



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.



AGENDA

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)
(invited)

- 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

SPACE IS LIMITED!
RSVP BY APRIL 3, 2007

2007 TAX CONTROVERSY SEMINAR / APRIL 25, 2007

NAME _____ TITLE _____

COMPANY _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

PHONE _____ EMAIL _____

YES, I WILL ATTEND THE APRIL 24TH RECEPTION AT MILLER & CHEVALIER'S OFFICES.
ADDITIONAL GUESTS:

YES, I WILL ATTEND THE APRIL 25TH SEMINAR AT THE WILLARD INTERCONTINENTAL HOTEL.
 NO, I WILL NOT BE ABLE TO ATTEND, BUT PLEASE KEEP ME ON YOUR MAILING LIST.

IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT:
ASHLEY HUTTO AT 202-626-5900 OR EVENTS@MILCHEV.COM

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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