



**Jay Weill, Emily Kingston and Steven Katz
of Sideman & Bancroft LLP**

LITIGATING AGAINST THE IRS – VIEWS FROM THE FRONT LINES

With specific focus on how these issues may arise in the estate and probate arena, the speakers will give an overview of the process of litigating IRS matters from audit to administrative appeal to trial in the Tax Court and district courts or Claims Court, including discussion of specific cases such as valuation matters and penalty issues. In addition, the presentation will include an extensive discussion of current IRS enforcement activity involving offshore bank accounts and other offshore assets and litigation of these matters.

Jay Weill was a government prosecutor for 35 years, most notably as Chief of the Tax Division of the U.S. Attorney's Office in San Francisco, the office to which he was appointed by the U.S. Attorney in 1982. Mr. Weill remained as Chief for 25 years, until 2007, litigating and/or supervising numerous cases (he has over 135 reported cases). <http://www.sideman.com/lawyers/detail/biography/32/Jay-Weill>

Emily Kingston worked as a Trial Attorney in the Honors Program for the Tax Division of the United States Department of Justice for sixteen years, as an Attorney and Special Assistant United States Attorney for the Office of Chief Counsel of the Internal Revenue Service in San Jose, and as an Assistant U.S. Attorney for the United States Attorney's Office for the Northern District of California in San Francisco, first in the Civil Division and subsequently in the Tax Division. <http://www.sideman.com/lawyers/detail/biography/16/Emily-J-Kingston>

Steven Katz concentrates his practice on the full spectrum of taxpayer controversies, representing individuals, corporations, partnerships, and trusts and estates. He counsels his clients in all phases of disputes against the Internal Revenue Service (IRS), the California State Board of Equalization, the California Franchise Tax Board, and the California Employment Development Department, including audits, administrative appeals, and both routine and complex collection matters. <http://www.sideman.com/lawyers/detail/biography/14/Steven-M-Katz>

Join us on **Wednesday, May 15, 2013** at 5:30 PM at the Omni Hotel
500 California (at Montgomery) in San Francisco.

*Please note that due to an unanticipated emergency, the previously-scheduled speaker and topic (Michael LeBeau, Property Tax Aspects of Estate and Gift Planning) has been re-scheduled to next year, tentatively March 19, 2014

\$70 Preregistered Members \$75 Preregistered Guests

At the door – Registrations still needed- \$75 members and \$80 guests

If you or your guest requires a vegetarian meal please send an email to: sfepc@astound.net

Send a check with names to: SFEPCC – 767 Brannan Place – Concord, CA 94518
Or pay by credit card – <http://www.123signup.com/calendar?org=sfepc>

Continuing Education Credit:

MCLE: This activity is approved for MCLE credit of one hour by the State Bar of California.
CPA & CFP®: A sign-in sheet and an attendance certificate are provided at each meeting.

Excused Absence:

Members can request an excused absence by mailing a letter, or sending an email (SFEPCC@astound.net) to the Council Office prior to the meeting. Please address the letter to the Board of Directors.