



MAYER • BROWN

# Tax Controversy Seminar

Friday, September 26, 2014  
8:30 a.m. – 4:00 p.m.

Biltmore Hotel  
2151 Laurelwood Road  
Santa Clara, CA

This comprehensive, one-day Tax Controversy Seminar will cover practical strategies for resolving disputes in Audit and Appeals in the context of new IRS initiatives, including:

- New LB&I Enforcement Priorities, Ethical Issues, and Financial Reporting
- Managing Compliance, Documentation and Witness Interviews
- Mock IRS Audit on a Transfer Pricing Issue
- How to Prepare for IRS Appeals
- Responding to US and OECD (BEPS) Proposals
- Tax Litigation Update: What You Should Know about Emerging Administrative Law Issues

Our keynote lunch speaker will be Jarnail Dhatt, IRS Appeals Area Director, who will describe the new Appeals Judicial Approach & Culture (AJAC). AJAC has changed the rules of engagement for both taxpayers and exam teams. Mr. Dhatt will explain how taxpayers should run an exam in order to be ready in the event an issue goes to Appeals.

Agenda

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## AGENDA

TIME	TOPIC	SPEAKERS
8:30 a.m. – 8:50 a.m.	<b>CONTINENTAL BREAKFAST</b>	
8:50 a.m. – 9:00 a.m.	<b>Welcome and Introduction</b>	<b>Don Blach</b> , Symantec <b>Paul DiSangro</b> , Mayer Brown (Palo Alto) <b>John Forry</b> , USD Law School of Law
9:00 a.m. – 9:50 a.m.	LB&I's New Enforcement Priorities, Ethical Issues, & Financial Reporting in Tax Controversies	<b>Larry Langdon</b> , Mayer Brown (Palo Alto) <b>Tony Rebelo</b> , Ernst & Young (San Jose)
9:50 a.m. – 10:00 a.m.	<b>BREAK</b>	
10:00 a.m. – 10:50 a.m.	Increased Field Investigations: Managing Compliance, Documentation, and Witness Interviews	<b>Barry Slivinsky</b> , Adobe Systems <b>Paul DiSangro</b> , Mayer Brown (Palo Alto)
10:50 a.m. – 11:00 a.m.	<b>BREAK</b>	
11:00 a.m. – 11:50 a.m.	Mock IRS Audit on a Transfer Pricing Issue	<b>Sunny Williams</b> , Agilent Technologies <b>Cabell Chinnis</b> , Mayer Brown (Palo Alto) <b>Mark Hoose</b> , Phillips 66
11:50 a.m. – 12:00 Noon	<b>BREAK</b>	
12:00 Noon – 1:00 p.m.	<b>Lunch &amp; Keynote Address:</b> How to Run an Exam to Be Ready for Appeals	<b>Jarnail Dhatt</b> , IRS Appeals Area Director
1:00 p.m. – 1:50 p.m.	IRS Appeals: How to Position Your Case	<b>Cabell Chinnis</b> , Mayer Brown (Palo Alto)
1:50 p.m. – 2:00 p.m.	<b>BREAK</b>	
2:00 p.m. – 2:50 p.m.	Responding to US and OECD (BEPS) Proposals	<b>Jason Osborn</b> , Mayer Brown (Washington, DC) <b>John Forry</b> , USD School of Law
2:50 p.m. – 3:00 p.m.	<b>BREAK</b>	
3:00 p.m. – 3:50 p.m.	Tax Litigation Update: What You Should Know about Emerging Administrative Law Issues	<b>Tom Kittle-Kamp</b> , Mayer Brown (Chicago) <b>Paul Morgan</b> , Altera Corp.
3:50 p.m. – 4:00 p.m.	<b>Wrap-Up &amp; Summary</b>	<b>Don Blach</b> , Symantec <b>Paul DiSangro</b> , Mayer Brown (Palo Alto) <b>John Forry</b> , USD Law School of Law