KEYNOTE ADDRESS

William J. Wilkins, Esq.
Chief Counsel, Internal Revenue Service
Assistant General Counsel, U.S. Department of the Treasury

CONFERENCE CHAIRS

Bryan C. Skarlatos, Esq.
Partner, Kostelanetz & Fink, LLP

Diana L. Wollman, Esq.
Partner, Sullivan & Cromwell LLP
5TH ANNUAL TAX CONTROVERSY FORUM

JUNE 7, 2013

CROWNE PLAZA TIMES SQUARE MANHATTAN NEW YORK, NY

CO-CHAIRS
Bryan C. Skarlatos, Esq., Partner, Kostelanetz & Fink, LLP, New York, NY
Diana L. Wollman, Esq., Partner, Sullivan & Cromwell LLP, New York, NY

LEARNING OBJECTIVES
New York University School of Continuing and Professional Studies (NYU-SCPS) is pleased to present the 5th Annual Tax Controversy Forum. The Tax Controversy Forum brings together representatives from the government and expert private practitioners to compare perspectives on a wide range of topics involving federal tax audits, appeals, and litigation. The Forum covers a wide range of controversy work, from procedural seminars to substantive programs, international issues, ethical problems, current enforcement initiatives sensitive audits, and civil and criminal tax penalties. Enforcement is an essential part of our federal tax system. The Tax Controversy Forum is an opportunity to stay current on new developments as well as to exchange ideas and share practice tips, which can contribute to better functioning of the system. Participants qualify for CPE and CLE credits.

As a premier educational institution, NYU-SCPS is committed to providing the highest standard of professional enrichment.

WHO SHOULD ATTEND?
Accountants, attorneys and tax professionals at all levels who prepare for or handle audits, appeals or tax litigation, as well as those involved in planning and transactional work who could benefit from a better understanding of the implications of their work for audit defense.

NYU SCHOOL OF CONTINUING AND PROFESSIONAL STUDIES
(NYU-SCPS)
Dennis Di Lorenzo, B.A., Interim Dean and Vice Dean
Rosemary A. Mathewson, J.D., LL.M., Vice Dean, Global and Strategic Initiatives; Divisional Dean, Programs in Business

DIVISION OF PROGRAMS IN BUSINESS
Renee Harris, M.S., Assistant Dean and Academic Director, Division of Programs in Business

DEPARTMENT OF FINANCE, LAW, AND TAXATION
Kathleen Costello, CMP, Assistant Director
PLANNING COMMITTEE

PLANNING COMMITTEE CHAIR
Sidney Kess, CPA, J.D., LL.M., Of Counsel, Kostelanetz & Fink, LLP, New York, NY

PLANNING COMMITTEE MEMBERS
David D. Aughtry, Esq., Shareholder, Chamberlain, Hrdlicka, White, Williams & Aughtry, Atlanta, GA
Howard J. Berman, Esq., Director, IRS Tax Controversy Practice, Deloitte Tax LLP, New York, NY
Sandra R. Brown, Esq., LL.M., Assistant United States Attorney, Chief, Tax Division, The United States Attorney’s Office, Central District of California, Los Angeles, CA
Nancy Chassman, Esq., Global Director of Tax Controversy, American International Group, Inc., London, UK
N. Jerold Cohen, Esq., Partner, Sutherland Asbill & Brennan LLP, Atlanta, GA
Michael J. Desmond, Esq., The Law Offices of Michael J. Desmond, APC, Washington, DC
Eli J. Dicker, Esq., Executive Director, Tax Executives Institute, Inc., Washington, DC
John Gamino, CPA, Esq., Assistant Professor, McCoy College of Business Administration, Texas State University, Dallas, TX
Gersham Goldstein, Esq., Stoel Rives LLP, Portland, OR
Donald L. Korb, Esq., Partner, Sullivan & Cromwell LLP, Washington, DC
Matthew Magnone, Esq., Senior Manager, Tax Controversy and Risk Management Services, Ernst & Young LLP, New York, NY
Robert E. McKenzie, Esq., Partner, Arnstein & Lehr LLP, Chicago, IL
Charles J. Muller, III, Esq., Shareholder, Chamberlain, Hrdlicka, White, Williams & Aughtry, San Antonio, TX
Pamela F. Olson, Esq., Deputy Tax Leader and Washington Tax Services Practice Leader, PricewaterhouseCoopers LLP, Washington, DC
Walter Pagano, CPA, CFE, CFF, Partner, Tax Controversy Practice Leader, Forensic Accountant and Litigation Consultant, EisnerAmper LLP, New York, NY
Kathleen M. Pakenham, Esq., Partner, Cooley LLP, New York, NY
Jeremy H. Temkin, Esq., Principal, Morvillo Abramowitz Grand Iason & Anello P.C., New York, NY
Carolyn Reed Turnbull, CPA, MST, Tax Director, McGladrey LLP, Orlando, FL
Christopher S. Rizek, Esq., Member, Caplin & Drysdale, Chartered, Washington, DC

