

Thursday

12:00PM – 5:00PM

Tax Bridge to Practice

Sponsored by: Young Lawyers Forum and Diversity.

Program Co-Chairs: Kelley C. Miller, Reed Smith LLP, Washington, DC; Cathy Fung, Office of Chief Counsel (Large Business & International), IRS, Washington, DC

- 12:00pm** **A Conversation with.** (NO CLE) An esteemed member of the Tax Section sits down for an in-depth discussion of her practice, her history, and the latest developments in tax law.
- 12:45pm** **A Renewed Focus on CoGS.** The exception for Costs of Goods Sold (CoGS) from the new Base Erosion and Anti-Avoidance Tax (BEAT) has brought a renewed interest in understanding the contours of this tax accounting concept. This panel will provide a review of BEAT, section 263A, and CoGS with focus on the mechanics of section 263A (the Uniform Capitalization rules). The panelists also will address the relevant administrative guidance, case law, and the applicability of CoGS to BEAT.
Moderator: Anne Gordon, PwC, Washington, DC
Panelists: Wendy Tsao Friese, Deloitte, Washington, DC (Invited); Natasha Mulleneaux, Attorney, Office of Associate Chief Counsel (Income Tax & Accounting), Washington, DC (Invited); Additional Panelist TBD
- 1:45pm** **Crypto-Currency: Disclosure & Audits, What to Do and How to Handle.**
Panelists: Kelley C. Miller, Reed Smith LLP, Washington, DC; James P. Beatty, Attorney, Office of Associate Chief Counsel (Income Tax & Accounting), Washington, DC (Invited); Bridget E. Tombul, Branch Chief, Office of Associate Chief Counsel (Income Tax & Accounting), Washington, DC (Invited)
- 2:45pm** **Break.** (No CLE)
- 3:00pm** **The Ins and Outs of Litigating Penalties.**
Panelists: Kelley C. Miller, Reed Smith LLP, Washington, DC; Lawrence A. Sannicandro; McCarter English, Newark, NJ; Additional Panelists TBD
- 4:00pm** **Where's My Refund? An Overview of Joint Committee Review of Tax Refunds.** This panel explores the role of the Joint Committee on Taxation ("JCT") with respect to taxpayer claims for refund. Aside from its important work in advising members of Congress, the JCT also has a statutorily mandated role in reviewing certain large refund claims by taxpayers. Panelists from private practice and government will shed some light on how cases are referred to the JCT, and how the JCT conducts its review.
Panelists: Kandyce Korotky, Covington & Burling LLP, Washington, DC; Mary Slonina, PwC, Washington, DC; Shamik Trivedi, Grant Thornton LLP, Washington, DC; Additional Panelists TBD