



Audits & Appeals Seminar | September 20-22 | Capital One Hall | Tysons, VA

## 2022 Audits & Appeals Seminar

### The Post-Pandemic Future is Now: Managing Examinations and Appeals in the New Environment

- ▶ After enduring years of budget cuts and facing unprecedented challenges from the pandemic, the operational tide at the IRS is turning. The agency has received significant levels of new funding, pandemic-related disruptions are easing, and thousands of new professionals are joining the workforce. These changes will continue to have meaningful impacts on large business tax administration, audits, and appeals not only at the IRS, but in state and local jurisdictions across the country.
- ▶ TEI's [2022 Audits & Appeals Seminar](#) will delve deeply into how tax administration has shifted and will equip in-house tax professionals with the tools and knowledge needed to succeed in this new environment. Offered as an in-person event for the first time in three years, the three-day seminar will take place September 20-22 at the recently opened Capital One Hall in Tysons, Virginia, just outside Washington, DC. [Registration](#) is now open!
- ▶ The seminar offers two distinct tracks - **Federal Tax Controversies** and **State & Local Tax Controversies**. The first day and a half is devoted to U.S. federal controversy matters and will offer several sessions for professionals new to the game and sessions for seasoned professionals seeking updates on challenging controversy areas. The second day and a half is devoted to SALT matters and will cover the most pressing challenges in-house professionals face when managing state and local audits and appeals.
- ▶ An important aspect of this three-day seminar is the **multiple sessions involving senior IRS leadership and other public and governmental officials**, providing opportunities for attendees to make connections and hear first-hand how tax administration is changing. Attendees will also get insider insights from state auditors and state tax court judges.





# 2022 Audits & Appeals Seminar

## Federal Tax Controversies

Connect. Engage. Impact.

Tuesday, September 20

Time (ET)

|                     |   |
|---------------------|---|
| 7:45 am - 4:00 pm   | <b>Registration</b>   |
| 7:30 - 8:15 am      | <b>Continental Breakfast</b>  |
| 8:15 - 8:30 am      | <b>Welcome &amp; Opening Remarks</b>  |
| 8:30 - 9:30 am      | <p><b>LB&amp;I Leadership Roundtable: Large business tax enforcement and administration updates</b></p> <p>Brian Kaufman   Capital One Financial Corporation   <b>Moderator</b><br/>         Nikole Flax   Commissioner, IRS Large Business &amp; International Division<br/>         Robin Greenhouse   Division Counsel, IRS Large Business &amp; International Division<br/>         Brian Kittle   Mayer Brown LLP</p>  |
| 9:30 - 10:30 am     | <p><b>IRS Appeals Process Updates: What has changed and the outlook for the future</b></p> <p>April Adams-Johnson   Senior Advisor to the Chief of Appeals, IRS Independent Office of Appeals<br/>         Shahid Babar   Deputy Chief (Acting), IRS Independent Office of Appeals<br/>         Jean Pawlow   Latham &amp; Watkins LLP<br/>         Dan Rosen   Baker McKenzie LLP</p>  |
| 10:30 - 11:00 am    | <b>Break</b>  |
| 11:00 am - 12:00 pm | <p><b>IRS Technology Initiatives and their Impacts on Large Business Taxpayers</b></p> <p>Brian Kaufman   Capital One Financial Corporation   <b>Moderator</b><br/>         Carolyn Morton   Director, Program and Business Solutions, IRS Large Business &amp; International Division<br/>         Kaschit Pandya   Deputy Chief Information Officer, IRS IT Operations</p>  |
| 12:00 - 1:30 pm     | <b>Networking Lunch</b>   |
| 1:30 - 2:30 pm      | <p><b>IRS/Practitioner Roundtable: Working together to improve transfer pricing examinations</b></p> <p>Cliff Mangano   Vice Chair, TEI Administrative Affairs Committee   <b>Moderator</b><br/>         Brad Anwyll   Director, Field Operations — Transfer Pricing Practice, IRS Large Business &amp; International Division<br/>         Elizabeth Askey   Deputy Division Counsel (International), IRS Office of Chief Counsel, Large Business &amp; International Division<br/>         Summer Austin   Baker McKenzie LLP<br/>         Jason Osborn   Mayer Brown LLP</p> |





# 2022 Audits & Appeals Seminar

## Federal Tax Controversies

Connect. Engage. Impact.

