



The 1st Annual Tax Controversy Forum

November 3, 2009
Sinclair Community College



**EXPERT
PANELS**



**REGISTER
TODAY!**

SOLVE THE TAX CONTROVERSY PUZZLE!

Tax practitioners are seeing a sharp increase in tax controversies and disputes. That trend will only continue as the IRS and state governments gear up for increased collection activities.

The 1st Annual Tax Controversy Forum will provide you with a broad view of the tax collection process and the key areas of controversies and disputes. Come learn from experienced tax practitioners, including tax attorneys, CPAs, and representatives from the State of Ohio, Internal Revenue Service agents, Appeals officers, and criminal investigators.



November 3, 2009

8:30 – 5:00 (lunch included)

**SINCLAIR COMMUNITY COLLEGE
(Ponitz Center)**

444 West Third St., Dayton, OH

Approved for 6.75 hours Ohio CLE and CPE

WHO SHOULD ATTEND?

Any attorney, accountant,
enrolled agent, or person
who represents taxpayers
in state or federal tax
matters.

Register today by visiting this web site or
completing the form on the back of this page



www.quantumlegal.com

REGISTRATION

REGISTER BY MAIL OR FAX:

Name _____
Firm or Company _____
Address _____
City _____ State _____
Zip _____ Phone _____
Email: _____

REGISTER ONLINE TOO!
Visit www.quantumlegal.com

Registration Fee of \$225 payable by check or credit card

Method of Payment:

- Pay online at www.quantumlegal.com
 Check Enclosed Credit Card

Card # _____ Exp. Date _____

Name on Card: _____

- Mastercard VISA

FAX TO: (937)228-2816

SEND TO: Quantumlegal
c/o Taft Stettinius & Hollister
110 North Main, Ste. 900
Dayton, OH 45402

Taft/

8:00 - 8:30 REGISTRATION- CONT. BREAKFAST

8:30 - 9:15 THE FUTURE OF FEDERAL TAX ADMINISTRATION AND COLLECTION

Learn about recent changes, current proposals, and tax policy considerations likely to impact federal tax administration and collection in the future.

9:15 - 10:00 OHIO'S NEW STATUTE OF LIMITATIONS ON COLLECTIONS

In 2006, the Ohio General Assembly passed House Bill 390 creating a new statute of limitations on tax collections, effective September 28, 2009. Learn how the new statute of limitations applies to various taxes and become familiar with the key exceptions.

Moderator: **CHAD HANSEN**, Taft Stettinius & Hollister

Panelists: MERLE WILBERDING, Coolidge Wall
Taft/ LUCAS WARD, Ohio Attorney General's Office
JAMES LAWRENCE, Zaino & Humphrey

10:00 - 10:15 MORNING BREAK

10:15 - 11:00 STATE OF OHIO AUDIT AND COLLECTION ISSUES

This panel will discuss the latest State of Ohio audit initiatives, and collection issues. There will also be discussion of settlement alternatives and procedures.

Moderator: JAMES LAWRENCE, Zaino & Humphrey
Panelists: RICK ANTHONY, Deputy Tax Commissioner for Audit and Compliance, Ohio Department of Taxation
MARGE BREWER, Executive Administrator Appeals Management, Office of Chief Counsel

11:00 - 12:00 MANAGING AN AUDIT AND HEADING TO APPEALS

Learn how to effectively manage an audit to minimize further controversy and litigation. This panel will also discuss how to prepare your case for IRS Appeals, including utilizing mediation and arbitration measures.

Moderator: DAVID G. HARRIS, Ernst & Young Tax Controversy and Risk Management Services, Columbus, Ohio
Panelists: Speaker from IRS Audit Division
Speaker from IRS Appeals

12:00 - 1:15 LUNCH AND KEYNOTE ADDRESS BY OHIO TAX COMMISSIONER RICHARD A. LEVIN

1:15 - 2:30 THE CRIMINAL TAX CASE

Learn what to do when a client, or you as the tax practitioner, faces criminal investigation or prosecution. This panel will discuss the keys in identifying and properly handling criminal tax issues in any engagement.

Moderator: **GREGORY LOCKHART**, Taft Stettinius & Hollister

Panelists: Speaker, IRS Criminal Investigation Division
Taft/ **LANCE A. GILDNER**, Taft Stettinius & Hollister
RALPH KOHNEN, Taft Stettinius & Hollister

2:30 - 3:15 TRUST FUND PENALTY CASES

There is a new push to criminally prosecute responsible parties. This panel will address the key issues in defending a trust fund penalty case, both civil and criminal, and how to implement business procedures to protect against a responsible party assessment.

Moderator: **CHAD HANSEN**, Taft Stettinius & Hollister

Panelists: MARK FEUER, Dinsmore & Shohl
Taft/ Speaker, U.S. Department of Justice Tax Division

3:15 - 3:30 AFTERNOON BREAK

3:30 - 5:00 WHEN DOES TAX PLANNING BECOME TAX FRAUD?

There can be a very fine line at times between tax planning and tax fraud. Listen to this panel discuss the keys in determining when tax planning may be going too far. With an increase in criminal prosecutions, it is crucial for the tax practitioner to avoid implications of tax fraud and protect clients from prosecutions.

Moderator: **LANCE GILDNER**, Taft Stettinius & Hollister

Panelists: Speaker, IRS Criminal Investigation Division
Taft/ **GREGORY LOCKHART**, Taft Stettinius & Hollister
MICHAEL CRITES, Dinsmore & Shohl

5:00 CONCLUSION OF TAX CONTROVERSY FORUM