

Re:Cap

Caplin & Drysdale
ATTORNEYS

Speakers Corner

April 2005

April 1, 2005

Virginia Tax Study Group

Location: University of Virginia School of Law

Speaker: **Mortimer M. Caplin**

Mr. Caplin will chair and speak at the Washington Group Session.

April 11-12, 2005

The Alliance for Tax, Legal & Accounting Seminars presents Tax Treaties: Recent Developments and Emerging Issues

Location: New York, NY

Speaker: **H. David Rosenbloom**

Mr. Rosenbloom will present "Overview: Interpretation and Application of U.S. Income Tax Treaties," and will moderate a panel discussion on "Recent Treaties and Protocols-A Comparative Analysis."

April 18, 2005

Law and Faith: Legal Issues Facing Religious Organizations

Location: American University Washington College of Law, Washington, D.C.

Co-chair: **Milton Cerny**

Speakers: **Milton Cerny, Lloyd Mayer, Trevor Potter, Richard Skillman**

Mr. Cerny will moderate a panel discussion on "Church Response to the Tsunami Disaster -What Lessons Have Been Learned." Mr. Mayer and Mr. Potter will both speak on "Political Activities by NGOs." Mr. Skillman will speak on "Compensation, 403(b), Church Plans and Other Employment Issues."

April 19, 2005

Minnesota State Bar Association's 2005 Business Law Institute

Location: Minneapolis, MN

Speaker: **Scott D. Michel**

Mr. Michel will present "What Business Lawyers Should Know About the New Environment of Corporate Criminal and Tax Enforcement."

April 27, 2005

Instituto de Pesquisa Tributarias and Ibemc Sao Paulo

Location: Sao Paulo, Brazil

Speaker: **H. David Rosenbloom**

H. David Rosenbloom will be speaking on the "U.S. Approach to Transfer Pricing."

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Speakers Corner

April 28-29, 2005

International Tax Law Congress

Location: Rio de Janeiro, Brazil

Speaker: **H. David Rosenbloom**

H. David Rosenbloom will be speaking on the “U.S. Approach to Transfer Pricing.”

April 29, 2005

ABA Section of Real Property, Probate and Trust Law

Location: Washington, D.C.

Speaker: **Beth Kaufman**

Ms. Kaufman will participate in a panel discussion on “National Roundup of Audit Issues for Federal Estate and Gift Tax Returns.”

April 29, 2005

2005 J. Nelson Young Tax Institute

Location: University of North Carolina School of Law, Chapel Hill, NC

Speaker: **Scott D. Michel**

Topic: Mr. Michel will speak on “Circular 230 and Related Topics.”

May 17, 2005

Annual Membership Conference, American Law Institute

Location: Philadelphia, PA

Speaker: **Thomas A. Troyer**

Mr. Troyer will speak on “Lobbying by Section 501(c)(3) Organizations.”

May 20, 2005

ABA Tax Section’s Spring Meeting

Location: Washington, D.C.

Speaker: **Chris Rizek**

Mr. Rizek is moderating a panel discussion on “The Pitfall and Pratfalls of Electronic Discovery” and speaking on a panel on “TEFRA Provisions in Partnership Agreements.”

Head of the Class

Spring 2005

American University’s Washington College of Law

Milton Cerny is teaching his course on the Law of Nonprofit Organizations.

April 7, 2005

Baruch College/CUNY Public Affairs Week in NY

Trevor Potter will speak on “527s and the Future of Campaign Finance Reform.”

Honors and Appointments

Scott D. Michel, along with his colleague Roger Goldman of Latham & Watkins, has received the 2005 National Association for Law Placement (NALP) Award of Distinction for Innovation in recognition of their creation and development of Buildable Hours. The award will be presented at the NALP Annual Education Conference in Chicago, IL on April 20, 2005.

Notes and Notables

Attorney **Sydney J. Hoffmann** joined the firm's white-collar defense practice group this month as Of Counsel.

Caplin & Drysdale, a sponsor of the Federal Bar Association's 29th Annual Tax Conference held on March 17, 2005 in Washington, D.C., had three attorneys participate as speakers at the conference. **Chris Rizek** spoke on "Developments to Watch For on Privileges" and "Resolving Cases and Getting Current," **Michael Doran** spoke on "Executive Compensation and Employee Benefits Issues," and **H. David Rosenbloom** spoke on "International Tax."

Walter Solcombe participated in the Full Committee Hearing on the Training of Iraqi Security Forces with the House Armed Service Committee on March 17, 2005 at the Rayburn House Office Building in Washington, D.C.

Mortimer M. Caplin, Honorary Chair of the University of Virginia's Council for the Arts, spoke at its March 18, 2005 spring meeting in Charlottesville on the University's major enlargement of its arts facilities—a new performing arts center and museum, expanded music, theater and dance facilities, and a new studio arts building. Mr. Caplin helped organize the Council over 10 years ago, serving as its Chair until his present appointment by UVA President John Casteen.