For more information, call (212) 992-3320. Register online at scps.nyu.edu/taxcontroversy
5th Annual Tax Controversy Forum

Program Sponsors:

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Exhibitor:

Pitbull Tax Software
Most colleges and law schools do not emphasize tax practice and procedure and, as a result, many practitioners are left to pick up this important information on their own from the trial and error of daily practice. Now is your chance to acquire an in-depth overview of how the United States tax system works. This program covers the basics of tax practice and procedure, from assessment to audit, appeals, Tax Court, and ultimately, collection and statutes of limitation. Even for experienced tax practitioners, this is a great opportunity to brush up on the basics.

Bryan C. Skarlatos, Esq., Partner, Kostelanetz & Fink, LLP, New York, NY

What are the most important things to consider when planning for an IRS audit? How do you handle aggressive revenue agents? What can you do when you realize that your client may have engaged in criminal behavior? Are there limits to what you have to tell the IRS? When do penalties come into play? How can you help generate a better outcome for your client? Learn the answers to these and many other questions from one of the country’s foremost experts on tax controversies. This program provides information and real-life examples that can’t be found in any book.

Charles P. Rettig, Esq., Principal, Hochman, Salkin, Rettig, Toscher & Perez, P.C., Beverly Hills, CA

You must register separately for these workshops and the related CLE/CPE credits. A fee of $149 for one workshop or $249 to attend both workshops will be charged. Space is limited, so please register in advance.

For more information, call (212) 992-3320. Register online at scps.nyu.edu/taxcontroversy.
8:40 A.M.

TAX ENFORCEMENT PRIORITIES: WHAT’S HAPPENING NOW?

Enforcement of the tax laws and collection of taxes has always been an important priority. Lately, however, the government is focusing on enforcement like never before. The Department of Justice and the IRS are constantly developing new strategies to ensure that all taxpayers report and pay the appropriate amount of tax. Hear about the current priorities and programs at the Department of Justice, the IRS Criminal Investigation Division, and the Small Business/Self-Employed Division of the Internal Revenue Service.

DEPARTMENT OF JUSTICE UPDATE

Kathryn Keneally, Esq., Assistant Attorney General, Tax Division, U.S. Department of Justice, Washington, DC [Invited]

Larry A. Campagna, Esq., Shareholder, Chamberlain, Hrdlicka, White, Williams & Aughty, Houston, TX

CRIMINAL INVESTIGATION DIVISION UPDATE

Richard Weber, Esq., Chief, Criminal Investigation Division, Internal Revenue Service, Washington, DC

Josh O. Unger, Esq., Partner, Meadows, Collier, Reed, Cousins, Crouch & Unger, L.L.P., Dallas, TX

SMALL BUSINESS/Self-Employed DIVISION UPDATE

Faris R. Fink, Esq., Commissioner, Small Business/Self-Employed Division, Internal Revenue Service, Washington, DC

Charles P. Rettig, Esq., Principal, Hochman, Salkin, Rettig, Toscher & Perez, P.C., Beverly Hills, CA

10 A.M.

EMERGING TRENDS IN GLOBAL ENFORCEMENT

The IRS is continuing to hone its ability to collect information about foreign assets, police the flow of money across borders and assess taxes arising from international transactions, and in extreme cases, prosecute foreigners for breaking U.S. tax laws. All tax practitioners need to understand where the government is heading in the increasingly complex and ever-changing area of global tax enforcement. This panel explores developments relating to international exchanges of information, selected provisions of the Foreign Asset Tax Compliance Act, the current status of the IRS’s Offshore Voluntary Compliance Initiative, and issues surrounding audits and prosecutions of non-compliant taxpayers.