**Tuesday, September 20**

Time (ET)

1:30 - 2:30 pm



**IRS/Practitioner Roundtable: Working together to improve research credit examinations**

Brian Kaufman | Capital One Financial Corporation | **Moderator**

Amy Llopiz | Supervisory Internal Revenue Agent, IRS Large Business & International Division

Trent Museus | Senior Manager, Engineering Territory 8, IRS Large Business & International Division

Rob Kovacev | Miller & Chevalier Chartered

Diane Stogiannes | DST Advisory Group

2:30 - 2:40 pm

**Break**

2:40 - 3:40 pm



**Strategic Considerations in Managing IRS Audits**

Colleen Brown | Barrick Gold Corporation | **Moderator**

Mark Mesler | Asbury Law Firm

Rob Morris | Norton Rose Fulbright US LLP



**Managing TCJA Examinations: Emerging Issues and Best Practices including FTC issues**

Sushil Pokharel | Capital One Financial Corporation | **Moderator**

Anne Devereaux | Gibson, Dunn & Crutcher LLP

Aaron Vaughan | KPMG LLP

3:40 - 4:00 pm

**Break**

4:00 - 5:00 pm



**Documentation Best Practices: What, how, where, for how long?**

Bradley Pees | Nestlé USA | **Moderator**

William Colgin | Holland & Hart LLP

Edward Froelich | Morrison & Foerster LLP



**Technology Tools You Can Use to Improve Your Research Credit Process Today**

Kelvin Ramirez | Informatica | **Moderator**

Jason Massie | MASSIE R&D Tax Credits

Alex Sadler | Morgan, Lewis & Bockius LLP

5:00 - 6:30 pm

**Reception - Sponsored by Mayer Brown LLP**





Connect. Engage. Impact.

# 2022 Audits & Appeals Seminar

## Federal Tax Controversies

Wednesday, September 21

### Time (ET)

7:45 am - 4:00 pm

7:45 - 8:30 am

8:30 - 9:30 am



### Registration

### Continental Breakfast

### Strategic Interactions with the IRS

Colleen Brown | Barrick Gold Corporation | **Moderator**

Tom Greenaway | KPMG LLP

De Lon Harris | Skadden, Arps, Slate, Meagher & Flom LLP

### Managing Internal Stakeholders

Brian Kittle | Mayer Brown LLP | **Moderator**

Kristen Bauer | Stripe, Inc.

Walter Doggett | Arvest Bank

Mary Kim Elkins | Eaton Corporation

### Break

### Best Practices for Responding to IDRs, Including Privilege and Controlling Information Flow in an Audit Setting

Kristen Bauer | Stripe, Inc. | **Moderator**

Nathan Clukey | Sidley Austin LLP

Starling Marshall | Crowell & Moring LLP

### Managing the Growing Risk of Transfer Pricing Positions

Cliff Mangano | Vice Chair, TEI Administrative Affairs Committee | **Moderator**

Jenny Austin | Mayer Brown LLP

Lisandra Ortiz | Miller & Chevalier Chartered

Gene Tien | Baker & McKenzie Consulting LLC

### Break

### Minimizing Risk of and Defending Against Penalties

Brad Pees | Nestlé USA | **Moderator**

Henry Cheng | DLA Piper LLP (US)

James Kelly | Mayer Brown LLP

### Partnership Audit Developments, Including LB&I's Large Partnership Audit Initiative

Walter Doggett | Arvest Bank | **Moderator**

Lee Meyercord | Holland & Knight LLP

Kathleen (Kat) Saunders Gregor | Skadden, Arps, Slate, Meagher & Flom LLP

12:10 - 1:45 pm

### Joint Program Networking Lunch





# 2022 Audits & Appeals Seminar

## State & Local Tax Controversies

Connect. Engage. Impact.

