



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 2010!**

New York • April 19 & 20, 2010
KPMG's Heritage Center

Dallas • May 3 & 4, 2010
Gardere Wynne Sewell Conference Center

Washington DC • June 7 & 8, 2010
BNA Conference Center

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

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with Our Early-Bird Discount!**

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Dewey & LeBoeuf LLP, Washington DC

David Bowen

Grant Thornton LLP, Washington, DC

Jennifer Breen

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Linda Stiff

PricewaterhouseCoopers LLP, Washington, DC

Mark Weisz

Liz Claiborne, Inc., North Bergen, NJ

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 **Understanding the Audit Process**

- IRS selection for audit- normal recurring, large case taxpayer, random audit, coordinated industry issue
- IRS audit notification - first contact, phone call, audit letter
- Initial response to audit contact; Form 2848 - Power of Attorney and Declaration of Representative
- Opening conference with IRS audit team – scope of examination
- Industry issue focus program and Rules of Engagement
- Conduct of examination – responding to and managing Information Document Requests (IDRs)

10:15 am **Break for Refreshments**

10:30 am **Impact of an IRS Controversy on Financial Statements**

- Financial statement footnotes disclosures
- Fin 48 impact
- Impact on valuation allowances
- Treatment of deficiency and refund interest
- Communication with the audit committee
- Communication with financial analysts

11:15 am **The Tier Issue Program: What You Can Expect at Exam and Appeals**

- Tiering of issues – what is it and how does it affect case resolution?
- Common Tier 1 Issues (Deduction for Section 199 domestic production activities, research tax credit)
- Responding to "canned" IDRs
- Role of the technical advisor
- Is fast track a viable option?
- Appeals consideration
- Penalty considerations

12:15 pm **LUNCHEON**

1:30 pm **Latest Attorney-Client Privilege and Work Product Developments**

- Attorney-client and work product
- Breadth and limitations of Sec. 7525
- Waiver Issues
- Recent decisions -Textron update on Valero, Regions Bank and Countryside decisions

3:00 pm **Break for Refreshments**

3:15 pm **Closing an IRS Exam and Beyond**

- Managing the NOPA process
- Closing the audit agreed or un-agreed
- Protest or petition?
- Appeals: a plethora of processes
- Effective advocacy at the appeals office

4:15 pm **To Litigate or Not - Considerations**

- Choosing the proper forum – Tax Court, U.S. District Court or Court of Claims
- Understanding tax court process
- Procedural and discovery issues

5:15 pm **Conference Adjourns for the Day**

Tuesday, Day Two

8:00 am **Continental Breakfast**

8:30 am **Review of Day One and Preview of Day Two**

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

10:00 am **Break for Refreshments**

10:15 am **Alternative Dispute Resolution Methods**

- Fast track settlement
- Post appeals mediation
- Post appeals arbitration
- Pre-filing agreements – pre exam issues
- Compliance Assurance Process (CAP Program)

11:15 am **Application of Penalties and Handling Penalty IDRs**

- IRS penalties that must be considered on all exams
- Penalty issues that develop as exam progresses – Foreign Bank Account Reports (FBAR) and IRS Voluntary Disclosure proceedings
- Listed transaction, valuation, accuracy and negligence issues
- Preparer penalties under Section 6694 & Circular 230 and OPR

12:15 pm **LUNCHEON**

1:30 pm **IRS Hot Topic: Withholding on Payments to Foreign Persons**

- Recent IRS activity
- Understanding the withholding requirements
- Remediation of compliance failures
- The IRS exam methodology

2:45 pm **Break for Refreshments**

3:00 pm **Understanding Exchange of Information and Its Use in IRS and Foreign-Initiated Audits**

- Legal standards for Exchange of Information
- What and how information can be exchanged between tax authorities
- Responding to an Exchange of Information request
- Privilege and Exchange of Information
- FOIA and foreign-initiated requests for information
- Joint International Tax Shelter Information Centre (JITSIC)

4:15 pm **Conference Concludes**

Time/topics subject to change
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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 nontransitional which is appropriate for both newly admitted attorneys and experienced attorneys.

Hotel Accommodations:

▲ New York ▲

KPMG's Heritage Center
345 Park Ave
New York, NY 10154
Tel: 212-954-7527
Recommended Hotels:
Doubletree Metropolitan
569 Lexington Ave.
New York, NY 10122
Tel: 212-752-7000

Waldorf Astoria
100 E. 50th St.
New York, NY 10022
Tel: 212-355-3100

Marriott East Side
525 Lexington Ave.
New York, NY 10022
Tel: 212-755-4000

▲ Dallas, TX ▲

Gardere Wynne Sewell
Conference Center
1601 Elm St.
Dallas, TX 75201
Tel: 214-999-3000
Recommended Hotels:
Magnolia
1401 Commerce St.
Dallas, TX 75201
Tel: 214-915-6500

Fairmont Dallas Hotel
1717 Akard St.
Dallas, TX 75201
Tel: 214-720-2020

Adolphus Hotel
1321 Commerce St.
Dallas, TX 75202
Tel: 214-377-6031

▲ Washington, DC ▲

BNA's Conference Center
1801 S. Bell St.
Arlington, VA 22202
Tel: 800-372-1033

Recommended Hotels:
Hyatt Regency Crystal City
Reagan National Airport
2799 Jefferson Davis Highway
Arlington, VA 22202
Tel: 703-413-6789

Radisson Hotel
Reagan National Airport
2020 Jefferson Davis Highway
Arlington, VA 22202
Tel: 702-920-8600

Hampton Inn & Suites
Reagan National Airport
2000 Jefferson Davis Highway
Arlington, VA 22202
Tel: 702-418-8181

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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 2010, 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"

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

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3 Locations to Choose From:

- New York, April 19 & 20
- Dallas, May 3 & 4
- Washington DC, June 7 & 8

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

- \$1,195** Early Registration (payment up to 1 month prior to course)
- \$1,395** 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)
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Contact CITE about Special Discounts for more than three attendees from the same company.



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