Moderator: Scott D. Michel, Esq., Member, Caplin & Drysdale, Chartered, Washington, DC

John C. McDougal, Esq., Senior Special Trial Attorney, Office of Chief Counsel, Small Business/Self-Employed Division, Internal Revenue Service, Washington, DC [Invited]

Sharon Katz-Pearlman, Esq., National Principal-In-Charge, Tax Controversy Services, KPMG LLP, New York, NY, Global Head, Tax Dispute and Controversy, KPMG International

Rosemary J. Sereti, CPA, Industry Director, Financial Services, Office of Chief Counsel, Large Business and International Division, Internal Revenue Service, New York, NY

Daniel W. Levy, Esq., Assistant United States Attorney, United States Attorney’s Office, Southern District of New York, New York, NY

10:50 A.M.

REFRESHMENT BREAK
11 A.M.
CROSSING THE LINE: CIVIL AND CRIMINAL LIABILITY AND ETHICAL ISSUES FOR TAX PROFESSIONALS
How sure do you have to be before you can tell a client that it is okay to take a deduction or to characterize income as capital gain? Do you have to audit everything a client tells you, and when can you just rely on what a client says? When can you be held responsible for problems on a client’s tax return? This panel of expert tax practitioners discusses these and other thorny issues that arise in everyday tax practice. The panel reviews the ethical, civil, and criminal penalty standards that apply to accountants who give tax advice and discusses cases involving actual criminal prosecution of tax practitioners.

Moderator: Robert S. Fink, Esq., Partner, Kostelanetz & Fink, LLP, New York, NY
Mark F. Daly, Esq., Senior Litigation Counsel, Tax Division, U.S. Department of Justice, Washington, DC
Karen L. Hawkins, Esq., Director, Internal Revenue Service, Office of Professional Responsibility, Washington, DC
Paula M. Junghans, Esq., Partner, Zuckerman Spaeder LLP, Washington, DC

12 NOON
LUNCHEON KEYNOTE ADDRESS: TAX ADMINISTRATION PRIORITIES FROM THE OFFICE OF CHIEF COUNSEL
The IRS Chief Counsel addresses today’s high-profile topics in tax enforcement and tax administration.
William J. Wilkins, Esq., Chief Counsel, Internal Revenue Service; Assistant General Counsel, U.S. Department of the Treasury, Washington, DC
Miriam L. Fisher, Esq., Partner, Latham & Watkins LLP, Washington, DC

12.30–1.30 P.M.
LUNCHEON
BUFFET LUNCH SERVED

For more information, call (212) 992-3320. Register online at scps.nyu.edu/taxcontroversy
1.30–2.30 P.M.
BREAST OUT SESSIONS

TRACK I
ADVENTURES INTO THE UNKNOWN: HANDLING AUDITS AND LITIGATION INVOLVING PARTNERSHIPS AND OTHER PASS-THROUGH ENTITIES
With the increased use of partnerships and subchapter S corporations to conduct business, every practitioner needs to be familiar with the unique issues that arise when pass-through entities are audited. Which rules apply? Who is really being audited? Is the statute of limitations still open? How are penalties determined? This panel of experienced practitioners answers these and other questions to help guide you through your next pass-through audit.

Moderator: Thomas A. Cullinan, Esq., Partner, Sutherland Asbill & Brennan LLP, Atlanta, GA
Ronald L. Buch, Judge, United States Tax Court, Washington, DC
Armando Gomez, Esq., Partner, Skadden, Arps, Slate, Meagher & Flom LLP, Washington, DC
Henry S. Schneiderman, Esq., Special Counsel, Office of Associate Chief Counsel (Procedure and Administration), Internal Revenue Service, Washington, DC

TRACK II
FINDING HIDDEN TREASURE: HOW TO USE THE FREEDOM OF INFORMATION ACT (FOIA) AND OTHER TOOLS TO UNCOVER VALUABLE EVIDENCE
In most tax controversies, the taxpayer is in possession of the relevant evidence because it is the taxpayer’s return that is being contested. However, there are times when key pieces of information come from the government’s own files, but it can be hard to find that information without engaging in full-blown discovery. FOIA can be a valuable tool to unlock that evidence during the early phases of a controversy. Learn how to use FOIA in your next case to make a difference for your clients.

