

# Federal Bar Association **TAX LAW** CONFERENCE 2015

**WASHINGTON, D.C. • FRIDAY, MARCH 6, 2015**

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## FRIDAY, MARCH 6

### **7:30 a.m.**

#### **Registration Desk Opens and Breakfast**

Ronald Reagan Building and International Trade Center  
1300 Pennsylvania Avenue, NW  
Washington, D.C.

### **8:00-8:10 a.m.**

#### **Welcoming Remarks**

Todd B. Reinstein, Partner, Pepper Hamilton LLP, Chair, Section on Taxation, Federal Bar Association

### **8:10-9:00 a.m.**

#### **Tax Legislative Update**

Marc J. Gerson, Member, Miller & Chevalier Chartered (Moderator)  
Floyd L. Williams, Senior Counsel, Public Strategies Washington, Inc. (Moderator)  
Thomas A. Barthold, Chief of Staff, Joint Committee on Taxation, U.S. Congress  
George Callas, Chief Tax Counsel (Majority), Committee on Ways and Means, U.S. House of Representatives  
Karen B. McAfee, Chief Tax Counsel (Minority), Committee on Ways and Means, U.S. House of Representatives  
Todd Metcalf, Chief Tax Counsel (Democratic staff), Committee on Finance, U.S. Senate  
Mark A. Prater, Republican Deputy Staff Director, Committee on Finance, U.S. Senate

### **9:00-9:30 a.m.**

#### **Featured Speaker:**

Caroline D. Ciruolo, Principal Deputy Assistant Attorney General and Deputy Assistant Attorney General for Policy and Planning, U.S. Department of Justice, Tax Division

### **9:30-10:00 a.m.**

#### **Featured Speaker:**

William J. Wilkins, Chief Counsel, Internal Revenue Service

### **10:15 a.m.-12:15 p.m.**

#### **Concurrent Symposia**

### **12:30-1:15 p.m.**

#### **Luncheon with Featured Speaker:**

Mark J. Mazur, Assistant Secretary for Tax Policy, U.S. Department of the Treasury

### **1:15-1:30 p.m.**

#### **Presentation of the Fifth Annual Donald C. Alexander Tax Law Writing Competition Awards**

Eleanor D. Wood, University of Minnesota Law School  
Brandon Cottrell, Syracuse University College of Law

### **1:45-3:45 p.m.**

#### **Concurrent Symposia**

### **4:00-6:00 p.m.**

#### **Ethics and the Federal Tax Practice**

### **6:00-8:00 p.m.**

#### **Reception and Presentation of the 2015 Kenneth H. Liles Award**

Shirley D. Peterson, Former Assistant Attorney General, U.S. Department of Justice, Tax Division, Former Commissioner of Internal Revenue, and Former Partner, Steptoe & Johnson LLP

- DC** Domestic Corporate Tax
- EC** Enforcement & Criminal Tax
- TA** Tax Accounting
- TP** Tax Practice & Procedure
- HT** Hot Topics
- EB** Employee Benefits & Executive Compensation
- IT** International Tax
- PP** Partnerships & Passthroughs
- YL** Young Tax Lawyers
- FP** Financial Products
- ET** Ethics

## 10:15 – 10:45 a.m.

- TA** **Worthless Stock Loss Guidance**  
**Room: Meridian DE**  
 Ellen McElroy, Partner, Pepper Hamilton (Moderator)  
 Susie Bird, Senior Counsel, Internal Revenue Service,  
 Office of Chief Counsel, Income Tax and Accounting  
*(Invited)*

Chris Kane, Branch Chief (Branch 3), Internal Revenue Service, Office of Chief Counsel, Income Tax and Accounting *(Invited)*  
 John Geracimos, Tax Managing Director, KPMG LLP

