

2025 D.C. Bar Tax Conference

January 15-16, 2025

Presented by: D.C. Bar Taxation Community

Hosted by:

**The District of Columbia Bar
901 4th Street, NW
Washington, D.C., 20001**

Conference Co-Chairs

Caroline Ciralo, Partner, Kostelanetz LLP
Adjunct Professor of Law, The Georgetown University Law Center

Eric Solomon, Partner, Ivins, Phillips & Barker, Chartered
Adjunct Professor of Law, The Georgetown University Law Center

Conference Vice Chair

Amy Elliott, Senior Practice Attorney
Akin Gump Strauss Hauer & Feld LLP

AGENDA

DAY 1

8:30 a.m. to 9:00 a.m. Registrant Check-in and Breakfast

9:00 a.m. to 9:15 a.m. Welcome

9:15 a.m. to 10:25 a.m. Breakout Session 1

International Taxation: Hot Topics Part I

MODERATOR: Loren Ponds, Member, Miller & Chevalier Chartered

PANELISTS:

- Paul Crispino, Attorney-Advisor, Office of Tax Policy, U.S. Department of the Treasury
- Rebecaa Lee, Principal, PricewaterhouseCoopers LLP
- Shane McCarrick, Special Counsel, Office of Associate Chief Counsel (International), Internal Revenue Service
- Gretchen Sierra, Principal, Deloitte Tax LLP

Corporate Taxation: Taxation of Troubled Companies

MODERATOR: Joe Pari, Partner, Weil, Gotshal & Manges LLP and Adjunct Professor of Law, The Georgetown University Law Center

PANELISTS:

- Nicole Field, Principal, Ernst & Young LLP
- Kevin Jacobs, Managing Director, Alvarez & Marsal Tax, LLC
- Colleen Laduzinski, Partner, Jones Day
- Brian Loss, Branch Chief, Branch 4, Office of Associate Chief Counsel (Corporate), Internal Revenue Service

Partnership Taxation: Technical Hot Topics

MODERATOR: Eric Sloan, Partner, Gibson, Dunn & Crutcher LLP

PANELISTS:

- Jason Dexter, Special Counsel, Office of the Associate Chief Counsel (Passthroughs and Special Industries), Internal Revenue Service
- Sarah Haradon, Attorney-Advisor, Office of Tax Policy, U.S. Department of the Treasury
- Steve Rosenthal, Senior Fellow, Urban-Brookings Tax Policy Center
- Monisha Santamaria, Principal, KPMG US LLP

Tax Credits: Hot Topics Under the Inflation Reduction Act

MODERATOR: Amish Shah, Partner, Holland & Knight LLP

PANELISTS:

- Mary Alexander, Counsel, Vinson & Elkins LLP
- Shariff Barakat, Partner, Akin Gump Strauss Hauer & Feld LLP
- James Holmes, Attorney, Office of the Associate Chief Counsel (Passthroughs and Special Industries), Internal Revenue Service
- Jaime Park, Managing Director, Deloitte Tax LLP

10:25 a.m. to 10:45 a.m. Break
10:45 a.m. to 11:55 a.m. Breakout Session 2

International Taxation: Information Reporting & Penalties

MODERATOR: Melissa Wiley, Partner, Lowenstein Sandler LLP

PANELISTS:

- Maricarmen Cuello, Area Director, International, Independent Office of Appeals, Internal Revenue Service
- Daniel Price, Managing Member, Law Offices of Daniel N. Price, PLLC
- Larry Sannicandro, Partner, Pillsbury Winthrop Shaw Pittman LLP

Corporate Taxation: Hot Topics, Including CAMT

MODERATOR: Eileen Marshall, Partner, Cooley LLP

PANELISTS:

- Colin Campbell, Attorney-Advisor, Office of Tax Policy, U.S. Department of the Treasury
- Andrew Davis, Partner, Cravath, Swaine & Moore LLP
- Justin du Mouchel, Attorney Advisor, Branch 2, Office of the Associate Chief Counsel (Corporate), Internal Revenue Service
- Michael Schler, Retired, Cravath, Swaine & Moore LLP
- Jay Singer, Partner, Hogan Lovells US LLP

Private Foundation: Excise Taxes

MODERATOR: Meghan Biss, Partner, Loeb & Loeb LLP

PANELISTS:

- Ann Batlle, Partner, Morgan, Lewis & Bockius LLP
- Brian Galle, Professor of Law, The Georgetown University Law Center
- Shira Helstrom, Partner, ArentFox Schiff LLP
- Randall Thomas, Senior Counsel, Office of the Associate Chief Counsel (Exempt Organizations), Internal Revenue Service

Artificial Intelligence: Hot Topics

MODERATOR: Travis Thompson, Counsel, Boutin Jones Inc.