Time (ET)

1:45 - 2:45 pm

Audit Management Portals - Using Workflow/Task Management Tools and Visualization Dashboards to Manage Audits

Erika Aderholz | Ernst & Young LLP

2:45 pm

The Federal Tax Controversies section of the program concludes.

12:10 - 1:45 pm

Joint Program Networking Lunch

1:45 - 2:45 pm

Audit Management Portals - Using Workflow/Task Management Tools and Visualization Dashboards to Manage Audits

Erika Aderholz | Ernst & Young LLP

2:45 - 3:45 pm

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

Jeffrey Friedman | Eversheds Sutherland (US) LLP

Michele Borens | Eversheds Sutherland (US) LLP

3:45 - 4:00 pm

Break

4:00 - 5:00 pm

Welcome To An Audit

Timothy Gustafson | Eversheds Sutherland (US) LLP

Maria Todorova | Eversheds Sutherland (US) LLP

5:00 - 6:30 pm

Reception - Sponsored by Eversheds Sutherland LLP

Thursday, September 22

8:00 - 9:00 am

Registration

8:00 - 9:00 am

Continental Breakfast

8:30 - 9:30 am

Clear, Direct, and Persuasive Writing

Jeffrey Friedman | Eversheds Sutherland (US) LLP

Ben Opipari | Persuasive Matters

9:30 - 10:30 am

SALT Scoreboard Review - What Are the Most Litigated Issues and Are Taxpayers Winning?

Nikki Dobay | Eversheds Sutherland (US) LLP

Charlie Kearns | Eversheds Sutherland (US) LLP

10:30 - 10:45 am

Break





Connect. Engage. Impact.

# 2022 Audits & Appeals Seminar

## State & Local Tax Controversies

Thursday, September 22

Time (ET)

10:45 - 11:45 am

State Auditors Roundtable - A Discussion with MTC and State Auditors

Michael Bryan | Deputy Director, Audit Activity, New Jersey Division of Taxation

Holly Coon | Director, Multistate Tax Commission Joint Audit Program

Robert Kindred | MST, Audit Chief for the District of Columbia Office of Tax & Revenue

James McAndrews III | Director of Audit and Criminal Investigations for the  
District of Columbia Office of Tax & Revenue

12:00 - 1:30 pm

Lunch Program

Audit Therapy: An Interactive Discussion of Industry Personnel  
Sharing Experiences

Jeffrey Friedman | Eversheds Sutherland (US) LLP | Moderator

1:30 - 2:30 pm

Ethical Dilemmas Facing State Tax Professionals

Ted Friedman | Eversheds Sutherland (US) LLP

Dan Schlueter | Eversheds Sutherland (US) LLP

2:30 - 2:45 pm

Break

2:45 - 4:00 pm

State Tax Judges Panel - Hear from the Other Side of the Bench

Richard Pomp | University of Connecticut School of Law | Moderator

Roberta Moseley Nero | President of New York State Tax Appeals Tribunal (Ret.)

Judge Martha Blood Wentworth | Indiana Tax Court

4:00 pm

Adjourn





# 2022 Audits & Appeals Seminar

## GENERAL INFORMATION

### Registration Fees

Registrants may register for the full 3-day program or one of the 1.5-day Federal Tax or 1.5-day SALT programs.

| Full Seminar (3-day)         | TEI Member | Non-Member |
|------------------------------|------------|------------|
| Early (by August 23)         | \$850      | \$1,100    |
| Regular (after August 23)    | \$950      | \$1,200    |
| Federal Tax (1.5 days)       |            |            |
| Early (by August 23)         | \$650      | \$800      |
| Regular (after August 23)    | \$750      | \$900      |
| State & Local Tax (1.5 days) |            |            |
| Early (by August 23)         | \$650      | \$800      |
| Regular (after August 23)    | \$750      | \$900      |

### Registrations

TEI Events are open to members of TEI and other in-house tax professionals. Individuals engaged in private law, accounting, or other consulting practice, as well as government employees, are ineligible to attend.