## 10:15 – 11:15 a.m.

- DC** **Section 355 Developments**  
**Room: Hemisphere A**  
 William D. Alexander, Former Associate Chief Counsel, Internal Revenue Service, Office of Chief Counsel, Corporate (Moderator)  
 Gerald B. Fleming, Senior Technician Reviewer, Internal Revenue Service, Office of Chief Counsel, Corporate  
 Derek Cain, Principal, PricewaterhouseCoopers LLP  
 Jay Singer, Partner, Ivins, Phillips & Barker Chartered  
 Eric Solomon, Director of National Tax Department, Ernst & Young LLP  
 Tom Wessel, Partner, KPMG LLP

**IT** **Inversions**  
**Room: Oceanic AB**  
 Daniel McCall, Special Counsel, Internal Revenue Service, Office of Chief Counsel, International *(Invited)*  
 Brenda Zent, Tax Law Specialist, U.S. Department of Treasury, Office of International Tax Counsel *(Invited)*  
 Chris Bowers, Partner, Skadden, Arps, Slate, Meagher & Flom LLP  
 Joseph Calianno, Partner, Grant Thornton LLP  
 Scott Levine, Partner, Jones Day
- EB** **Affordable Care Act (ends at 11:00 a.m.)**  
**Room: Hemisphere B**  
 Jonathan Zimmerman, Partner, Ivins, Phillips & Barker Chartered  
 Christa Bierma, Attorney Advisor, U.S. Department of Treasury, Office of Benefits Tax Counsel *(Invited)*  
 Kevin Knopf, Senior Technical Reviewer, Internal Revenue Service Office of Chief Counsel, Tax Exempt and Government Entities *(Invited)*  
 Stephen Tackney, Deputy Division Counsel/Deputy Associate Chief Counsel, Internal Revenue Service, Office of Chief Counsel, Tax Exempt and Government Entities *(Invited)*  
 Joanna Kerpen, Partner, McDermott Will & Emery LLP

**TP** **Recent Developments in IRS Examinations—Doing More with Less?**  
**Room: Atruim Hall A**  
 Elizabeth Askey, Principal, PricewaterhouseCoopers LLP (Moderator)  
 Nancy Knapp, Associate Area Counsel, Internal Revenue Service, Office of Chief Counsel, Large Business & International Division  
 Christopher Larsen, Director, Planning, Analysis, Inventory and Research, Internal Revenue Service, Large Business & International Division  
 Paul D. DeNard, Managing Director, PricewaterhouseCoopers LLP  
 Mary W. Prosser, Counsel, Miller & Chevalier Chartered
- EC** **Life of a Criminal Tax Case: Investigation**  
**Room: Polaris BC**  
 Jenny L. Johnson, Partner, Holland & Knight LLP (Moderator)  
 Richard Lungert, Deputy Division Counsel/Associate Chief Counsel (Criminal Tax), Internal Revenue Service  
 Richard Weber, Chief of Criminal Investigation, Internal Revenue Service  
 Larry Campagna, Shareholder, Chamberlain, Hrdlicka, White, Williams & Aughtry

**YL** **IRS Practice Nuts and Bolts: Audit, Appeal & Tax Litigation**  
**Room: Polaris A**  
 Adam Gropper, Legislation Counsel, Joint Committee on Taxation, U.S. Congress (Moderator)  
 Melissa Avrutine, Senior Technical Reviewer, Internal Revenue Service, Office of Chief Counsel, Procedure & Administration  
 Erin Healy Gallagher, Trial Attorney, U.S. Department of Justice, Tax Division  
 Brian C. Power, Associate, Mayer Brown LLP

## 10:45 – 11:15 a.m.

**TA Advance Payments Guidance**  
**Room: Meridian DE**  
 Leslie Schneider, Partner, Ivins, Phillips & Barker  
 Chartered (Moderator)  
 Peter Ford, Attorney (Branch 2), Internal Revenue Service,  
 Office of Chief Counsel, Income Tax and Accounting  
*(Invited)*

Tom Moffitt, Branch Chief (Branch 2), Internal Revenue  
 Service, Office of Chief Counsel, Income Tax and  
 Accounting *(Invited)*  
 Kenneth Beck, Tax Policy Advisor, U.S. Department of  
 Treasury *(Invited)*  
 Jennifer Kennedy, Partner, PricewaterhouseCoopers LLP

