

# **Dodging the Tax Bullet**

**How to Protect Your Company Against Catastrophic Tax Losses**

**MCLE Ten Winter Place, Boston, MA 02108**

**October 21, 2010**

**Networking and Registration: 8:00 am – 9:00 am**

**Program 1 - Employee Misclassification Traps: 9:00 am – 11:00 am**

**Speakers:** Samantha Halem, Esq., The Marshall Law Group

Valerie Samuels, Esq., Posternak Blankstein & Lund, LLP

Barry A. Guryan, Esq., Epstein Becker & Green, P.C.

Morris N. Robinson, Esq., CPA, LL.M., M. Robinson & Co., P.C.

- Avoiding Triple Damages and Attorneys Fees for Inadvertent Violations of the Employment Laws – A Brief Summary of Potential Traps
- Avoiding Health Care Penalties
- Avoiding Unnecessary Unemployment Taxes
- Avoiding Catastrophic United States and Massachusetts Payroll-Tax Audit Adjustments
- Famous Case Examples

**Morning Break: 11:00 am – 11:10 am**

**Program 2 - How to Control Tax Audits and Defense Fees: 11:10 am - 12:00 pm**

**Speakers:** Morris N. Robinson, Esq., CPA, LL.M., M. Robinson & Co., P.C

Richard E. Nicolazzo, Nicolazzo & Associates

**How to Mount a Successful Tax-Audit Defense**

- Estimating the Potential Tax Exposure: The Spectrum of Alternative Audit Outcomes

- Understanding Opportunity Costs
- Understanding Precedent Costs
- Deciding When to Settle
- Deciding on a Settlement Amount

How to Control Tax-Audit Defense Fees

- Defining a “Successful Defense”
- Relating Audit Defense Fees to the Benefits of a Successful Defense: The “Three-To-One Rule”

How to Handle Negative Publicity

- Understanding the Effect of Negative Publicity on Customers, Suppliers, and Bankers
- Crafting a Response
- Transmitting your Response to the Media and Others

**Program 3 – “Hot” Audit Issues: 12:00 pm -1:00 pm**

Speaker: William P. Marshall, IRS North Atlantic Area Director for SB-SE-Examination.

- Collection of “Hot” Audit Issues and How to Avoid Them.

→ Q&A Session

**Lunch Break: 1:00 pm – 1:45 pm**

**Program 4: IRS Position on Uncertain Tax Positions 1:45 pm – 2:45 pm**

Speakers: Morris N. Robinson, Esq., CPA, LL.M., M. Robinson & Co., P.C.

Timothy R. Weeks, Esq., LL.M., M. Robinson & Co., P.C.

Matthew A. Morris, Esq., LL.M., M. Robinson & Co., P.C.

**Afternoon Break: 2:45 pm – 3:00 pm**

**Program 5: Multi-State Tax Traps 3:00 pm – 5:00 pm**

Speaker: Donna Killmon, Esq., LL.M.

Morris N. Robinson, Esq., CPA, LL.M., M Robinson & Co., P.C.

- Nexus Traps
- Income Tax: P.L. 86-272
- Sales/Use/Meals Tax Traps
- Income Shifting: Transfer Prices, Interest & Royalties, etc.

→ Q&A Session, End of Program