Fred F. Murray, Esq., Managing Director, Tax, Grant Thornton LLP, Washington, DC
Ellis L. Reemer, Esq., Partner, DLA Piper LLP (US), New York, NY
Kathryn A. Zuba, Esq., Deputy Associate Chief Counsel (Procedure and Administration), Office of Chief Counsel, Internal Revenue Service, Washington, DC
2.30–3.30 P.M.
BREAK OUT SESSIONS

TRACK I
BUT IT’S NOT MY FAULT! THE SCOPE OF THE REASONABLE CAUSE AND GOOD FAITH EXCEPTION TO TAX PENALTIES
The IRS is assessing more penalties than ever before. Is the IRS getting more aggressive or are there just more bad taxpayers? This panel of expert practitioners reviews the IRS’s attitude toward penalties as well as a number of recent court decisions that help to define when a taxpayer can credibly claim that he or she reasonably relied on their advisors to avoid penalties.

Moderator: Caroline D. Ciraulo, Esq., Partner, Rosenberg Martin Greenberg LLP, Baltimore, MD
Roland Barrel, Esq., Area Counsel, Financial Services, Office of Chief Counsel, Large Business and International Division, Internal Revenue Service, New York, NY
M. Todd Welty, Esq., Partner, Dentons, Dallas, TX
G. Michelle Ferreira, Esq., Managing Shareholder, Greenberg Traurig LLP, San Francisco, CA

3.30 P.M.
REFRESHMENT BREAK

TRACK II
THIS ISN’T YOUR GRANDFATHER’S TAX CONTROVERSY BUSINESS ANYMORE: RECENT DEVELOPMENTS IN ENFORCEMENT, AUDIT, AND PRIVILEGE ISSUES
Part of the government’s job is to aggressively push new theories to police the tax laws, and sometimes the courts bite. Several court decisions over the past year portend significant changes in the scope of the attorney-client privilege, use of the Fifth Amendment Act of Production Doctrine in tax cases, and the government’s ability to seize and forfeit professional fees. This panel reviews those cases and discusses how they affect everyday tax controversy practice.

Moderator: Ian M. Comisky, Esq., Partner, Blank Rome LLP, Philadelphia, PA
Brian R. Harris, Esq., Of Counsel, Akerman Senterfitt, Jacksonville, FL
Mark F. Daly, Esq., Senior Litigation Counsel, Tax Division, U.S. Department of Justice, Washington, DC
Steven R. Toscher, Esq., Principal, Hochman, Salkin, Rettig, Toscher & Perez, P.C., Beverly Hills, CA

For more information, call (212) 992-3320. Register online at scps.nyu.edu/taxcontroversy
BREAK OUT SESSIONS

TRACK I

FOLLOWING THE MONEY: DEVELOPMENTS IN THE GLOBAL HIGH WEALTH INDUSTRY GROUP
In 2009, the IRS created the Global High Wealth Industry Group to perform holistic audits of high-wealth individuals. While this initiative got off to a slow start, it has since picked up steam, and more and more audits are being initiated. This panel reviews how the IRS screens taxpayers for audit, the issues that are addressed, and how practitioners can prepare to represent their clients.

Jenny L. Johnson, Esq., Partner, Holland & Knight LLP, Chicago, IL
Megan L. Brackney, Esq., Partner, Kostelanetz & Fink, LLP, New York, NY
James C. Fee, Jr., Esq., Senior Legal Counsel, Global High Wealth Industry Group, Large Business and International Division, Internal Revenue Service, Washington, DC
David A. Lifson, CPA, Partner, Crowe Horwath LLP, New York, NY

TRACK II

TOO MUCH OF A BAD THING: THE DIFFERENCE BETWEEN CIVIL PENALTIES AND CRIMINAL TAX FRAUD AND RELATED ETHICAL ISSUES

“This is the way we’ve always run our business and we’ve never had a problem.”
“Everybody does it and I can’t compete if I report everything.”
“If they catch me, I’ll just pay the taxes and interest, right?”

Tax professionals often hear these kinds of statements from their clients. It is essential for practitioners to be able to advise clients when they run the risk of criminal prosecution. This panel of expert government and private practitioners explores the difference between simply owing more taxes and criminal tax fraud.

Lawrence S. Horn, Esq., Partner, Chair of the Business Crimes and Tax Litigation Practice Groups, Sills Cummis & Gross P.C., Newark, NJ
David B. Massey, Esq., Assistant United States Attorney, United States Attorney’s Office, Southern District of New York, New York, NY
Martin A. Schainbaum, Esq., Principal, Martin A. Schainbaum, P.L.C., San Francisco, CA

SPECIAL SKILLS WORKSHOP

IRS OFFERS IN COMPROMISE: A CASE STUDY
This comprehensive workshop takes participants on a hands-on journey through the entire IRS Offer in Compromise process, including how to effectively complete the appropriate financial disclosure package for individuals. This program provides you with the skills that will enable you to compute the reasonable collection potential, determine acceptable installment agreements, ascertain whether a client qualifies for Currently Not Collectible Status and advise your clients regarding pre-submission planning.