## 11:00 – 11:45 a.m.

**EB IRA Guidance/Qualified Plans**  
**Room: Hemisphere B**  
 Dominic Dematties, Attorney Advisor, U.S. Department  
 of Treasury, Office of Benefits Tax Counsel *(Invited)*  
 Victoria A. Judson, Associate Chief Counsel (TEGE),  
 Internal Revenue Service, Office of Chief Counsel,  
 Tax Exempt and Government Entities *(Invited)*  
 Linda Marshall, Senior Counsel, Internal Revenue  
 Service, Office of Chief Counsel, Tax Exempt and  
 Government Entities

Neil Sandhu, Attorney Advisor, Internal Revenue  
 Service, Office of Chief Counsel, Tax Exempt and  
 Government Entities *(Invited)*  
 Harlan Weller, Government Actuary, U.S. Department of  
 Treasury, Office of Benefits Tax Counsel  
 Rosina Barker, Partner, Ivins, Phillips & Barker  
 Chartered  
 Lisa Goyer, Senior Counsel, Husch Blackwell LLP  
 Steve Pavlick, Partner, McDermott, Will & Emery LLP

## 11:15 – 11:45 a.m.

**TA Updates to Procedural Guidance for Accounting  
 Method Changes**  
**Room: Meridian DE**  
 George Manousos, Tax Partner, PricewaterhouseCoopers  
 LLP (Moderator)  
 Grant Anderson, Senior Counsel (Branch 7), Internal  
 Revenue Service Office of Chief Counsel, Income Tax  
 and Accounting *(Invited)*  
 Alexa Claybon, Attorney-Advisor, U.S. Department of  
 Treasury, Office of Tax Legislative Counsel *(Invited)*

Chris Call, Attorney (Branch 6), Internal Revenue Service,  
 Office of Chief Counsel, Income Tax and Accounting  
*(Invited)*  
 Karla Meola, Assistant to the Branch Chief (Branch 7),  
 Internal Revenue Service, Office of Chief Counsel,  
 Income Tax and Accounting *(Invited)*  
 David B. Auclair, National Managing Principal, Washington  
 National Tax Office, Grant Thornton LLP

## 11:15 a.m. – 12:15 p.m.

**DC Rehabilitating Troubled Corporations**  
**Room: Hemisphere A**  
 Robert Liquerman, Principal, KPMG LLP (Moderator)  
 Krishna Vallabhaneni, Attorney-Advisor, U.S.  
 Department of the Treasury, Office of Tax  
 Legislative Counsel *(Invited)*  
 Jonathan Forrest, Principal, Deloitte Tax LLP  
 Christine Lane, Associate, Hogan Lovells LLP  
 Todd B. Reinstein, Partner, Pepper Hamilton LLP

Mark E. Matthews, Member, Caplin & Drysdale,  
 Chartered  
 Thomas E. Zehnle, Member, Miller & Chevalier  
 Chartered

**EC Life of a Criminal Tax Case: Litigation**  
**Room: Polaris BC**  
 Jay Nanavati, Counsel, Baker Hostetler LLP (Moderator)  
 Rebecca Perlmutter, Counsel to Acting Deputy  
 Assistant Attorney General for Criminal Matters,  
 U.S. Department of Justice, Tax Division

**TP Resolving Cases at Today's Appeals**  
**Room: Atrium Hall A**  
 George A. Hani, Member, Miller & Chevalier Chartered  
 (Moderator)  
 Kirsten Wielobob, Chief, Appeals, Internal Revenue  
 Service  
 Fred F. Murray, Managing Director, Tax Accounting, Risk  
 Advisory, and International Tax Services, Grant  
 Thornton LLP  
 Ruth Perez, Principal, PricewaterhouseCoopers LLP

**11:15 a.m. – 12:15 p.m. (continued)**

**YL**

**How to Succeed as a Tax Lawyer**

**Room: Polaris A**

Adam Gropper, Legislation Counsel, Joint Committee on Taxation, U.S. Congress (Moderator)  
 Hon. Cary D. Pugh, Judge, U.S. Tax Court  
 Jared Hermann, Manager, PricewaterhouseCoopers LLP, Washington National Tax Services (International Tax/Financial Products)  
 Sam Kamyans, Associate, Vinson & Elkins LLP  
 Floyd L. Williams, Senior Counsel, Public Strategies Washington, Inc.

