

Thursday

6:00PM – 10:00PM

Administrative Practice Dinner (*Invitation Only*)

Friday

8:30AM – 11:30AM

Administrative Practice

Chair: Ronald Buch, Jr., McKee Nelson LLP, Washington, DC

- 8:30am** **Opening Remarks.**
- 8:35am** **Important Developments.** This panel will discuss important developments in administrative practice that have occurred since the last meeting.
Moderator: Kevin Johnson, Chamberlain Hrdlicka White Williams, Philadelphia, PA.
- 8:50am** **IRS Whistleblower Program.** A penalty flag on the field? Reviewing the new IRS whistleblower action in the big leagues. *Moderator:* Phillip Pillar, Greenberg Traurig LLP, Philadelphia, PA. *Panelists:* Stephen Whitlock, Director, Whistleblower Office, IRS, Washington, DC; Stephen Kesselman, Deputy Chief Counsel, Office of Chief Counsel, IRS, Washington, DC; Eli Dicker, Chief Tax Counsel, TEI, Washington, DC; Reuben Guttman, Grant & Eisenhofer LLP, Washington, DC; Dan Wiles, PriceWaterhouseCoopers LLP, Washington, DC.
- 9:40am** **Bankruptcy and Insolvency Effects on Examination and Collection.** The recent economic events will undoubtedly result in an increase in bankruptcy filings. Given that likelihood, now is a good time to review and consider the effect of bankruptcy and/or insolvency on tax issues both in determining the liability and dealing with outstanding liabilities. Understanding the benefits bankruptcy may offer as well as the pitfalls it can impose will assist you in representing clients in bad economic times. The panel will consider, among other issues, the effects of bankruptcy on the federal tax lien, the impact of bankruptcy for taxpayers under examination and the collection of taxes through the bankruptcy case. *Moderator:* Fred F. Murray, Grant Thornton LLP, Washington, DC. *Panelists:* Thomas R. Thomas, Division Counsel, SB/SE Division, IRS, Washington, DC; Fred Schindler, Director, IRS Collection Policy, IRS, Washington, DC; Professor T. Keith Fogg, Villanova Law School Federal Tax Clinic, Villanova University School of Law, Villanova, PA; Lawrence D. Garr, Dickstein Shapiro LLP, Washington, DC.
- 10:35am** **Disclosure and Penalty Protection for Taxpayers and Advisors.** This panel will review various penalty provisions in the Code, including the accuracy-related penalties under sections 6662 and 6662A, the reportable transaction penalties under sections 6707 and 6707A and the return preparer penalties under section 6694 and will discuss the circumstances in which the disclosure or reporting of a position can provide a defense to those penalties. *Moderator:* Corina Trainer, PriceWaterhouseCoopers LLP, Washington, DC. *Panelists:* Bryon Christensen, Attorney-Advisor, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC; Henry Schneiderman, Special Counsel, IRS Office of Chief Counsel, IRS, Washington, DC; Michael J. Desmond, McKee Nelson LLP, New York, NY.

Friday

12:30PM – 1:30PM

Administrative Practice and Court Procedure and Practice Luncheon (*Ticketed Event*)