### Format

This seminar will feature a combination of lectures and open discussions. Electronic links to session handouts and other materials will be provided to registrants prior to the seminar. Casual attire is suitable for all educational sessions and other functions. The classrooms are air conditioned, so a light sweater may be appropriate.



**By web:** [www.tei.org](http://www.tei.org). You must log in before registering.



**By mail:** Send registration form with check or credit card information to Tax Executives Institute, Lockbox 9407 PO Box 70280, Philadelphia, PA 19176-0280.



**By fax:** 202.638.5607. Credit card registrations only.



**By email:** Scan and send completed registration form with credit card information to [meetings@tei.org](mailto:meetings@tei.org).

### Cancellation and Substitution Policy

All cancellations must be made in writing by 4:00 pm ET on September 2, 2022, and will be subject to an administrative service charge of \$75; for cancellations after September 2, 2022 and before September 9, the charge will be \$200. No refunds will be made for cancellations received after September 9 and for no-shows. To cancel, please send an email to [meetings@tei.org](mailto:meetings@tei.org). In the event of cancellation or over-subscription of the conference, TEI's liability is limited to the return of the registration fee. There will be a \$50 substitution fee assessed if you would like to change registrants. Email requests to [meetings@tei.org](mailto:meetings@tei.org). In the event the seminar must be canceled or is oversubscribed, TEI's liability is limited to the return of the Seminar registration fee.



### Financial Aid for Illinois Licensed Attorneys

Scholarships to defray tuition expense for this program are available for in-house tax professionals (both TEI members and nonmembers) who are temporarily unemployed and who are Illinois licensed attorneys with a demonstrated financial hardship. Scholarships will be reviewed and provided upon application on a case-by-case basis. Attorneys who qualify will receive at least a 50% reduction in the conference fee (which does not include any reduction or reimbursement for meals, lodging, or travel costs associated with the seminar). To request information on whether you might qualify, please contact us at [meetings@tei.org](mailto:meetings@tei.org).

### Accommodations

TEI is holding a discounted block of rooms at The Watermark Hotel for seminar attendees at \$199 + tax per night. Our \$199 group rate is limited and will likely sell out prior to our August 29, 2022 cut-off date. We encourage registrants to make reservations as soon as you know you are attending. [CLICK HERE](#) for online reservations. You may also call 703-707-0478 for reservations; be sure to mention you are with the "Tax Executives Institute Tax Conference."

The \$199 rate includes a full breakfast buffet in the hotel dining area each morning. Rates outside our TEI block are currently selling for \$299 + tax per night.

The Watermark Hotel is part of the Capital One Headquarters Complex and is the closest hotel to the Capital One Hall Conference Space where our meeting will be held.

The Watermark Hotel  
1825 Capital One Drive South  
McLean, VA 22102

### Recording Devices

The use of tape or digital recorders in the classroom is prohibited. Please silence all devices upon entering the meeting room.

### Questions?

Call TEI at 202.638.5601, email to [meetings@tei.org](mailto:meetings@tei.org) or visit [www.tei.org](http://www.tei.org). Click on "Events & Education."

### CPE Credit Information

CPE Credit Information: Tax Executives Institute Education Foundation is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of "group live based" continuing professional education on the National Registry of CPE Sponsors.

Date September 20-22, 2022 (ET)

Delivery Method Group Live

Program Level Overview

Field of Study Taxes, Professional Ethics

Prerequisite None

Advanced Preparation No advanced preparation required.

CPE Credit Taxes: A maximum of 18.25 credits based on a 50-minute hour.  
Professional Ethics: A maximum of 1.00 credits based on a 50-minute hour.