**IT**

**Recent Developments**

**Room: Oceanic AB**

Anne Devereaux, Deputy Associate Chief Counsel, Internal Revenue Service, Office of Chief Counsel, International (*Invited*)  
 Elena Virgadamo, Attorney-Advisor, U.S. Department of Treasury, Office of International Tax Counsel (*Invited*)  
 Robert Goulder, Tax Analysts  
 Alan W. Granwell, Of Counsel, Sharp Partners PA  
 Jeff Korenblatt, Partner, Reed Smith LLP

**11:45 a.m. – 12:15 p.m.**

**EB**

**Employment Tax - Enforcement Activity**

**Room: Hemphire B**

Paul Carlino, Branch Chief, Internal Revenue Service, Office of Chief Counsel, Tax Exempt and Government Entities (*Invited*)  
 Janine Cook, Deputy Division Counsel/Deputy Associate Chief Counsel, Internal Revenue Service, Office of Chief Counsel, Tax Exempt and Government Entities (*Invited*)  
 Ruth Wimer, Partner, McDermott, Will & Emery LLP

**TA**

**Current Developments**

**Room: Meridian DE**

Christian Wood, Principal, McGladrey LLP (Moderator)  
 Andrew Keyso, Associate Chief Counsel, Internal Revenue Service, Office of Chief Counsel, Income Tax and Accounting (*Invited*)  
 Kenneth Beck, Tax Policy Advisor, U.S. Department of Treasury (*Invited*)  
 Robert Kilinskis, Managing Partner, Deloitte Tax LLP  
 Scott Vance, Principal, KPMG LLP

**Federal Bar Association**  
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 CONFERENCE **2016**

**Ronald Reagan Building and International Trade Center  
 1300 Pennsylvania Avenue, NW, Washington, D.C.**

**SAVE THE DATE • FRIDAY, MARCH 4, 2016**

1:45 – 2:45 p.m.

**DC** **Affiliated Corporations and Consolidated Returns**  
**Room: Hempshire A**  
 Joseph Pari, Principal, KPMG LLP (Moderator)  
 Larry Axelrod, Special Counsel to the Associate Chief Counsel, Internal Revenue Service, Office of Chief Counsel, Corporate  
 Bryan Collins, Partner, Deloitte Tax LLP  
 Gregory N. Kidder, Partner, Steptoe & Johnson LLP  
 Robert Wellen, Partner, Ivins, Phillips & Barker Chartered

**EC** **International Tax Enforcement Issues**  
**Room: Polaris BC**  
 Fred F. Murray, Managing Director, Tax Accounting, Risk Advisory, and International Tax Services, Grant Thornton LLP (Moderator)  
 Eric Hylton, Director of International Operations, Internal Revenue Service  
 Larry Wszalek, Acting Deputy Assistant Attorney General for Criminal Matters, U.S. Department of Justice, Tax Division  
 Alan W. Granwell, Of Counsel, Sharp Partners PA

**PP** **Partnerships**  
**Room: Meridian DE**  
 Frank Fisher, Attorney-Advisor, Internal Revenue Service, Office of Chief Counsel Passthroughs & Special Industries (*Invited*)  
 Craig Gerson, Attorney-Advisor, U.S. Department of Treasury, Office of Tax Legislative Counsel (*Invited*)  
 Caroline Hay, Attorney-Advisor, Internal Revenue Service, Office of Chief Counsel, Passthroughs & Special Industries (*Invited*)  
 Ben Weaver, Attorney-Advisor, Internal Revenue Service, Office of Chief Counsel, Passthroughs & Special Industries (*Invited*)  
 Bob Crnkovich, Partner, Ernst & Young LLP  
 David Sherwood, Partner, Ivins, Phillips & Barker Chartered

