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 Corporate Taxpayers (2014); Dealing with New Challenges Facing Large Corporate Audits
10:30 a.m.

10:30 a.m. - Coffee Break
10:45 a.m.

10:45 a.m. - Compliance Assurance Process -- Navigating Recent and Pending Developments in CAP Audits
11:15 a.m.

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 --
(Apppeals 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; 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
<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:30 a.m.</td>
<td>Coffee and Danish</td>
</tr>
<tr>
<td>9:00 a.m.</td>
<td>Guest Speaker -- (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.</td>
</tr>
<tr>
<td>10:00 a.m.</td>
<td>Guest Speaker --</td>
</tr>
<tr>
<td>10:00 a.m.</td>
<td>Hot Audit Issues -- Responding to</td>
</tr>
<tr>
<td>10:30 a.m.</td>
<td>Pre-Seminar Topics Raised by Attendees</td>
</tr>
<tr>
<td>10:45 a.m.</td>
<td>Coffee Break</td>
</tr>
<tr>
<td>10:45 a.m.</td>
<td>Recent Developments in Partnership Tax Audits; FATCA Launch and Its Implications</td>
</tr>
<tr>
<td>11:15 a.m.</td>
<td>Guest Speaker --</td>
</tr>
<tr>
<td>11:15 a.m.</td>
<td>Current Developments in Computing Interest on Refunds and Deficiencies; Interest Netting after Corporate Reorganizations</td>
</tr>
<tr>
<td>11:45 a.m.</td>
<td>Use of Experts in Fast Track and at Appeals; Developments in Work-Product Doctrine and Attorney-Client Privilege Issues</td>
</tr>
<tr>
<td>12:15 p.m.</td>
<td>Concluding Remarks</td>
</tr>
</tbody>
</table>