Who Should Attend:

This course is designed for corporate tax directors and managers, tax counsel and accountants, as well as, CPAs, attorneys and enrolled agents involved in representing their clients before the IRS. A working knowledge of the U.S. tax law is recommended, but there are no prerequisites for this course.

Substitutions/Cancellations: Cancellations received more than 72 business hours prior to the meeting will be issued a credit. A \$350 fee will apply to cancellations received within 72 business hours of the event. No credit card or cash refunds will be issued at any time. For more information regarding administrative policies, such as complaints and refunds, please contact us at 1-914-328-5656, or e-mail info@citeusa.org Credits will not be issued for "no shows"

**REGISTER TODAY & Save \$200
with Our Early-Bird Discount!**

Web: www.citeusa.org

Phone: (914)328-5656

Fax: (914)328-5757

Resolving IRS Tax Controversies

Fee includes: Continental breakfasts, two lunches, refreshment breaks, and documentation binder.

Name _____

Title _____

Organization _____

Address _____

City _____ State _____ Zip _____

Tel. () _____ Fax () _____

E-mail _____

2 Locations to Choose From:

- Washington, DC, Oct 24 & 25 Houston, Nov 7 & 8

Save \$200 Register Early!

Web: www.citeusa.org

E-mail: info@citeusa.org

Fax: (914)328-5757

Mail: CITE, P.O. Box 1012, White Plains, NY 10602

Registration Fee: Payment is due on or prior to the meeting

- \$1,295** Early Registration (payment up to 1 month prior to course)
 \$1,495 Registration (payment within 1 month of course)
 \$100 Discount for CITE Members ID# _____
 To order materials from this conference, please see our website www.citeusa.org

Method of Payment: Checks must be made in U.S. dollars on a U.S. bank.

- Check enclosed payable to CITE (T.I.N. #14-1716897)
 Credit card payment: Mastercard Visa AmEx Discover

Card No. _____

V:Code (required) _____ Billing Zip _____

Card exp. ____ / ____ Signature _____

Contact CITE about Special Discounts for more than three attendees from the same company.



CITE

Council for International Tax Education
P.O. Box 1012
White Plains, NY 10602

Resolving IRS Tax Controversies

BNA/CITE Announces a New Conference Series on

How to Prepare for Audits and Appeals, Resolve IRS Disputes, Mitigate Penalties and Understand Alternative Dispute Resolution Methods

Washington, DC • October 24 & 25, 2011 • Miller & Chevalier Law Offices
Houston • November 7 & 8, 2011 • The Houstonian Hotel

Conference Sponsor: CETERIS

New
from
CITE in
2011!