**TP** **Hot Topics in Refund Litigation—Recurring Problems, Special Issues in Backruptcy Cases, Current Trends, and Judicial Prespectives**  
**Room: Atruim Hall A**  
 Alex E. Sadler, Partner, Ivins, Phillips & Barker Chartered (Moderator)  
 Hon. Victor J. Wolski, Judge, U.S. Court of Federal Claims  
 Joseph Sergi, Senior Litigation Counsel, U.S. Department of Justice, Tax Division  
 Christopher S. Rizek, Partner, Caplin & Drysdale, Chartered  
 Andrew C. Strelka, Counsel, Miller & Chevalier Chartered

**HT** **Section 280E: Tax Implications for Marijuana Businesses**  
**Room: Polaris A**  
 Mark C. Milton, Associate, Husch Blackwell LLP (Moderator)  
 Thomas McElroy, Senior Technician Reviewer, Internal Revenue Service, Office of Associate Chief Counsel, Income Tax & Accounting  
 Henry Wykowski, Henry G. Wykowski & Associates

**IT** **Section 956—Issues and Developments**  
**Room: Oceanic AB**  
 John Merrick, Special Counsel to the Associate Chief Counsel, Internal Revenue Service, Office of Chief Counsel, International  
 Douglas Poms, Deputy International Tax Counsel (Acting), U.S. Department of the Treasury, Office of International Tax Counsel (*Invited*)  
 John D. Bates, Partner, Baker & Hostetler LLP  
 J. Brian Davis, Partner, Ivins, Phillips & Barker Chartered

**FP** **Cross-Border Dividend Equivalent Payment Withholding**  
**Room: Hempshire B**  
 Mark Leeds, Partner, Mayer Brown LLP (Moderator)  
 Viva Hammer, Legislation Counsel, Joint Committee on Taxation, U.S. Congress  
 Matthew Stevens, Principal, Ernst & Young LLP

2:45 – 3:45 p.m.

**DC** **Recent Corporate Tax Developments**  
**Room: Hempshire A**  
 David I. Kempler, Shareholder, Buchanan Ingersoll & Rooney PC (Moderator)  
 Erik Corwin, Deputy Chief Counsel, Technical, Internal Revenue Service, Office of Chief Counsel  
 Layla J. Aksakal, Member, Miller & Chevalier Chartered  
 Philip J. Levine, Partner, McDermott, Will & Emery LLP  
 Gordon Warnke, Partner, Linklaters LLP

**EC** **Hot Topics**  
**Room: Polaris BC**  
 Charles Rettig, Partner, Hochman, Salkin, Rettig, Toscher & Perez, PC (Moderator)  
 Caroline D. Ciraolo, Principal Deputy Assistant Attorney General and Deputy Assistant Attorney General for Policy and Planning, U.S. Department of Justice, Tax Division  
 David J. Curtin, Partner, Morgan, Lewis & Bockius LLP  
 Matthew C. Hicks, Member, Caplin & Drysdale, Chartered



2:45 – 3:45 p.m. (continued)

**IT** **Transfer Pricing**  
**Room: Oceanic AB**  
 Robert “Zeb” Kelley, Attorney (Branch 6), Internal Revenue Service, Office of Chief Counsel, International  
 Michael McDonald, Financial Economist (Business and International Taxation), U.S. Department of the Treasury, Office of Tax Analysis *(Invited)*  
 Robert J. Kovacev, Partner, Steptoe & Johnson LLP  
 Richard Slowinski, Partner, Baker & McKenzie LLP

