70th Annual Taxation Conference: Day 1 - Controversy
November 30, 2022 • DoubleTree by Hilton Hotel Austin • Austin, TX
November 30, 2022 • Live Webcast

Wednesday Morning, Nov. 30, 2022

Presiding Officer:
T. Charles Parr III, ABIP, P.C. - San Antonio, TX

7:30 am In Austin Only	**Registration Opens** Includes continental breakfast.
8:20 am	**Welcoming Remarks**
8:30 am 2.00 hrs	**Recent Developments** Review significant court decisions, rulings, and statutory and regulatory developments of the past year. Bruce A. McGovern, South Texas College of Law Houston - Houston, TX
10:30 am	**15-Minute Break**
10:45 am 0.50 hr	**Texas Taxes: Recent Developments** An experienced trial attorney specializing in Texas taxes covers the new laws for challenging tax assessments in state court, research incentive issues, oilfield services audit policy changes, franchise tax apportionment issues, local sales tax sourcing for internet sales, and more. Lacy Leonard, Martens, Todd, & Leonard - Austin, TX
11:15 am 1.00 hr 0.25 hr ethics	**Multistate SALT Issues and Business Migration** Navigating multistate tax compliance post-*Wayfair* including business migrations to Texas, remote worker issues, and transactional considerations. Christina A. Mondrik, Mondrik & Associates - Austin, TX Steven D. Moore, Jackson Walker LLP - Austin, TX
12:15 pm In Austin Only	**Pick Up Lunch (in Austin)** Included in registration.

Wednesday Afternoon, Nov. 30, 2022

Presiding Officer:
Jimmy Martens, Martens, Todd, & Leonard - Austin, TX

LUNCHEON PRESENTATION

Introduction

Maxine Aaronson, Attorney at Law - Dallas, TX

12:45 pm 1.00 hr ethics	**Identifying Emerging Issues at the IRS** A view from inside the agency about how the IRS keeps up with emerging tax noncompliance and tax fraud issues and an introduction to the new IRS Joint Strategic Emerging Issues Team. Tom Cullinan, Office of the Commissioner, Internal Revenue Service - Washington, DC Holly Porter, Passthroughs & Special Industries, Office of Chief Counsel, Internal Revenue Service - Washington, DC
1:45 pm	**15-Minute Break**
2:00 pm 1.00 hr 0.25 hr ethics	**How Firm are Court Filing Deadlines in Tax Cases?** Earlier this year, the Supreme Court rejected the IRS's position that the 30-day deadline for filing a Tax Court petition in a Collection Due Process case is "jurisdictional" and therefore not subject to equitable tolling. The decision follows a recent trend in Supreme Court jurisprudence and its potentially far-reaching consequences in Tax Court cases is already being litigated. Former IRS Chief Counsel Mike Desmond explains and evaluates the breadth of the decision, potential government responses, and the ramifications of this important development in other areas of the tax law. Michael J. Desmond, Gibson, Dunn & Crutcher LLP - Los Angeles, CA
3:00 pm 1.00 hr 0.25 hr ethics	**Dealing with Sticky Situations: Overbroad IDRs, Requests for Client Interviews, and Other Tricky Audit Situations** With the IRS laser-focused on enforcement, many taxpayers may find themselves subject to an intrusive audit. These audits can involve tricky situations like client interviews, broad IDRs, site tours, and acknowledgment of facts IDRs. These speakers discuss best practices and considerations in handling these tricky situations, as well as the importance of civility in interactions with the IRS. Mary A. McNulty, Holland & Knight LLP - Dallas, TX Lee Meyercord, Holland & Knight - Dallas, TX
4:00 pm	**10-Minute Break**
4:10 pm 1.00 hr ethics	**Keeping Your Clients Out of Hot Water: Drafting Effective Tax Return Disclosures** A well-drafted disclosure statement can provide more penalty protection than a tax opinion letter. This skill-building session teaches you how to improve the disclosures you write to manage audit risk and limit penalties. Lawrence Sannicandro, McCarter & English, LLP - Newark, NJ
5:10 pm	**Adjourn**

5:15 pm In Austin Only	**Networking Reception (in Austin from 5:10 p.m. – 6:10 p.m.)** Join us for drinks and hors d'oeuvres with program faculty and attendees. **Thank You to Our Sponsor** abip CPAs | ADVISORS