Day One (Thursday)

9:30 - noon

Civil Workshop: Responding to Summons

Your client has received a summons. Now what? This panel of practitioners and judges will address the basic issues of how to comply with a summons, how to prepare a taxpayer or a return preparer for an IRS interview, who may and should attend the interview, what objections may be made before and during the interview, and the differences between summons compliance and a civil deposition, and litigation issues.

Moderator: Frank Agostino
Speakers:

Criminal Workshop

Moderators: Sandra Brown and Caroline Ciraolo
Speakers: Aimee Schabillion
Sara Neill
Ian Comisky
Marty Schainbaum
Richard Speier

noon-1:30 First time Attendees / Old-Timer Welcomers Lunch

12:15-2:15 Low Income Taxpayers program:

Innocent Spouse: Proving Abuse
Representing a spouse who has been the subject of mental or physical abuse presents unique challenges. The issues may arise in asserting an innocent spouse at examination, trial or collection. There may be issues as to whether the abused spouse signed a tax return or engaged in financial transactions under duress. This panel will identify these issues, and discuss how to work with experts to protect these vulnerable taxpayers.

Moderator: Frank Agostino
Speakers:

2-2:15 Welcome / Opening Remarks

2:15-3:30 Plenary

Wisdom Across the Generations: How to Address Ethical Challenges in Tax Practice
Learn how very seasoned tax controversy specialists and their almost as experienced children view and deal with ethical issues which seem to repeat themselves over time. It’s a Family Feud!

Moderator: Scott Michel
Speakers: Caryn Marks Finley
Bernard Mark
Alexander P. Robbins
Edward Robbins Jr.
Hon. Juan Vasquez
Juan Vasquez Jr.
Jeffrey Neiman
Jan Neiman

3:30-3:45 Break

3:45-4:45 Civil Enforcement Priorities

Learn the top civil enforcement priorities and challenges – from LB&I campaigns to SBSE initiatives and DOJ priorities. Hear the views from the inside and be ready.

Moderator: Barbara Kaplan
Speakers: Drita Tonuzi
Steve Miller
R. Scott Clarke

Department of Justice Roundtable

The Swiss Bank Program is (almost) over and many non-compliant taxpayers have been brought to justice. Find out what is of concern to the DOJ Tax Division now.

Moderator: James A. Bruton III
Speakers: Richard Zuckerman
Paula Junghans
Tom Zehnle

4:45-5:35 With All Deference: What Standard Should The Court Apply To Tax Regulations

This panel will explore the standards utilized by the courts to decide the validity of Treasury Regulations and provide guidance as to when the court will and when the court will not uphold government regulations. The panel will address the continued vitality of the Chevron doctrine and its application to Treasury regulations.

Moderator:
Speakers: Hon. Mark Holmes
Gilbert Rothenberg
Lavar Taylor

IRS CI Roundtable

Find out what is new at the IRS Criminal Investigation Division – from undercover operations to enforce FATCA to new strategies to combat tax crimes.

Moderator:  Mark E. Matthews
Speakers:    Don Fort
            Victor Song
            Richard Lunger

6:30  Women’s Reception – Ferraro’s (likely will move to Friday)

8:00  Dinner – Ferraro’s

10:00 pm  Agostino Sponsored Event (may move to Friday)
Day Two (Friday)

9-10:15 Ethical and Other Issues When Representing Non-Compliant Taxpayers: Domestic and Foreign Voluntary Disclosures In a Post-Program World

The formal Offshore Voluntary Disclosure Program ended on September 28, 2018. Join a panel of civil and criminal tax experts who will address life after the OVDP, and ethical considerations for how to deal with domestic and foreign disclosures.

Moderator: Larry Campagna
Speakers: Eric Green
          Dennis Perez
          Daniel Price
          Bruce Zagaris

10:15-11:15 IRS Collection: More Than Money At Stake

The world of IRS collection has changed, including the real and present danger of your client losing his or her passport. Join a panel of experts exploring cutting edge collection issues.

Moderator: Robert E. McKenzie
Speakers: Nina E. Olson
          Bob Pope
          Larry Sannicandro

Criminal Prosecution of Employment Tax Cases

Employment taxes account for a large part of the “tax gap” and the IRS is focused on this area. Find out where the government is looking and how to defend against these criminal prosecutions.