E. Martin Davidoff, CPA, Esq., Owner, E. Martin Davidoff & Associates, Dayton, NJ
UPCOMING CONFERENCES

72ND INSTITUTE ON FEDERAL TAXATION

OCTOBER 20–25, 2013
GRAND HYATT NEW YORK
NEW YORK, NY

NOVEMBER 17–22, 2013
THE FAIRMONT SAN FRANCISCO HOTEL
SAN FRANCISCO, CA

CO-CHAIRS:
William G. Cavanagh, Esq., Partner, Chadbourne & Parke LLP, New York, NY
Julie A. Divola, Esq., Partner, Pillsbury Winthrop Shaw Pittman LLP, San Francisco, CA

The Institute is designed for the practitioner who must frequently anticipate and handle federal tax matters. It provides high-level updates, practical advice you can implement, and in-depth analysis of the latest trends and developments from leading experts. Participants return to work with a wealth of materials, plus the tools and strategies needed to help save their clients’ tax dollars and provide them with better service. A six-day program encompassing all major areas of tax, including current developments; tax controversies; corporate tax; partnerships, LLCs, and real estate; trusts and estates; executive compensation and employee benefits; closely-held businesses; international tax; ethical transactions; and hot tax topics. The Institute attracts attorneys, both general tax practitioners and specialists; accountants; corporate treasury and compliance executives; tax managers; and financial planners seeking expert discussion of the latest technical, legislative, and planning developments. Just as important, the Institute provides the perfect setting to meet practitioners from around the country. It’s an opportunity for you to share ideas, exchange views, learn what others are doing, and obtain credit for continuing education. For more information, visit www.scps.nyu.edu/ift.

32ND INSTITUTE ON STATE AND LOCAL TAXATION

DECEMBER 12–13, 2013
GRAND HYATT NEW YORK
NEW YORK, NY

CO-CHAIRS:
Paul H. Frankel, Esq., Partner, Morrison & Foerster LLP, New York, NY
Lloyd J. Looram, CPA, Managing Director, The Looram Consulting Group, Inc., Palm Beach Gardens, FL

The Institute is designed for the practitioner who must frequently anticipate and handle state and local tax matters. It provides high-level updates, practical advice you can implement, and in-depth analysis of the latest developments and current issues in all areas of state and local taxation. Attendees learn practical solutions and valuable insights from leading authorities throughout the profession. Just as important, the Institute provides the perfect setting to meet practitioners from around the country. It’s an opportunity to share ideas, exchange views, learn what others are doing, and obtain credit for continuing education. For more information, visit www.scps.nyu.edu/salt.
GENERAL INFORMATION

CONFERENCE FEE
The conference fee of $495 includes the one-day tuition, continental breakfast, lunch, refreshment breaks, and all written materials. If you are a full-time government official, the fee is $295. You must provide proof of full-time government employment with registration. You may register online, by mail or on-site at the conference. To register by mail, complete the registration form and return it with a check or money order. All registrations sent by mail must be received by 12:00 noon on Tuesday, June 4, 2013 (Eastern Standard Time). Full and partial scholarships based upon financial need are available as well. To request an application, please call (212) 992-3320, fax (212) 992-3650, or e-mail your request to scps.tax@nyu.edu. Invited speakers are pre-registered.

OPTIONAL THURSDAY EVENING WORKSHOP FEES:
You must register separately for one or both of the Thursday evening workshops and the related CLE/CPE credits. The fee to attend one of the evening session workshops is $149. To attend both of the evening session workshops, the fee is $249. We strongly advise you to register in advance as space is limited. Walk-in registrations for the Thursday evening session workshops cannot be guaranteed.

To register on-site, you may pay by check, money order, or credit card. New! To pay by credit card, all walk-ins will be required to self-register at available kiosks. For faster service, conference attendees should plan to register in advance online at scps.nyu.edu/taxcontroversy. To register online for the full-time government official discount, please call (212) 992-3320 for a special discount code.