PANELISTS:

- Susan Massey, Vice President, Tax Research, Blue J
- Caitlin Tharp, Associate, Steptoe & Johnson LLP
- Potential Government Panelist TBA

11:55 a.m. to 12:40 p.m.

Lunch buffet

12:40 p.m. to 1:40 p.m.

Plenary Session 1

Legislative Update and Tax Reform

MODERATOR: Tom West, Partner, Capitol Tax Partners

PANELISTS:

- Thomas Barthold, Chief of Staff, Joint Committee on Taxation
- Sean Clerget, Chief Tax Counsel, Republican Staff, House Committee on Ways and Means
- Andrew Grossman, Chief Tax Counsel, Democratic Staff, House Committee on Ways and Means
- Randy Herndon, Senior Tax Counsel, Republican Staff, Senate Finance Committee
- Sarah Schaefer, Chief Tax Advisor, Democratic Staff, Senate Finance Committee

1:40 p.m. to 2:10 p.m.

Plenary Session 2

Keynote with Scott Levine, Deputy Assistant Secretary (International Tax Affairs), United States Department of the Treasury

2:10 p.m. to 2:30 p.m.
2:30 p.m. to 3:40 p.m.

Break
Breakout Session 3

Corporate/International Taxation: Cross-Border M&A Update

MODERATOR: Devon Bodoh, Partner, Weil, Gotshal & Manges LLP

PANELISTS:

- Layla Asali, Member, Miller & Chevalier Chartered
- Michael Caballero, Partner, Covington & Burling LLP
- Teisha Ruggiero, Branch Chief, Branch 4, Office of the Associate Chief Counsel (International), Internal Revenue Service
- Tim Shuman, Partner, McDermott Will & Emery
- Brenda Zent, Special Advisor to the International Tax Counsel, Office of Tax Policy, U.S. Department of the Treasury

Partnership Taxation/Tax Controversy: BBA Audits

MODERATOR: Rochelle Hodes, Principal, Crowe LLP

PANELISTS:

- Miri Forster, Partner and Tax Controversy Leader, Eisner Advisory Group LLC
- Macdonald Norman, Associate, Kostelanetz LLP
- Clifford Scherwinski, Director, Pass-Through Entities Practice Area, Large Business and International, Internal Revenue Service
- Mary Slonina, Managing Director, KPMG US LLP

Compensation/Benefits: Hot Topics

MODERATOR: Dominic DeMatties, Partner, Thompson Hine LLP

PANELISTS:

- Christa Bierma, Principal, Ernst & Young LLP and Adjunct Professor of Law, The Georgetown University Law Center
- Viv Hunter Turner, Principal, Groom Law Group, Chartered
- Kevin Knopf, Senior Technician Reviewer, Health and Welfare Branch, Office of the Associate Chief Counsel, (EEE), Internal Revenue Service
- Veena Murthy, Managing Director, PricewaterhouseCoopers LLP
- Laura Warshawsky, Deputy Associate Chief Counsel, Office of the Associate Chief Counsel (Employee Benefits, Exempt Organizations and Employment Taxes), Internal Revenue Service

Tax Credits: Employee Retention

MODERATOR: Ligeia Donis, Partner, Baker McKenzie LLP

PANELISTS:

- Tom Cullinan, Shareholder, Chamberlain, Hrdlicka, White, Williams & Aughtry
- Eric Hylton, National Director, alliantgroup
- Dan Mayo, Partner and Lead, National Tax Services, Withum
- Amber Salotto, Compensation & Benefits Tax Managing Director, RSM Washington National Tax

3:40 p.m. to 4:00 p.m.

Break

4:00 p.m. to 4:30 p.m.

Plenary Session 3

A Conversation with Commissioner Danny Werfel, Internal Revenue Service

Interviewed by Eric Solomon, Partner, Ivins, Phillips & Barker, Chartered and Adjunct Professor of Law, The Georgetown University Law Center

4:30 p.m. to 5:00 p.m.

Plenary Session 4

A Conversation with Erin Collins, National Taxpayer Advocate

Interviewed by Caroline Ciraolo, Partner, Kostelanetz LLP and Adjunct Professor of Law, The Georgetown University Law Center

5:00 p.m. to 7:00 p.m.

Networking Reception

DAY 2

8:30 a.m. to 9:00 a.m.
9:00 a.m. to 10:10 a.m.