**PP** **S Corporations**  
**Room: Meridian DE**  
 Caroline Hay, Attorney-Advisor, Internal Revenue Service, Office of Chief Counsel, Passthroughs & Special Industries *(Invited)*  
 Stacy Short, Senior Technician Reviewer, Internal Revenue Service, Office of Chief Counsel, Passthroughs & Special Industries *(Invited)*  
 Benjamin Willis, Attorney-Advisor, U.S. Department of Treasury, Office of Tax Legislative Counsel *(Invited)*  
 Laura Howell-Smith, Director, Deloitte Tax LLP  
 Cornelia J. Schnyder, Managing Director, Andersen Tax LLC

**TP** **Equitable Doctrines in Tax Litigation**  
**Room: Atrium Hall A**  
 Edward L. Froelich, Of Counsel, Morrison & Foerster LLP (Moderator)  
 Hon. David Gustafson, Judge, U.S. Tax Court

Greg Armstrong, Senior Technical Reviewer, Internal Revenue Service, Office of Chief Counsel, Procedure & Administration  
 Sean M. Akins, Associate, Latham & Watkins LLP  
 Nathan E. Clukey, Partner, King & Spalding LLP

**HT** **Update on the Status of the IRS Whistleblower Program, Whistleblower Litigation in the U.S. Tax Court, and Protecting Taxpayer and Whistleblower Information**  
**Room: Polaris A**  
 Scott A. Knott, Tax Partner, The Ferraro Law Firm, PA (Moderator)  
 Kevin Gillin, Special Counsel, Internal Revenue Service, Office of Chief Counsel, Small Business/Self-Employed *(Invited)*  
 Robert Wearing, Branch Chief, Internal Revenue Service, Office of Chief Counsel, Procedure & Administration *(Invited)*  
 George Clarke, Partner, Baker & McKenzie LLP

**FP** **Derivatives Involving Master Limited Partnerships**  
**Room: Hemphshire B**  
 Mark Leeds, Partner, Mayer Brown LLP (Moderator)  
 Petya Kirilova, Senior Manager, Ernst & Young LLP  
 Anthony Tutts, Partner, Withum Smith & Brown PC

4:00 – 6:00 p.m.

**ET** **Ethics and the Federal Tax Practice**  
**Room: Atrium Hall A**  
 Drita Tonuzi, Associate Chief Counsel (Procedure and Administration), Internal Revenue Service  
 Fred F. Murray, Managing Director, Tax Accounting, Risk Advisory, and International Tax Services, Grant Thornton LLP

Roland Barral, Senior Advisor, Tax Controversy and Litigation, Skadden, Arps, Slate, Meagher & Flom LLP  
 Charles J. “Chad” Muller, Shareholder, Chamberlain, Hrdlicka, White, Williams & Aughtry  
 Eileen Shatz, Counselor to the Assistant Attorney General, U.S. Department of Justice, Tax Division

# TAX LAW CONFERENCE 2015

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## PROGRAM CO-CHAIRS

### TAX LEGISLATIVE UPDATE

Marc J. Gerson, Member, Miller & Chevalier Chartered  
Floyd L. Williams, Senior Counsel, Public Strategies  
Washington, Inc.

### DOMESTIC CORPORATE TAX

William D. Alexander, Former Associate Chief Counsel, Internal  
Revenue Service, Office of Chief Counsel, Corporate  
David I. Kempler, Shareholder, Buchanan Ingersoll & Rooney PC  
Robert Liquerman, Principal, KPMG LLP  
Joseph Pari, Principal, KPMG LLP

### EMPLOYEE BENEFITS & EXECUTIVE COMPENSATION

Kyle Brown, Attorney, Internal Revenue Service, Office of Chief  
Counsel, Tax Exempt and Government Entities (*Invited*)  
Ruth Wimer, Partner, McDermott, Will & Emery LLP

### ENFORCEMENT & CRIMINAL TAX

Ted Cronin, Division Counsel/Associate Chief Counsel (Criminal  
Tax), Internal Revenue Service  
Mark E. Matthews, Member, Caplin & Drysdale, Chartered  
Scott D. Michel, Member, Caplin & Drysdale, Chartered

