

Thursday

12:00PM – 6:15PM

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 TBD.** (NO CLE) TBD sits down for an in-depth discussion of her practice, her history, and the latest developments in tax law.
- 1:00pm**      **The Wonder Years: Navigating the Early Years of Practicing Tax Law.** (NO CLE) A panel of junior and mid-level attorneys will provide their viewpoints on their profession during the early stages of their practice. The panelists will discuss their experiences in law firms, accounting firms, clerkships, government, and low-income taxpayer clinics.  
Moderator: Cathy Fung, Office of Chief Counsel (Large Business & International), IRS, Washington, DC  
Panelists: TBD
- 1:45pm**      **What Should I Know About Employee Benefits in My Tax Practice?** This panel will provide an overview of essential employee benefit issues for all tax attorneys, including issues revolving around employment-based retirement plans, health care plans, and executive compensation arrangements. The panelists will also discuss the latest developments in employee benefits.  
Moderator: TBD  
Panelists: Milan H. Kim, Senior Attorney, Office of Chief Counsel (Tax Exempt and Government Entities Division Counsel), IRS, Dallas, TX; Additional Panelists TBD
- 2:45pm**      **Break.** (No CLE)
- 3:00pm**      **Private Equity: Key US Tax Considerations.** The panel will provide an overview of key commercial objectives and US Federal income tax considerations relevant to private equity funds. The panel will highlight the different sensitivities relevant to various categories of investors and discuss how a “typical” private equity fund structure addresses these sensitivities. The panelists will walk-through the life cycle of a portfolio investment and illustrate how tax considerations impact the overall economics of the investment. The discussion will provide an introductory framework of tax rules applicable to private equity. No prior knowledge of or experience with private equity is necessary.  
Panelists: Amit M. Sachdeva, EY, Houston, TX; Alfred Bae, EY, Houston, TX
- 4:00pm**      **Cross-Border Tax Issues When Operating in Mexico.** This panel will discuss selected issues that arise when multinational entities conduct business in Mexico. Panel topics include common Mexican business formations, the U.S.-Mexico tax treaty, multilateral instruments, the Manufacturing, Maquila, and Service Industry program, and transfer pricing considerations.  
Moderator: Brandon King, Attorney-Adviser for the Honorable Albert G. Lauber, US Tax Court, Washington, DC  
Panelists: TBD
- 5:00pm**      **Break.** (No CLE)
- 5:15pm**      **Tax Controversy and Litigation.** TBD.  
Moderator: Kelley C. Miller, Reed Smith, Washington, DC  
Panelists: TBD  
Co-Sponsored by: Court Procedure & Practice