

## SPEAKER'S CORNER

### UPCOMING EVENTS

#### SEPTEMBER

**September 19-20, 2002**

**Mealey's National Asbestos Litigation Conference**

Location: The Westin Hotel, Philadelphia, PA

Speaker: **Peter Van N. Lockwood**

Mr. Lockwood will give an asbestos bankruptcy update.

**September 19-20, 2002**

**Asbestos Litigation in the 21<sup>st</sup> Century**

Location: LeMeridien, Chicago, IL

Speaker: **Elihu Inselbuch**

Mr. Inselbuch will give a presentation on "Bankruptcy: The View from the Trenches."

**September 23-25, 2002**

**2002 Fall Conference for Community Foundations**

Location: Atlanta, GA

Speaker: **Douglas Varley**

Mr. Varley will speak at this conference.

**September 26, 2002**

**Federal American Inn of Courts**

Location: Washington, DC

Speaker: **David Webster**

Mr. Webster will speak at this meeting.

#### OCTOBER

**October 16, 2002**

**Issues Affecting Religious Organizations in MD, VA, and DC**

Location: Rockville, MD

Speakers: **Marcus Owens** and **Lloyd Mayer**

Messrs. Owens and Mayer will be speaking to clergy and board members from churches and synagogues, organizations run by religious orders and attorneys and accountants who advise these organizations.

**October 24-26, 2002**

**Tax Treaties and the Taxation of Business Profits Seminar**

Location: Harvard Law School, Cambridge, MA

Speaker: **H. David Rosenbloom**

Mr. Rosenbloom will speak at this seminar on the various aspects of the taxation of business profits under bilateral tax treaties.

**October 31, 2002**

**Health Care Law and Litigation**

Location: Washington, DC

Speaker: **Scott Michel**

Mr. Michel will speak on voluntary disclosures and eggshell audits.

*For more information, please contact the Marketing Department at (202) 862-5000 or e-mail [bcd@capdale.com](mailto:bcd@capdale.com).*

## IN THE NEWS

September 3, 2002

### “Judge Strikes Down Some Requirements for Disclosure by Section 527 Organizations”

*Daily Tax Report*

In the article, **Trevor Potter** explains that although parts of the law were struck down as unconstitutional, critical components of the law were upheld. Specifically, Mr. Potter was pleased that the Alabama judge agreed that the disclosure requirement could constitutionally be applied to 527 organizations whether they are engaged in express advocacy of certain candidates or only in “issue advocacy” in federal campaigns.

September 3, 2002

### “Profile of Offshore Bank Customers Emerges in Latest U.S. IRS Filings”

*Worldwide Tax Daily*

**Christopher Rizek** comments on the significance of the IRS decision to issue summonses to 40 vendors who have sold products and services to customers using offshore credit cards. Mr. Rizek believes that this action signals a serious commitment by the IRS to crack down on people who use offshore bank accounts to evade paying taxes. *(This article also appeared in the September 2<sup>nd</sup> issue of Tax Notes and the August 30<sup>th</sup> issue of Tax Notes Today.)*

September, 2002

### “Group Said to be Funding Terrorists Listed as Public Charity by IRS”

*The Exempt Organization Tax Review*

In this article, **Marcus Owens** discusses one approach the IRS could take to revoke the organization’s tax exempt status while bypassing the normal appeals process. *(This article also appeared in the August 19<sup>th</sup> issue of Tax Notes and the August 15<sup>th</sup> issue of Tax Notes Today.)*

August 19, 2002

### “U.S. Regs on Compensatory Stock Options Get Mixed Reviews”

*Tax Notes International Magazine*

In this article, **Patricia Lewis** gives her opinion about recently proposed IRS regulations that would require companies to include stock-based compensations when determining operating expenses for the purposes of qualified cost-sharing arrangements. *(This article also appeared in the August 16<sup>th</sup> issue of Tax Practice and Controversies, the August 8<sup>th</sup> issue of Worldwide Tax Daily, the August 7<sup>th</sup> issue of Tax Notes Today, and the August 5<sup>th</sup> issue of Tax Notes.)*

August 2002

### “Asbestos Settlement”

*Corporate Counsel*

**Julie Davis**, **Elihu Inselbuch**, and **Peter Lockwood** are mentioned for their work on behalf of the Committee of Unsecured Asbestos Creditors in the Pittsburgh Corning litigation which settled for \$2.7 billion dollars in favor of the asbestos claimants.

