


## 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

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- 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