

MILLER & CHEVALIER PRESENTS: TAX CONTROVERSIES IN THE POST-SHELTER ERA

April 25, 2007 / Washington, D.C.

2007 TAX CONTROVERSY SEMINAR

An invitation-only seminar for leading corporate tax executives:

- Strategies for the new IRS audit paradigms
- Impact of tax shelter cases on tax planning
- Tax policy and the economic substance doctrine
- Resolving disputes administratively
- Tax litigation strategies in the post-shelter era

PANELISTS: Senior corporate executives, government officials and Miller & Chevalier tax professionals

KEYNOTE SPEAKER: Former IRS Commissioner Larry Gibbs

DATES & LOCATIONS

Reception: Tuesday, April 24 5:00 pm - 7:00 pm Miller & Chevalier 655 15th Street, NW, Suite 900 Washington, DC 20005 Seminar: Wednesday, April 25 8:00 am - 4:30 pm The Willard InterContinental Hotel 1401 Pennsylvania Avenue, NW Washington, DC 20004

ACCOMMODATIONS

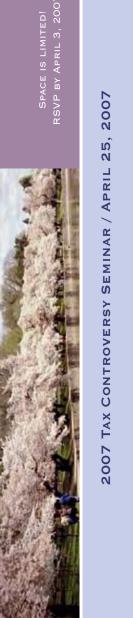
Contact the Willard Hotel at 202-628-9100 and request the Miller & Chevalier seminar rate. This room rate is available until April 3, 2007. Additional rooms are being held at the Marriott Metro Center, 775 12th Street, NW. Contact 202-737-2200 and request the Miller & Chevalier seminar rate before March 25, 2007.

TAX CONTROVERSY SEMINAR, APRIL 25, 2007

8:00-8:30	Complimentary Breakfast
8:30-8:45	Welcome and Introduction
8:45-10:00	 Strategies for the New IRS Audit Paradigms Understanding the post-shelter Exam environment: What has changed? Who are the players? How can taxpayers respond to new IRS tactics? Avoid pitfalls created by the shifting environment Protecting privilege and work product post-FIN 48
10:15-11:15	 Impact of Tax Shelter Cases on Mainstream Tax Planning Will the IRS apply tax shelter wins to other issues? Will courts limit IRS's application of economic sham theories? Strategies to minimize effects of recent cases on your tax planning
11:20-12:05	 Tax Policy and the Proposed Codification of the Economic Substance Doctrine (Michael Desmond, Tax Legislative Counsel, U.S. Treasury) (<i>invited</i>) Current climate emphasizes revenue raisers What can Congress gain from codification? What is the Administration's view?



12:15-1:30	Luncheon and Keynote Address: Tax Controversy in the Post-Shelter Era (Lawrence B. Gibbs, Miller & Chevalier member and former IRS Commissioner)
1:45-2:45	 Resolving Disputes Administratively Impact of currency initiative on case development and settlement Assessing options for resolving controversies at Exam Fast Track: How to take advantage of the unique Appeals – Exam dynamic What have the tax shelter wars done to Appeals independence?
3:00-4:15	 Tax Litigation in the Post-Shelter Era How tax shelter litigation affects non-shelter cases Preparing for litigation at the administrative level Protecting privilege before litigation Other tax shelter consequences: Discovery, FOIA, and summonses
4:15-4:30	Closing Keynote



Ashley Hutto at 202-626-5900 or events @ milchev.com No, I WILL NOT BE ABLE TO ATTEND, BUT PLEASE KEEP ME ON YOUR MAILING LIST. IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT:

HOW TO REGISTER

VIA MAIL

Miller & Chevalier 655 Fifteenth Street, N.W. Suite 900 Washington, DC 20005-5701

VIA E-MAIL

E-mail your registration to Ashley Hutto at events@milchev.com. In your e-mail, be sure to include the information listed on the registration form.

VIA PHONE

Please call Ashley Hutto at 202-626-5900.

VIA FACSIMILE

Please fax your response form to the attention of Ashley Hutto at 202-626-5801.

You will receive an e-mail confirmation of your registration.

Miller & Chevalier is pleased to present this interactive program at no cost to you or your company. Space is limited. For more information, call Ashley Hutto at 202-626-5900.

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