Moderator: Josh Ungerman
Speakers: Michelle Schwerin
          Ben Thompkins
          Loren Washburn

11:15-11:30 Break

11:30-12:30 How to Persuade: Tips on Trial Practice Techniques

Find out from seasoned practitioners and Judges how to make your points at trial. Learn what will and will not work in before the Court.

Moderator: Kathleen Pakenham
Speakers: Frank Jackson
Hon. Maurice B. Foley
Hon. Tamara W. Ashford

Must Do Motions: A Check List for Criminal Cases

Is it all about the trial, or the pre-trial motions that you must consider in any criminal tax case. From Dahlstron to severance, to venue and jury waivers, find out what works and what will put your client in the best possible position for a win. Also hear the Government’s view!

Moderator: Charles Mueller
Speakers: Mark Daly
Peter Hardy
Patricia Pileggi

12:30-1:30 Jerry Feffer Annual Lunch

1:30-3:00 What Tax Controversy Lawyers Should Know About The Tax Cuts and Jobs Act

The TCJA presents many challenges to the IRS, and opportunities and pitfalls for taxpayers and their tax professionals. Look into the crystal ball with these tax experts and get prepared for what is to come.

Moderator: Frank Agostino
Speakers: Nancy Chassman
Charles Hodges II
Matthew Lerner
Jennifer Breen
Dean Zerbe

Criminal Trial Practice / Ask the Experts

The most difficult topics faced by criminal defense tax practitioners will be discussed. Bring your questions and find out if someone has a solution.

Moderator: Justin Thornton
Speakers: Nanette Davis
Charles Meadows
Jay Nanavati
(speakers to be added)

3-3:15 Break
3:15-4:15 Litigating Foreign-Related Penalties

After years of virtually sitting dormant in the Internal Revenue Code and Title 31, the IRS has found a new enthusiasm for asserting penalties regarding foreign information reporting, including the FBAR penalty. Join a panel of experts who will be examining recent procedural and substantive developments on the challenges faced by practitioners and taxpayers when the civil penalties are not resolved by the IRS.

Moderator: Richard Sapinski
Speakers: Tom Sawyer
          John Colvin
          Zhanna Ziering

How to Protect Your Client’s Civil Tax Interests When Agreeing To A Criminal Plea / collateral consequences

A plea in a criminal tax case can trigger many collateral consequences to a taxpayer and to a taxpayer’s spouse. These experts will let you know where the minefields are and how to avoid them.

Moderator: Steven Walker
Speakers: Sandy Boxerman
          Sharyn Fisk
          Karen Hawkins

4:15-5:15 Your Case in the News: How the Government and Taxpayers Work With the Media

What do you do with a case that is or will be high profile? How do you deal with the press and publicity specialists? What messages do you want out in the public? What are the ethical limitations? Hear a lively discussion on these topics.

Moderator: Bryan Skarlatos
Speakers: Nathan Richman
          Lee Sheppard
          David Voreacos

Sections 371 and 7212(a) – Life After Marinello

The United States Supreme Court in United States v. Marinello substantially curtailed the use of IRC Section 7212(a) in criminal tax prosecutions. The panel, including those involved in the Marinello litigation, will discuss the implications of Marinell and what is left of IRC Section 7212(a) for tax enforcement.
Moderator: Armando Gomez
Speakers: Geoffrey Davis
           Jennifer Johnson
           Richard Lunger
           Robert Lyons

5:15-6:30  Section Reception
Day Three (Saturday)

9-11:30  What Everyone Needs To Know About Cryptocurrency:

Part One:  Tax Treatment of Cryptocurrency Transactions

Part Two:  Enforcement When Cryptocurrency Transactions Go Wrong

Cryptocurrency has dominated the concern of all government regulators, including the Internal Revenue Service. These panelists will discuss the income tax consequences of owning, trading and investing in cryptocurrency and enforcement issues facing the IRS, as well as enforcement under the Bank Secrecy Act (BSA).

Moderator:  Steven Toscher
Speakers:  Guinevere Moore
           Kevin Sweeney
           J. Allen Kosowsky
           Nathan Hochman
           Betty Williams