August 2002

### “The Service’s Tough Shelter Talk Turns to Action”

*The Insurance Tax Review*

**Richard Skillman** and **Christopher Rizek** are quoted in this article about recent tax shelter developments. *(This article also appeared in the July 19<sup>th</sup> issue of Tax Practice & Controversies, the July 9<sup>th</sup> issue of Tax Notes Today and the July 8<sup>th</sup> issue of Tax Notes.)*

August 2002

### “Federal Tax Credits Needed to Fuel Political Engine”

*The Exempt Organization Tax Review*

The article discusses a recent conference of the American Enterprise Institute for Public Policy Research where **Trevor Potter** and other guest speakers expressed support for a federal tax credit for political contributions. *(This article also appeared in the July 1<sup>st</sup> issue of Tax Notes and the June 25<sup>th</sup> issue of Tax Notes Today.)*

August 5, 2002

### “Many Energy Companies Create Offshore Havens to Cut Tax Bills”

*Wall Street Journal*

In this article, **H. David Rosenbloom** explains that setting up foreign entities to avoid U.S. taxes has been around for a long time and under the current system is a perfectly legal strategy for tax minimization.

August 5, 2002

*CNN Financial News Network*

**H. David Rosenbloom** was interviewed on live television by Kathleen Hays and Bruce Francis regarding offshore tax havens on August 5<sup>th</sup>.

## RECENT PUBLICATIONS

September 2002

**“Tax Accounting Monthly Column”**

**Corporate Business Taxation Monthly**

By: **James Salles**

This column addresses proposed amendments to the section 457 regulations that would currently tax compensatory options at grant, new "safe harbor" rules for utility financing orders, and the IRS' 2002-03 business plan.

August 5, 2002

**“A Blueprint for Creating a Taxable Subsidiary”**

**The Exempt Organization Tax Review**

By: **Lloyd H. Mayer**

The article summarizes a recent IRS private letter ruling which Mr. Mayer believes is an excellent blueprint for creating and structuring an exempt organization's relationship with its taxable subsidiaries.

August 2-8, 2002

**“Treasury Department Closing the Door on Tax Shelters”**

**Washington Business Journal**

By: **Christopher Rizek**

The article discusses the government's recent legislative, regulatory, and administrative actions aimed at curbing the use of tax shelters.

August 2002

**“The Viability of Multidisciplinary Practice”**

**The Insurance Tax Review**

By: **Mortimer M. Caplin**

The article about MDP partnerships between accountants and lawyers is based on Mr. Caplin's remarks made during the Medal in Law Ceremony at UVA School of Law on April 12, 2001.

*(This article also appeared in the July 2, 2002 issue of Tax Notes Today, the July 1, 2002 issue of Tax Notes and the May 2002 issue of The Washington Lawyer.)*

August 2002

**“Tax Accounting Monthly Column”**

**Corporate Business Taxation Monthly**

By: **James Salles**

This column discusses statutory changes affecting the "nonaccrual experience method" under section 448 and various capitalization developments.

## HEAD OF THE CLASS

August 2002 –

We are pleased to announce that **H. David Rosenbloom** has been appointed Director of the International Tax Program at New York University Law School. In this capacity, he will oversee the program's academic direction, the choice of courses and faculty, and the marketing of the program. This unique LL.M program is offered exclusively to foreign lawyers in private practice.

August – December, 2002

Location: University of Pennsylvania Law School, Philadelphia, PA

Adjunct Faculty: **Matthew Frank**

Mr. Frank will teach a semester-long course on International Tax at the law school.

September – December, 2002

Location: Georgetown University Law Center, Washington, DC

Adjunct Faculty: **Jessica Katz**

Ms. Katz will teach a semester-long course on U.S. Taxation of International Income at the law school.