

# 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 Ciruolo, 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:

- Kevin Brogan, Principal, KPMG US LLP
- Paul Crispino, Attorney-Advisor, Office of Tax Policy, U.S. Department of the Treasury
- Mark Graham, Principal, Deloitte Tax LLP
- Rebecca Lee, Principal, PricewaterhouseCoopers LLP
- Shane McCarrick, Special Counsel, Office of Associate Chief Counsel (International), Internal Revenue Service

### **Corporate Taxation: Taxation of Troubled Companies**

MODERATOR: Joseph Pari, Co-Chair, Tax Department, Weil, Gotshal & Manges LLP

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 Battle, 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: Caitlin Tharp, Associate, Steptoe & Johnson LLP

PANELISTS:

- Susan Massey, Vice President, Tax Research, Blue J
- 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 Ciruolo, 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
- 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 Schneider, Associate Chief Counsel (Corporate), Office of Chief Counsel, Internal Revenue Service
- 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:

- Disner C. Alexander, Local Taxpayer Advocate (DCLTA), Taxpayer Advocate Service, Internal Revenue Service
- 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

**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, Stakeholder Engagement with the Inflation Reduction Act (IRA) 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**