### FINANCIAL PRODUCTS

Helen Hubbard, Associate Chief Counsel, Internal Revenue  
Service, Office of Chief Counsel, Financial Institutions &  
Products (*Invited*)  
Mark Leeds, Partner, Mayer Brown LLP

### INTERNATIONAL TAX

John Merrick, Special Counsel to the Associate Chief Counsel,  
Internal Revenue Service, Office of Chief Counsel,  
International  
Joseph Calianno, Partner, Grant Thornton LLP  
Jeff Korenblatt, Partner, Reed Smith LLP  
Richard Slowinski, Partner, Baker & McKenzie LLP

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Revenue Service, Office of Chief Counsel, Passthroughs &  
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Paul F. Kugler, Director, KPMG LLP  
Karen F. Turk, Partner, Goodwin Procter LLP

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Attorneys admitted to state bars having mandatory CLE requirements should so indicate on the registration form so that this program can be filed for accreditation in the appropriate jurisdictions. State CLE approvals pending. Credits requested for 60 minute credit hour states: Max 8 / Ethics 2

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### SECTION 280E: TAX IMPLICATIONS FOR MARIJUANA BUSINESSES

Thomas McElroy, Senior Technician Reviewer, Internal  
Revenue Service, Office of Associate Chief Counsel,  
Income Tax & Accounting  
Henry Wykowski, Henry G. Wykowski & Associates

### TAX ACCOUNTING

Andrew Keyso, Associate Chief Counsel, Internal Revenue  
Service, Office of Chief Counsel, Income Tax and  
Accounting  
Ellen McElroy, Partner, Pepper Hamilton LLP

### TAX PRACTICE & PROCEDURE

Thomas Kane, Tax Exempt and Government Entities Division  
Counsel, Internal Revenue Service  
Elizabeth Askey, Principal, PricewaterhouseCoopers LLP  
George A. Hani, Member, Miller & Chevalier Chartered  
Gerald A. Kafka, Partner, Latham & Watkins LLP

### UPDATE ON THE STATUS OF THE IRS WHISTLEBLOWER PROGRAM

Robert Wearing, Branch Chief, Internal Revenue Service, Office of  
Chief Counsel, Procedure and Administration (*Invited*)  
Scott A. Knott, Tax Partner, The Ferraro Law Firm, PA

### YOUNG TAX LAWYERS

Adam Gropper, Legislation Counsel, Joint Committee on  
Taxation, U.S. Congress  
Brian C. Power, Associate, Mayer Brown LLP

### ETHICS AND THE FEDERAL TAX PRACTICE

Drita Tonuzi, Associate Chief Counsel, Internal Revenue  
Service, Office of Chief Counsel, Procedure &  
Administration  
Fred F. Murray, Managing Director, Tax Accounting, Risk Advisory,  
and International Tax Services, Grant Thornton LLP

### PRESENTATION OF THE FIFTH ANNUAL DONALD C. ALEXANDER TAX LAW WRITING COMPETITION AWARDS

Anne R. Gordon, Law Clerk to Hon. Tamara W. Ashford, U.S.  
Tax Court  
Robert Russell, Counsel, Joint Committee on Taxation

### RECEPTION AND PRESENTATION OF THE 2015 KENNETH H. LILES AWARD

Immediate Past Chair: Andrew C. Strelka, Counsel, Miller &  
Chevalier Chartered

may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN 37219-2417. Website: [www.nasba.org](http://www.nasba.org). Prerequisite: None; Program Level: Beginner; Advance prep: None. Credit hours: 10 hours; Delivery method: Group live

### Ronald Reagan Building and International Trade Center

The Ronald Reagan Building and International Trade Center is located at 1300 Pennsylvania Avenue NW. The Federal Triangle METRO stop (orange/blue/silver lines) is located onsite, and the Metro Center METRO stop (red line) is just two blocks away. For drivers, an underground garage provides parking for \$23 a day or less, depending on the number of hours parked.