Registrant Check-in and Breakfast
Breakout Session 4

International Taxation: Pillar One Update

MODERATOR: Barbara Angus, Consultant, Ernst & Young LLP

PANELISTS:

- Christopher Bello, Attorney-Advisor, Office of Tax Policy, U.S. Department of the Treasury
- Lilian Faulhaber, Vice Dean, Ralph H. Dwan Chair in Taxation, Georgetown University Law Center
- Rocco Femia, Member, Miller & Chevalier Chartered
- Zeb Kelley, Branch Chief, Office of the Chief Counsel (International), Internal Revenue Service

Corporate Taxation: Consolidated Update

MODERATOR: Andrew Dubroff, Co-Director, National Tax M&A Group, Ernst & Young LLP

PANELISTS:

- Jeremy Aron-Dine, Senior Counsel, Branch 1, Office of the Associate Chief Counsel (Corporate), Internal Revenue Service
- Marie Milnes-Vasquez, Managing Director, Ernst & Young LLP
- Olivia Orobona, Principal, PricewaterhouseCoopers LLP
- Jeff Vogel, Principal, KPMG US LLP and Adjunct Professor of Law, The Georgetown University Law Center

Partnership Taxation: Controversy Hot Topics

MODERATOR: Chris Rizek, Partner, Holland & Knight LLP

PANELISTS:

- James Kelly, Deputy Associate Chief Counsel (International, Controversy & Litigation), Office of Chief Counsel, Internal Revenue Service
- Stuart Leblang, Partner, Akin Gump Strauss Hauer & Feld LLP
- Kelley Miller, Partner, Reed Smith LLP and Adjunct Professor of Law, The Georgetown University Law Center
- Joe Sullivan, Associate, Covington & Burling LLP

Financial Institutions & Products: Hot Topics

MODERATOR: Mark Price, Principal, KPMG US LLP

PANELISTS:

- Jonathan LaPlante, Attorney-Advisor, Office of Tax Policy, U.S. Department of the Treasury
- Richard Larkins, Managing Director, U.S. National Tax, Andersen
- Helen Yanchisin, Managing Director, Financial Instruments Group, Deloitte Tax LLP
- Lisa Zarlenga, Partner, Steptoe & Johnson LLP

10:10 a.m. to 10:30 a.m. **Break**
10:30 a.m. to 11:40 a.m. **Breakout Session 5**

International Taxation: Technical Pillar Two

MODERATOR: Jason Yen, Principal, Ernst & Young LLP

PANELISTS:

- Brett Bloom, Attorney-Advisor, U.S. Department of the Treasury
- Mindy Herzfeld, Counsel, Potomac Law Group and Professor of Tax Practice at the University of Florida, Frederic G. Levin College of Law
- Jeff Mitchell, Senior Adviser, Centre for Tax Policy and Administration, The Organisation for Economic Co-operation and Development (Invited)
- Jorge Obén-Cuadros, Senior Counsel, Procopio
- Joshua Odintz, Partner, Holland & Knight LLP and Adjunct Professor of Law, The Georgetown University Law Center

Corporate Taxation: Spinoffs

MODERATOR: Eric Solomon, Partner, Ivins, Phillips & Barker, Chartered and Adjunct Professor of Law, The Georgetown University Law Center

PANELISTS:

- William Alexander, Of Counsel, Tax, Skadden, Arps, Slate, Meagher & Flom LLP
- Derek Cain, Principal, PricewaterhouseCoopers LLP
- Colin Campbell, Attorney-Advisor, Office of Tax Policy, U.S. Department of the Treasury
- Sammy Evei, Director, National Tax, Andersen Tax LLC
- Mark Weiss, Branch Chief, Branch 2, Office of the Chief Counsel (Corporate), Internal Revenue Service

Exempt Organizations: Hot Topics, Including Donor-Advised Funds

MODERATOR: Bridget Weiss, Partner, Arnold & Porter Kaye Scholer LLP

PANELISTS:

- Lynne Camillo, Deputy Associate Chief Counsel, Office of the Chief Counsel (Employee Benefits, Exempt Organizations, and Employment Taxes), Internal Revenue Service
- Carrie Garber Siegrist, Senior Associate, Goodwin Procter LLP and Adjunct Associate Professor of Law, American University Washington College of Law
- Rachel Levy, Associate Chief Counsel, Office of the Chief Counsel (Employee Benefits, Exempt Organizations, and Employment Taxes), Internal Revenue Service
- Elinor Ramey, Partner, Lowenstein Sandler LLP
- Alex Reid, Partner, Baker & Hostetler LLP

Low-Income Taxpayers: Hot Topics

MODERATOR: Jessica Harris, Practitioner-in-Residence and Acting Director, Janet R. Spragens Federal Tax Clinic, American University Washington College of Law

PANELISTS:

- Jessica Hutchinson, Staff Attorney, Low Income Taxpayer Clinic, University of Maryland Francis King Carey School of Law
- Paul Smith, DC Taxpayer Advocate, District of Columbia Office of Tax and Revenue
- Mike Snyder, Acting Deputy Executive Director Case Advocate for Area 2, Taxpayer Advocate Service, Internal Revenue Service
- Sakinah Tillman, Assistant Professor of Law and Director of the Tax Clinic, University of District of Columbia David A. Clarke School of Law

11:40 a.m. to 12:25 p.m.
12:25 p.m. to 12:55 p.m.

