

SCHWERIN TO PRESENT AT 2018 INTERNATIONAL TAX ENFORCEMENT UPDATE

Posted on June 15, 2018 by Michelle F. Schwerin



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On June 20th, Michelle F. Schwerin will present at the [Agostino & Associates](#) Annual International Tax Enforcement Update. This annual event brings tax professionals together in New Jersey to share their experiences and discuss current events and best practices relating to International Tax Enforcement and Voluntary Disclosures.

Representing Taxpayers Before IRS Appeals with respect to Penalties Resulting from the Failure to Report Foreign Income or Assets

Michelle and three other attorneys will present a session entitled: "Representing Taxpayers Before IRS Appeals with respect to Penalties Resulting from the Failure to Report Foreign Income or Assets". Topics will focus on: (1) The Pre-Assessment Appeal & the Impact on CDP; (2) The Issues for the Post Assessment Appeal; (3) Appeals from Claims for Refund &/or Abatement; and (4) Penalty Mitigation.

The choice of a lawyer is an important decision and should not be based solely upon advertisements.

















International Tax Enforcement Update

Four (4) Free NY & NJ CLE, CPE*, and EA CCE Credits

(Tax Practs that attend the seminar are encouraged to accept a tax firm's customary assignment from an ABA approved Tax Court Pro-Bono program or a NY/NJ CLE)

ONLINE	Wednesday, June 20, 2018, 8:00 AM - 12:00 PM
WHERE	Northwestern Performing Arts Center, 102 State Street, New Haven, CT 06510

The firm's update reviews the life cycle of an international tax controversy including up to the most common areas on returns regarding as to the flow to US Persons reporting foreign assets and income. Also the procedures used by the IRS to determine a liability based on foreign income, deductions, and assets. US tax actions available to combat and compromise the international adjustments and penalties before the IRS Office of Appeals, including accelerated appeals, collection due process hearings, and the best practices for litigating international issues in the Tax Court and other federal courts. Our panel includes:

Sandra R. Brown, Esq.
Hochman, Sabin, Heller, Teacher & Pensi

Elizabeth Chung, Esq.
Morris USA LLP

Philip Connors, Esq.
Agostino & Associates

Jeffrey Elman, Esq.
Agostino & Associates

Stacey Olmstead, MA/MSW

Mary Beth Lujan, Esq.
USSTP, American Expat Tax Services

S. Staring Marshall, Esq.
Covington

Lawrence Sambarino, Esq.
McCartier & English

Michael Sander, Esq.
Kisilevsky & Fink, LLP

Michael J. Scanduto, Esq.
Jones Day

Michelle P. Schwenn, Esq.
Capitol & Drysdale

John Shewley, Esq.
Tax Practice Pro, LLC

Diana A. Shuster, JD, LL.M.
Friedman LLP

Steve Teacher, Esq.
Hochman, Sabin, Heller, Teacher & Pensi

Michael Wolfson, Esq.
Agostino & Associates

Adrian Lufsky Wills, Esq.
Cody, LLP

Zheena A. Zering, Esq.
Capitol & Drysdale

RSVP for the International Tax Enforcement Update
<http://bit.ly/INTX-2018-06-20>



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Please sign up for lunch after the seminar at the **Agostino & Associates** Reception. <http://bit.ly/INTX-2018-06-20>

*Continuing education approved by the Board on Continuing Legal Education of the American College of Trust and Estate Counsel (CETEC). CPEs will only apply to those in attendance, attendance in person or by audio. In-person attendees will receive credit for 1.0 CPE. Audio attendees will receive credit for 0.5 CPE. The firm's update reviews the life cycle of an international tax controversy including up to the most common areas on returns regarding as to the flow to US Persons reporting foreign assets and income. Also the procedures used by the IRS to determine a liability based on foreign income, deductions, and assets. US tax actions available to combat and compromise the international adjustments and penalties before the IRS Office of Appeals, including accelerated appeals, collection due process hearings, and the best practices for litigating international issues in the Tax Court and other federal courts. Our panel includes:

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