

Saturday

2:00PM – 4:00PM

From Section 7122 to “Three and Out”: The Use of Settlement Initiatives and Litigation to Resolve Tax Shelters and Other IRS Enforcement Priorities

This program will explore the history of IRS settlement initiatives and the current “three and out” strategy of coordinating the Government’s litigation and settlement initiatives, an approach that is the result of over eight years of controversy over tax shelters. Our panel will explore how the “three and out” coordinated approach differs from past efforts to resolve disputes over particular tax shelter transactions and whether this approach signals how the Government may deal with other widespread compliance issues. Introductions and background will be presented by Rochelle Hodes.

MODERATORS: Julian Y. Kim, Latham & Watkins LLP, Washington, DC
Cary D. Pugh, Skadden Arps Slate Meagher & Flom LLP, Washington, DC

PANELISTS: Roland Barral, LMSB Area Counsel, IRS, New York, NY
Donald L. Korb, Chief Counsel, IRS, Washington, DC
Emily A. Parker, Thompson & Knight LLP, Dallas, TX
Christopher B. Sterner, LMSB Division Counsel, IRS, Washington, DC
M. Todd Welty, Sonnenschein Nath & Rosenthal LLP, Dallas, TX
B. John Williams, Skadden Arps Slate Meagher & Flom LLP, Washington, DC

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