

Federal Bar Association 2020 44th Annual Tax Law Conference

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Washington, DC

Multiple Miller & Chevalier attorneys will speak at the Federal Bar Association 2020 44th Annual Tax Law Conference on March 6, 2020, in Washington, DC.

Layla Asali will speak on the "International M&A Panel." Panelists will discuss how changes in the international tax area as a result of the TCJA impact cross-border transactions and the issues that taxpayers need to consider in such transactions. Additionally, this panel will discuss recent guidance from the IRS and the Treasury Department in the international M&A area.

Jorge Castro will moderate the panel titled, "Tax Legislative Update." This panel will cover key pending policy issues, upcoming tax legislation, and the legislative priorities in the House and Senate.

Thomas Cryan* will present, "Taxation of Employment Related Settlements," a panel discussion on the proper tax treatment of common aspects of employment-related settlements, including which payments are included in income, when withholding applies, and who is responsible for withholding and reporting.

Steven Dixon* will present, "International Information Reporting Penalties." This panel will discuss the various penalties relating to international information reporting, including penalties related to Form 3520. The panel will also cover potential defenses to the penalties, including reasonable cause defenses.

James Gadwood will speak on the panel titled, "TCJA Impact on IRS Exams." This panel will explore how the TCJA will impact IRS examinations going forward, focusing on the LB&I campaign on section 965 transition tax and related TCJA planning issues. Panelists will also discuss other potential tax controversy hot topics post-TCJA, as well as how taxpayers and practitioners should prepare for such examinations.

George Hani will present the "BBA Update," a discussion on the latest developments, recent guidance, and IRS plans for the future of BBA.

Andrew Howlett, as part of a panel, will present "Passthrough On My Mind – Part 1," a discussion covering the significant partnership issues arising under sections 752 and 163(j), with a focus on recent guidance.

Loren Ponds* will present, "Diversity – Are Current Initiatives Working in the Public and Private Sector? Where Do We Go From Here?" The panel will discuss diversity and inclusion in the tax legal community and practical tips from our panelists' varied perspectives on what they've done to promote diversity, improve recruitment and retention, and address challenges to fostering diversity and inclusion within their organizations.

Ponds will also speak on the "Inbound Panel." The TCJA made significant changes to how inbound crossborder transactions are taxed. These changes and developments to the FATCA and information reporting rules will be discussed by the panel. As part of the discussion, the panel will discuss recently issued regulations and other guidance from the IRS and the Treasury Department impacting these transactions.

Erin Sweeney* will present, "Tax Issues When Employer Welfare Benefits Plans Include Wellness Program – What Works and What Doesn't." As insurers, third party administrators, and employers offer an increasing variety of health and wellness packages, the programs and menus of options present both old and new tax issues. This panel will discuss some of the common and developing wellness arrangements, relevant law and guidance to determine which benefits might be taxable, and other issues to consider

regarding any resulting reporting and tax liabilities.

**Former Miller & Chevalier attorney*

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