TAXATION



CALIFORNIA LAWYERS ASSOCIATION TAXATION SECTION



7TH ANNUAL YOUNG TAX LAWYERS CONFERENCE

Education, Professional Development, Reinforcement of Your Inspired Idea to Become a Tax Lawyer

APRIL 17, 2020 UC Irvine School of Law

401 E. Peltason Dr., EDU 1131 Irvine, California, 92697

PROGRAM SCHEDULE

REGISTRATION

11:30AM - 4:30PM

WELCOME - NETWORKING LUNCHEON

12:00PM - 12:30PM

OPENING REMARKS FROM PAULA BRUNORO

12:30PM - 12:45PM

REMARKS FROM ADRIA PRICE REGARDING CLA TAXATION SECTION

12:45PM - 1:00PM

IRS AUDIT: FROM EXAM TO TAX COURT

1:00PM - 2:00PM

The program will provide guidance to young lawyers entering the field of tax litigation practice. The panel will provide a roadmap on how to navigate the procedural rules when representing clients in tax matters, and best practices for lawyers. The program will start off covering the main types of IRS examinations, how to proceed with each type of examination, statute of limitation issues, and the closing of each type of exam. Upon the conclusion of the IRS exam, the next portion of the program will cover the appeals process for unagreed cases. The program will also review proceeding to Tax Court for unagreed cases where Notice of Deficiency has been issued. The panel will share tips on exam strategies, how to proceed with 5th amendment issues, and ethical considerations.

SPEAKERS: Ani Galyan & Jonathan Armitrano

BREAK

2:00PM - 2:15PM

TAX COLLECTIONS – WHEN BANKRUPTCY MAY BE A BETTER OPTION

2:15PM - 3:15PM

When providing a client with a comprehensive strategy to resolve their tax issues, there are times that your client may be better off going into bankruptcy. This presentation will discuss bankruptcy considerations from a tax controversy practitioner's perspective and how such a tool can be helpful to your clients. This presentation will provide an introduction into what analysis is needed to determine whether bankruptcy may be a better option for your client or when it may not be an option for your client. Timing is key in this area and it is important to understand common pitfalls in this area.

SPEAKER: Lisa Nelson

BREAK

3:15PM - 3:30PM

RIPPED FROM THE HEADLINES: HOW NOT TO PRACTICE TAX LAW FROM THOSE THAT SHOULD HAVE KNOWN BETTER. (1.0 HOUR LEGAL ETHICS)

3:30PM - 4:30PM

This presentation will take real life examples of tax practitioners behaving badly, who have run afoul of various legal and ethical rules, and dissect what they did wrong and why. Circular 230, ABA Model Rules of Professional Conduct and the California Rules of Professional Rules of Professional Rules of Professional Conduct will be discussed. This presentation is a must for any practitioner wanting to keep their law or accounting license!

SPEAKERS: Adria Price & Kim Nguyen

NETWORKING RECEPTION AT THE UCI SCHOOL OF LAW COURTYARD

4:30PM - 6:00PM

A SPECIAL THANKS TO OUR SPONSORS FOR THEIR GENEROUS CONTRIBUTIONS:

DIAMOND SPONSORS THE LAW OFFICES OF HOCHMAN SALKIN TOSCHER PEREZ P.C. THE LAW OFFICES OF A. LAVAR TAYLOR WAGNER KIRKMAN BLAINE KLOMPARENS & YOUMANS, LLP

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> VENUE SPONSOR UC IRVINE SCHOOL OF LAW

RECEPTION SPONSOR ORANGE COUNTY YOUNG TAX LAWYERS (OCYTL) COMMITTEE



REGISTRATION INFORMATION

CANCELLATIONS/REFUND POLICY:

Cancellations and requests for refunds must be received in writing no later than April 10, 2020 and are subject to a \$50 service charge. Refunds will not be available after April 10, 2020.

QUESTIONS:

For registration information call 916-516-1757. Telephone registrations will not be accepted. For program content and/or Section information call 916-516-1754.

SPECIAL ASSISTANCE:

For special assistance, please call 916-516-1754.

ON-SITE:

On-site registration will be on a space available basis. Call to confirm space availability.

PHOTO RELEASE:

This event may be recorded. By attending this event, you consent to be photographed, filmed, and/or otherwise recorded, and to any use, by the CLA, of your likeness, voice, and name in any and all media including social media. If you do not want your name or photo to be used, please let us know in advance. We cannot, however, honor requests to opt out of the use of your image or voice if you choose to ask a question during one of the event sessions.



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REGISTRATION FORM

Note: One registrant per form. Photocopies may be used.

| Bar Number: | |
|----------------|-----------------------------------|
| Name: | |
| | |
| | |
| | Zip Code: |
| Phone Number: | |
| Email Address: | |
| | (Required for email confirmation) |

Emergency Contact Information

Name:_

Phone Number: _

Program package includes 3.0 hours of MCLE, legal specialization in Taxation Law and 1.0 hour Legal Ethics, program materials, continental breakfast and lunch.

REGISTRATION FEES (check the appropriate circle)

- O \$40 Student
- 0 \$65 Young Tax Lawyer Member */Government Attorney
- 0 \$90 Taxation Section Member
- 0 **\$115** Non-Section Member

* Young Tax Lawyer Members are current paid members of the Taxation Section of the California Lawyers Association who are either under 36 years of age or are in their first 8 years of practicing law.

**Onsite registration fee is \$125 for anyone registering the day of the conference.

TOTAL: \$_____ Amount Enclosed/To Be Charged

REGISTRATION INFORMATION

| DEADLINE: | In order to pre-register, your form and check, payable to California Lawyers Association, or credit card information, must be received by April 10, 2020. |
|--------------------------|---|
| REGISTER ONLINE : | CALAWYERS.ORG/TAXATION |
| MAIL TO: | Program Registrations, California Lawyers Association 400 Capitol Mall, Suite 650, Sacramento, CA 95814 |
| EMAIL TO: | Program Registrations at ProgramRegistrations@CAlawyers.org. In order to email your registration, credit card information is MANDATORY. (Photocopies of checks will NOT be accepted.) |

CREDIT CARD INFORMATION (VISA/MASTERCARD ONLY)

I authorize California Lawyers Association to charge my program registration to my VISA/ MasterCard account. **(No other credit card will be accepted.)**

| Account Number: | |
|-------------------------|---------------------------|
| Expiration Date: | (VISA or MasterCard only) |
| Cardholder's Name: | |
| Cardholder's Signature: | |

California Lawyers Association is an approved State Bar of California MCLE providers.

TAXATION

CALIFORNIA LAWYERS ASSOCIATION

CALIFORNIA LAWYERS 400 Capitol Mall, Suite 650 ASSOCIATION Sacramento, CA 95814

7th annual Young Tax Lawyers Conference

APRIL 17, 2020 UC IRVINE SCHOOL OF LAW

UC IKVINE SCHOOL OF LA 401 E. Peltason Dr., EDU 1131 Irvine, California, 92697 Earn 3.0 Hours MCLE Credit Includes legal specialization and 1.0 Hour of legal ethics

REGISTER ONLINE: CALAWYERS.ORG/TAXATION



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