

# NEILL & BOXERMAN TO PRESENT AT THE ABA'S 2017 ANNUAL NATIONAL INSTITUTE ON CRIMINAL TAX FRAUD

*Posted on November 28, 2017 by Sanford J. Boxerman*



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**Tags:** [Sandy Boxerman](#), [Sara Neill](#)



On December 7<sup>th</sup>, Sara G. Neill and Sanford J. Boxerman will present at the American Bar Association's 34th Annual National Institute on Criminal Tax Fraud and Seventh Annual National Institute on Tax Controversy.

The 34th Annual National Institute on Criminal Tax Fraud is the annual gathering of the criminal tax defense bar combined with the Seventh Annual National Institute on Tax Controversy. This annual event, presented by the American Bar Association Taxation and Criminal Justice Sections, brings together national practitioners engaged in all aspects of tax controversy, tax litigation, and criminal tax prosecutions and defense. Attendees and presenters include high-level government representatives, judges, corporate counsel, and private practitioners.

## **Internal Investigations: How to Navigate Ethical Issues To Learn What You Need To Know**

**Moderator:** Bryan C. Skarlatos

**Speakers:** Armando Gomez, Sanford J. Boxerman, Nanette Davis

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

*When a company, its owners, officers, and employees may all be implicated, there are multiple tactical, ethical and substantive challenges for defense counsel. This panel will address common issues that arise in conducting an internal investigation, including the ethical questions of conflicts of interest, privilege, and confidentiality; broader issues such as cooperation and penalties; and key strategies for conducting internal investigations and resolving corporate criminal investigations.*

## **Civil Fraud and Accuracy Penalties: Strategies for the Administrative Appeal and Litigation**

**Moderator:** Sara G. Neill

**Speakers:** Niles A. Elber, Diana L. Erbsen, Philip Wilson

*Hear a roundtable discussion regarding issues of good faith, reasonable cause and reliance or ignorance as possible defenses to accuracy penalties. Special focus on defending against the civil fraud penalty, including the legal standards, tips for avoiding it, and strategies for handling it at appeals and in Tax Court litigation. The IRS has become more diligent about asserting taxpayer penalties, and recent cases have addressed taxpayers' ability to avoid penalties by relying on the advice of a professional. Practical advice and recommendations to protect your client . . . and you!*

For more information, please visit: [34th Annual National Institute on Criminal Tax Fraud and Seventh Annual National Institute on Tax Controversy Program](#)

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