MANAGING TAX AUDITS AND APPEALS – 2015

Day 1: Thursday, October 1, 2015 (DC)/October 8, 2015 (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 (2015); Recent Developments in Large Case Audits including IRS Proposals for Issue-Focused Audits
10:30 a.m.

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

10:45 a.m.  -  OECD Base Erosion and Profit Shifting Proposals (BEPS); European Commission Investigates Tax Rulings; How Changes Abroad May Affect Your Transfer Pricing Audits at Home
12:00 noon

12:00 noon  -  Luncheon Guest Speaker -- (Large Business and International Division, Internal Revenue Service)
Large Case Audits; Compliance Assurance Process; Pre-Filing Agreement; Fast Track Procedures; Enforcement Initiatives; Accelerated Issue Resolution Programs; Issued Focused Audits, etc.
2:00 p.m.

2:00 p.m.  -  Dealing with State and Local Tax Audits;
2:45 p.m.  -  Current State Tax Audit Developments;
Filing Claims for Refund in State Tax Audits;
Unclaimed Property Audits
2:45 p.m. - Audits Developments Relating to
Changes in Methods of Accounting;
Tactical Approaches When the IRS Argues
For a Change in Method of Accounting

3:15 p.m. - Coffee Break

3:30 p.m.

3:30 p.m. - Guest Speaker --

4:00 p.m. - Legislative and Administrative Proposals
Impacting the Exam and Appeals Process

4:00 p.m. - Developments in Work-Product Doctrine and
4:30 p.m. - Attorney-Client Privilege Issues

4:30 p.m. - Dealing With Partnership Audits;
5:00 p.m. - IRS Plans to Increase Partnership Audits;
Dealing with TEFRA; Administrative
Adjustment Requests

5:00 p.m. - Adjournment

5:15 p.m. - Crowell & Moring LLP Reception
Day 2, Friday, October 2, 2015 (DC)/October 9, 2015 (SF)

<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
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<tbody>
<tr>
<td>8:30 a.m.</td>
<td>Coffee and Danish</td>
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<tr>
<td>9:00 a.m.</td>
<td>Fast Track and Appeals; Navigating the Appeals Judicial Approach and Culture Rules; When and How to Use an Expert; Appeals and Valuation Cases</td>
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<td>10:00 a.m.</td>
<td>Hot Audit Issues – Reliance on Opinions and Studies By Outside Experts; Parallel Employment and Income Tax Audits; Responding to Questions Raised by Seminar Participants</td>
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<td>11:00 a.m.</td>
<td>Coffee Break</td>
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<td>11:15 a.m.</td>
<td>Employee Benefits and Executive Compensation Issues</td>
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<td>11:45 a.m.</td>
<td>Guest Speaker -- Current Developments in Computing Interest on Refunds and Deficiencies; Interest Netting Issues</td>
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<td>12:15 p.m.</td>
<td>Concluding Remarks</td>
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