Lunch buffet
Plenary Session 5

A Conversation with Francesca Ugolini, Chief, Tax Division, U.S. Department of Justice

Interviewed by Diana Erbsen, Partner, DLA Piper and former Deputy Assistant Attorney General for Appellate and Review, Tax Division, U.S. Department of Justice

12:55 p.m. to 1:55 p.m.

Plenary Session 6

Supreme Court Update Panel

MODERATOR: Andy Weiner, Counsel, Kostelanetz LLP

PANELISTS:

- Keith Fogg, Emeritus Clinical Professor, Harvard Law School
- Dan Geyser, Partner, Haynes and Boone, LLP
- Luke McCloud, Partner, Williams & Connolly LLP
- Rachel Miller-Ziegler, Partner, Munger, Tolles & Olson LLP

1:55 p.m. to 2:15 p.m.
2:15 p.m. to 3:25 p.m.

Break
Breakout Session 6

International Taxation: Hot Topics Part II: Cloud Transaction/Digital Content Regulations

MODERATOR: Paul Oosterhuis, Of Counsel, Skadden, Arps, Slate, Meagher & Flom LLP

PANELISTS:

- Megan Hickman, Special Counsel, Office of Associate Chief Counsel (International), Internal Revenue Service
- Doug Poms, Principal, International Tax, KPMG US LLP
- Natalie Punchak, Attorney-Advisor, Office of Tax Policy, U.S. Department of the Treasury
- Wade Sutton, Principal, PricewaterhouseCoopers LLP and Adjunct Professor of Law, The Georgetown University Law Center

Tax Controversy: Tax Litigation Update

MODERATOR: Caroline Ciralo, Partner, Kostelanetz LLP and Adjunct Professor of Law, The Georgetown University Law Center

PANELISTS:

- Justin Campolieta, Partner, Jones Day
- Lindsay Clayton, Assistant Chief, Tax Division, U.S. Department of Justice (Invited)
- Lisandra Ortiz, Member, Miller & Chevalier Chartered
- Andrew Strelka, Counsel, Latham & Watkins, LLP

Hot Topics in Tax Insurance

MODERATOR: Patrick Browne, Jr., Senior Vice President, Marsh USA LLC and Adjunct Professor of Law, The Georgetown University Law Center

PANELISTS:

- Shirley Chin, Head of Tax Insurance, Private Equity & Transactional Solutions, WTW
- John Rayis, Senior Strategic Advisor, Lockton Companies
- Yoav Shans, Partner, McGill and Partners

Individual Taxation: Filing Season and Direct File

MODERATOR: Christine Speidel, Associate Professor and Director, Federal Tax Clinic, Villanova University

PANELISTS:

- Debora Gorman, Director, Legal Division, Comptroller of Maryland
- Jacqueline Lainez Flanagan, Deputy Director, Center for Taxpayer Rights
- Rebecca Thompson, Senior Advisor, IRS Program Office, U.S. Department of the Treasury
- Beverly Winstead, Professor and Director, Low Income Taxpayer Clinic, University of Maryland Francis King Carey School of Law

3:25 p.m. to 3:45 p.m.

Break

3:45 p.m. to 4:15 p.m.

Plenary Session 7

A Conversation with Seth Hanlon, Deputy Assistant Secretary (Tax and Climate Policy), U.S. Department of the Treasury

4:15 p.m. to 5:15 p.m.

Plenary Session 8

OECD Update

MODERATOR: Itai Grinberg, Professor of Law, The Georgetown University Law Center and Former Deputy Assistant Secretary (International Tax Affairs), Office of Tax Policy, U.S. Department of the Treasury

PANELISTS:

- L.G. “Chip” Harter, Former Deputy Assistant Secretary (International Tax Affairs), Office of Tax Policy, U.S. Department of the Treasury
- Scott Levine, Deputy Assistant Secretary (International Tax Affairs), U.S. Department of the Treasury
- Michael Plowgian, Principal, KPMG US LLP and Former Deputy Assistant Secretary (International Tax Affairs), Office of Tax Policy, U.S. Department of the Treasury

5:15 p.m. to 7:00 p.m.

Networking Reception