PRESS BADGES
If your publication plans to cover the NYU-SCPS 5th Annual Tax Controversy Forum, please e-mail coverage and press credentials to scps.press@nyu.edu.

ELECTRONIC REGISTRATION CONFIRMATION
An automated e-mail confirmation will be sent to the e-mail address provided to NYU-SCPS at the time of registration. Please use an individual e-mail address for each registrant. If a confirmation is not received within two days of online registration submission (allow one–two weeks for registrations sent by mail), e-mail scps.tax@nyu.edu to request a duplicate copy.

CONFERENCE LOCATION AND HOTEL ACCOMMODATIONS
The Crowne Plaza Times Square Manhattan is located at 1605 Broadway and 49th Street. Accommodations also are available at the hotel, which is easily accessible to Times Square, Broadway theaters, Radio City Music Hall, Carnegie Hall, Rockefeller Center, Central Park, and Fifth Avenue shopping. Single or double occupancy rooms are available at the NYU-SCPS group rate of $329 by calling (888) 233-9527 and referring to the NYU-SCPS Tax Forum. Book your reservation in advance. Hotel rooms can sell out prior to cut-off date. These rooms will be held as a block, unless exhausted, until May 20, at which time they will be released to the general public.

CANCELLATION AND SUBSTITUTION POLICY
A written request for cancellation must be faxed to (212) 992-3650 or e-mailed to scps.tax@nyu.edu to the attention of: Conference Administration. Requests received by May 31 will receive a 100% tuition refund less a $100 cancellation fee. Due to financial obligations incurred by NYU-SCPS, there are no refunds available after May 31. We are not able to arrange cancellation exceptions or to accept on-site cancellations. If you cannot attend but would like to send someone in your place, please fax written notification to (212) 992-3650 or e-mail scps.tax@nyu.edu no later than June 4.

BADGE AND MATERIAL PICK-UP
The NYU-SCPS registration desk will open, and materials will be available beginning at 8 a.m. on Friday, June 7. If you are attending one or both of the Thursday evening session workshops, a separate badge and materials will be available for pick up.
outside the workshop meeting room on Thursday, June 6, beginning at 4:30 p.m. Proper photo identification is required for badge retrieval. One set of conference materials per paid registrant is provided at time of badging. Badges must be displayed in all public spaces throughout the conference.

SPECIAL NEEDS
Any participant who has special needs (physical or dietary), is encouraged to e-mail scps.tax@nyu.edu or call the Department of Finance, Law, and Taxation at (212) 992-3320 at least two weeks prior to the conference start date to indicate their particular requirement.

SPONSORSHIP AND EXHIBIT OPPORTUNITIES
For information on becoming a Forum Sponsor or exhibiting at the conference, please contact Kathleen Costello at (212) 992-3320 or kathleen.costello@nyu.edu.

CONTINUING EDUCATION CREDIT
The New York University School of Continuing and Professional Studies is a recognized leader in professional continuing education. The Division of Programs in Business Department of Finance, Law, and Taxation has been certified by the New York State Continuing Legal Education Board as an Accredited Provider of continuing legal education in the State of New York. This conference meets the educational requirements of many organizations and agencies with mandatory CLE/CPE filing requirements. We urge you to contact our office at least 30 days prior to the conference start date by phone at (212) 992-3320 or by e-mail at scps.tax@nyu.edu to ensure the availability of credit for a specific state.

ESTIMATED CONTINUING EDUCATION CREDITS
6.5 based on a 60-minute hour, including 2.0 ethics credits
8.0 based on a 50-minute hour, including 2.0 ethics credits

THURSDAY EVENING WORKSHOP CREDITS:
2.0 based on a 60-minute hour
2.0 based on a 50-minute hour

Except where indicated, CLE credits are non-transitional in the categories of professional practice/practice management. CLE boards define a credit hour as either 60 minutes or 50 minutes.

Recommended CPE credits are in the following NASBA Fields of Study: Taxes; Regulatory Ethics.

In accordance with the Standards of the National Registry of CPE Sponsors, CPE credits are based on a 50-minute hour. Please note that not all state boards accept half credits.

The New York University School of Continuing and Professional Studies Division of Programs in Business Department of Finance, Law, and Taxation is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors through its website: www.learningmarket.org.


New York and Texas require sponsors to individually register with their states as continuing professional education sponsors; New York University School of Continuing and Professional Studies is a registered sponsor in the State of New York (Sponsor ID# 000493) and the State of Texas (Sponsor ID# 000439).

