



Connect. Engage. Impact.

2026 Audits & Appeals Seminar

Capital One Conference Center, McLean, VA
September 8 - 10

Tuesday, September 8, 2026

12:00 PM - 1:00 PM

LUNCH

1:00 PM - 1:15 PM

WELCOME & INTRODUCTIONS

SALT 1:15 PM - 2:15 PM

Anticipating State Tax Audits and Controversy: Managing Audit Triggers and Aggressive Positions

Michele Borens | Eversheds Sutherland LLP

Jeffrey Friedman | Eversheds Sutherland LLP

2:15 PM - 2:30 PM

BREAK

SALT 2:30 PM - 3:30 PM

Strategic Considerations for Managing Your Audit and Litigation Portfolio

Maria Todorova | Eversheds Sutherland LLP

3:30 PM - 3:45 PM

BREAK

3:45 PM - 4:45 PM

Audit Issues Around the Country

Phil Horwitz | Ryan LLC

Elizabeth Cha | Eversheds Sutherland LLP

Timothy Gustafson | Eversheds Sutherland LLP

5:00 PM - 8:00 PM

**WELCOME RECEPTION AT OMETEO
SPONSORED BY EVERSHERDS SUTHERLAND**

Wednesday, September 9, 2026

8:30 AM - 9:30 AM

Ethical Dilemmas Facing State Tax Professionals

Mary Monahan | Eversheds Sutherland LLP

Timothy Gustafson | Eversheds Sutherland LLP

9:30 AM - 9:45 AM

BREAK

9:45 AM - 10:45 AM

Administrative Procedure, Settlements, and Voluntary Disclosure

Jonathan Feldman | Eversheds Sutherland LLP

Greg Matson | Eversheds Sutherland LLP

10:45 AM - 11:00 AM

BREAK

11:00 AM - 12:00 PM

Financial Statement Considerations of State Tax Controversies

Robert Ozmun | PricewaterhouseCoopers LLP

Robert Porcelli | PricewaterhouseCoopers LLP

Audits & Appeals Seminar

Wednesday, September 9, 2026 (Cont.)

	12:00 PM - 1:30 PM	Navigating AI in the Tax Department: Opportunity, Risk, and Ethical Boundaries Geoffrey Collins Mayer Brown LLP Erin Choe Capital One Financial Corporation Aaron Foster Crowe LLP
SALT	1:30 PM - 2:30 PM	The Art of Persuasion in Administrative Appeals: Facts, Experts, and Effective Presentation Jessica Brown Ernst & Young LLP Bradley Pees Nestlé USA, Inc.
	2:30 PM - 2:45 PM	BREAK
FED	2:45 PM - 3:45 PM	The Economic Substance Doctrine in Examinations and Appeals: Evolving Trends and Practical Responses Starling Marshall Crowell & Moring LLP Eric Solomon Ivins, Phillips & Barker, Chartered Adriana Wirtz Tax at Vinson & Elkins LLP Brian Gardner Asbury Gardner Tax Counsel
	3:45 PM - 4:00 PM	BREAK
	4:00 PM - 5:00 PM	Appeals Roundtable Discussion Featuring David Borden, Chief, Independent Office of Appeals David Borden Internal Revenue Service William Colgin Holland & Hart LLP Elizabeth Askey Skadden, Arps, Slate, Meagher & Flom LLP
	5:00 PM - 6:30 PM	RECEPTION AT SISTERS TYSONS SPONSORED BY MAYER BROWN

Thursday, September 10, 2026

FED	8:30 AM - 9:30 AM	LB&I Roundtable Discussion Featuring Mabeline Baldwin, LB&I Commissioner (Acting), & Brenda Sarini, Director, Northeastern Compliance Practice Area (Acting) Brenda Sarini Internal Revenue Service Nikole Flax PricewaterhouseCoopers LLP Maybeline Baldwin Internal Revenue Service Brian Kaufman Capital One Financial Corporation
	9:30 AM - 9:45 AM	BREAK
FED	9:45 AM - 10:45 AM	International Roundtable Discussion Featuring Nicole Welch Director, Treaty & Transfer Pricing Operations (LB&I) Nicole Welch Internal Revenue Service Li Mei Microsoft Corporation Sonal Majmudar Mayer Brown LLP David Farhat Skadden, Arps, Slate, Meagher & Flom LLP

Audits & Appeals Seminar

Thursday, September 10, 2026 (Cont.)

- FED** 11:00 AM - 12:00 PM **The Evolving DOJ Structural Landscape: Challenges and Opportunities**
Diana Erbsen | DLA Piper LLP (US)
Joshua Wu | U.S. Department of Justice
David Foster | Kirkland & Ellis LLP
- FED** 12:00 PM - 2:00 PM **The Evolving IRS Landscape: Challenges and Opportunities**
Robert Kovacev | Miller & Chevalier, Chartered
Sharon Katz-Pearlman | Greenberg Traurig
Brian Kaufman | Capital One Financial Corporation
Jennifer Best | Baker McKenzie
Douglas O'Donnell | KPMG LLP
- FED** 2:00 PM - 3:00 PM **Alternatives to Traditional Service Center Engagement**
Anson Asbury | Asbury Gardner Tax Counsel
Todd Reinstein | Forvis Mazars, LLP
Alina Solodchikova | RSM US LLP
- 3:00 PM - 3:15 PM **BREAK**
- FED** 3:15 PM - 4:15 PM **Latest Trends in Research Credit Documentation and Examination Featuring David Hudson Senior Advisor, LB&I**
Jason Massie | MASSIE R&D Tax Credits
Alex Sadler | Morgan, Lewis & Bockius LLP
Paul DiSangro | Mayer Brown LLP