### Disclaimers

State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. To submit a complaint about a specific program, speaker or content, please send to [meetings@tei.org](mailto:meetings@tei.org). Complaints regarding sponsors may be addressed to National Registry of CPE Sponsors, 150 Fourth Avenue North, Ste. 700, Nashville, TN 37219-2417. Website: [www.nasbaregistry.org](http://www.nasbaregistry.org)







# 2022 Audits & Appeals Seminar

## ELIGIBILITY

TEI events are open to members of TEI and other in-house tax professionals. Individuals engaged in private law, accounting, or other consulting practices, as well as government employees, are ineligible to attend.

### Registration Fees (in U.S. \$)

3-Day Registration

Early Bird (by 8/23)

\$850 Member

\$1,100 Non-Member

Regular (after 8/23)

\$950 Member

\$1,200 Non-Member



1.5-Day Registration

FEDERAL

Early Bird (by 8/23)

\$650 Member

\$800 Non-Member

Regular (after 8/23)

\$750 Member

\$900 Non-Member



1.5-Day Registration

SALT

Early Bird (by 8/23)

\$650 Member

\$800 Non-Member

Regular (after 8/23)

\$750 Member

\$900 Non-Member

Please check here if you require special accessibility or assistance at this function. We will contact you.



## REGISTRATION FORM

The registration fee covers course materials and other items specified in the seminar announcement. Applications will be accepted on a first-come, first-served basis. Registrants are encouraged to register via [www.tei.org](http://www.tei.org). Credit card registrations may be scanned and emailed to: [meetings@tei.org](mailto:meetings@tei.org). If registering by check, make checks payable to Tax Executives Institute and mail to Tax Executives Institute, Lockbox 9407 PO Box 70280, Philadelphia, PA 19176-0280. Do not mail registrations to TEI's street address. Questions? Call 202.638.5601 or email: [meetings@tei.org](mailto:meetings@tei.org).

Name

Company

Mailing Address

City

State/Province Zip/Zone

Telephone/Fax

Email

Charge to:    VISA        MasterCard        American Express        Discover        Diners Club

Card Number

Exp. Date CVV

Cardholder Name (print)

Signature

Fax number for registrations is 202.638.5607. This form can be scanned and emailed to [meetings@tei.org](mailto:meetings@tei.org).

All cancellations must be made in writing by 4:00 pm ET on September 2, 2022, and will be subject to an administrative service charge of \$75; for cancellations after September 2, 2022 (the date handout materials become available) and before September 9, 2022, the charge will be \$200. No refunds will be made for cancellations received after September 9, 2022, and for no-shows. Cancellations or substitutes must be received in writing to [meetings@tei.org](mailto:meetings@tei.org). Refunds of credit card registrations, less the administrative charge, will be made to credit card account. TEI's Taxpayer ID Number is 52-0239291.



Connect. Engage. Impact.

# 2022 Audits & Appeals Seminar

## COVID-19 SAFETY PROTOCOLS

### COVID-19

TEI is pleased to welcome the in-house tax professional community back to in-person events! Our top priority remains the health and safety of our attendees, sponsors, speakers, and staff. By observing COVID-19 safety guidelines established by the Centers for Disease Control and Prevention, we believe that we, along with our partners at the Capital One Hall, can foster a safe, welcoming environment for our communities to share the experiences they rely on TEI to provide. Accordingly, attendees must agree to comply with all COVID-19 safety protocols established by TEI and the Capital One Hall.

Participants cannot attend the event if they are feeling unwell, have been in contact with someone who has tested positive for COVID-19 within seven days leading up to the event, or have displayed COVID-19 symptoms within 48 hours preceding the event. These symptoms may include fever or chills, coughing, shortness of breath, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, and diarrhea. If you cannot attend the event for any of these reasons, TEI's staff will work with you to transfer your registration to the following year's event or provide a full refund, at the attendee's choice. If an attendee becomes unwell during an event, he or she should not reenter the event space, but rather should immediately inform a TEI staff member via telephone or email, and we will work with the Capital One Hall to isolate the individual and seek medical attention as needed. If an attendee becomes unwell within the five days following the event, please notify TEI immediately by emailing [meetings@tei.org](mailto:meetings@tei.org).