A certificate of attendance is given to each registrant and validated upon completion of the program. For questions concerning credit hours or approvals, please call (212) 992-3320.
REGISTRATION INSTRUCTIONS

ONLINE REGISTRATION
• Visit scps.nyu.edu/taxcontroversy
• Highly recommended for fastest response
• Automated e-mail confirmation will be sent to the e-mail address provided to NYU-SCPS at the time of registration
• Please use an individual e-mail address for each registrant
• Major credit cards accepted: American Express®, Discover®, MasterCard®, or Visa®

OTHER REGISTRATION OPTIONS
Mail: To register by mail, complete the registration form, and return it with a check or money order made payable to New York University. Mail to the address below. Payment must accompany the registration form. An e-mail confirmation of registration will be sent to the e-mail address provided to NYU-SCPS. Fill out a separate form for each registration. Send to: NYU-SCPS Budget Office, New York University, 7 East 12th Street, 12th Floor, New York, NY 10003, Attention: 5th Annual Tax Controversy Forum

On-Site: To register on-site, you may pay with check, money order, or credit card. New! To pay by credit card, all walk-ins will be required to self-register at available kiosks. For faster service, conference attendees should plan to register in advance online at scps.nyu.edu/taxcontroversy.

All registrations sent by mail must be received by 12 noon on Tuesday, June 4, 2013 (Eastern Standard Time). To register on-site, visit the NYU-SCPS registration desk at the Crowne Plaza Times Square Manhattan beginning at 8 a.m. on Friday, June 7, 2013. We do not accept faxed registrations or wire transfers as a form of payment.

For further information regarding administrative policies, such as complaints and refunds, or if you need help registering, please call our Conference Administrators at (212) 992-3320.
Online:  scps.nyu.edu/taxcontroversy

Mail To:  NYU-SCPS Budget Office, New York University
          7 East 12th Street, 12th Floor, New York, NY 10003
          Attention: 5th Annual Tax Controversy Forum

_______ Individual Registration for $495
_______ Full-Time Government Official Discount Registration for $295
To qualify: Please enclose identification.
_______ Additional Fee for One Thursday Evening Workshop $149
Select One:  □ 4.30 p.m. — Nuts and Bolts □ 5.30 p.m. — Hot Tips
_______ Additional Fee for Both Thursday Evening Workshops $249

Print or type clearly. This information will appear on the attendee list and on your badge. (E-mails will not be publicized.)

Name:
Firm:
Address:
City: State: Zip Code:

E-mail*:
(*E-mail is required—registration confirmations are sent via e-mail.)

Business Phone:

I am a/n □ CPA □ ATTORNEY □ EA □ OTHER
I require □ CLE Credit □ CPE Credit
FOR CLE ONLY: For which state(s) is CLE credit being requested: _____________

CAN’T ATTEND?
If you are unable to attend the Forum but would like to receive a copy of the written materials, please send your request to: NYU-SCPS, Tax Controversy Forum Book Orders, 11 West 42nd Street, Suite 400A, New York, NY 10036, or call (212) 992-3320; fax (212) 992-3650, or e-mail scps.tax@nyu.edu to reserve your copy. Reserve your copy by June 4, 2013. We cannot guarantee a selection after June 4. The price for each book is $195. There is no additional charge for shipping and handling in the continental U.S. Please add an additional $20 when shipping orders outside the continental U.S. Please make check or money order payable to New York University. Materials are mailed at the conclusion of the Tax Controversy Forum.

Please send me: □ 5th Annual Tax Controversy Forum Written Materials

Name:
Firm:
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City: State: Zip Code:

E-mail:

Business Phone:
UPDATES FROM

Faris R. Fink
Commissioner, Small Business/Self-Employed Division of the IRS

Karen L. Hawkins
Director, IRS Office of Professional Responsibility

Richard Weber
Chief, Criminal Investigation Division of the IRS

Kathryn Keneally
Assistant Attorney General, Tax Division of DOJ [Invited]

DON'T MISS PROGRAMS ON:

• International Enforcement
• Civil and Criminal Liability for Tax Practitioners
• Use of FOIA in Tax Cases
• How to Handle Partnership Audits

NEW SPECIAL SKILLS PROGRAMS ON:

• Tax Procedure
• Hot Tips for Handling Audits
• Preparing Offers in Compromise

For more information, call (212) 992-3320.
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