The Wisconsin Alumni Research Foundation of University of Wisconsin at Madison (WARF), a long standing client of **Milton Cerny** and **Caplin & Drysdale**, has received the National Science Foundation Award for Science and Technology presented by President Bush. WARF is a \$2 billion research institute that supports the University in perfecting and licensing patents created in their laboratories and departments.

Speakers Corner

February 25, 2005

"Laundered Money Did Not Satisfy Tax Bill"

Tax Notes Today

The case **Caplin & Drysdale v. United States**, 491 U.S. 617, 627 (1989), is referenced in this article addressing a Tax Court holding regarding money launderers.

February 28, 2005

"Targeting Tax Reg to Fix Social Security"

Legal Times

Seth Green was quoted saying "The goal of the regs was to provide an up-to-date interpretation for tax purposes of a limited partner." This article also mentioned that Green worked on the proposed Treasury regulations. (This article also appeared in *The Recorder* on February 28 and in the *Fulton County Daily Report* on March 4.)

March 1, 2005

"Witness says DeLay's PAC should have reported expenditures"

The Associate Press State and Local Wire

Trevor Potter is mentioned as testifying that Texans for a Republican Majority, formed by Republican U.S.

House Majority Leader Tom DeLay, should have reported some \$600,000 in expenditures on state disclosure forms. (This article also appeared in UPI, *The Dallas Morning News*, *United Press International* on March 2, *New York Times* on March 3, and *Austin Chronicle* on March 10.)

March 8, 2005

"Justices Say Tax Court May Not Exclude Special Trial Judges; Reports on Appeal"

BNA's Daily Tax Report

Chris Rizek commented on the Supreme Court's decision in a significant Tax Court rules case, *Ballard v. Commissioner*.

March 9, 2005

"Fewer Couples File Separately, but Option Still Deserves a Look"

Wall Street Journal

Chris Rizek is quoted in this article on the availability of innocent spouse relief for certain filers of joint returns.

Speakers Corner

March 11, 2005

“Unofficial Transcript of IRS Hearing on Tax-Sheltered Annuity Contracts”

Tax Notes Today

Mentioned **Richard Skillman** as a speaker at the IRS hearing on February 15, 2005 on proposed regulations (REG-155608-02) on section 403(b) arrangements at which speakers were warned that the regs could make it more difficult for employers to offer retirement plans.

March 14, 2005

“Compliance, Reforms Dominate Talk at EO Conference”

Tax Notes

Mentioned that attendees of the conference heard **Marcus S. Owens** analyze the IRS’ compliance efforts in the exempt organizations area. (*This article also appeared in Tax Analysts on March 25.*)

March 14, 2005

“Unwelcome houseguests; As the IRS expands CEP audits to include smaller healthcare facilities, Carle Foundation Hospital finds itself playing host”

Modern Healthcare

Marcus Owens commented on a comprehensive audit of a 421-bed Illinois not-for-profit hospital, noting that large tax settlements have resulted in the related IRS audit program.

March 16, 2005

“New Circular Helpful, But No Substitute For Increased Cooperation, Practitioners Say”

Tax Management Inc.

Patricia Lewis commented on the recent circular that was released by the Canada Revenue Agency on competent authority procedures when negotiating U.S.-Canada cases.

March 16, 2005

“Attorneys Seek Public Airing of Issues on Down Payment Program Guidance”

Tax Notes Today

Milton Cerny and **Marcus Owens** reiterated their request in this article that any guidance on Treasury’s homeowner down payment assistance program be issued in proposed form to allow public comment.

March 18, 2005

“Free Speech Needs Jerry Maguire”

www.TechCentralStation.com

In this article which discussed campaign-finance reform, **Trevor Potter** is mentioned as being general counsel to McCain 2000.

Pro Bono

Bob Boisture and the entire **Exempt Organizations** practice group played a significant role in preparing the recent interim report of The Panel of The Nonprofit Sector that was presented to the U.S. Senate Finance Committee on March 1, 2005. To read the entire report, please go to <http://www.nonprofitpanel.org/interim/>.

Milton Cerny is Chairman of the Long Range Planning Committee of the Mt. Olivet United Methodist Church in Arlington, VA which just celebrated its 150 year anniversary. He also serves on the CEELI Advisory Board of the American Bar Association that is planning the Rule of Law Conference in Washington D.C. to be held in November 2005 Co-hosted by Supreme Court Justice Stephen G. Breyer and Justice Sandra Day O'Connor. President George W. Bush has been invited to make the main address. Mr. Cerny is also coordinating a habitat for humanity type program for the reconstruction of a Historic Church in Karlovy Vary, Czech Republic.

For more information on any of the items contained in this issue of Re:Cap please contact the Marketing Department at 202-862-5000 or krs@capdale.com