

UCLA 38th Annual Tax Controversy Institute Conference: Message from Steven Toscher and Sandra Brown, Institute Co-Chairs

By Steven Toscher and Sandra Brown



For 38 years, the UCLA Annual Tax Controversy Institute has been among the preeminent tax conferences in the United States exclusively dedicated to tax controversy and tax litigation. This year, I, along with my partner, Sandra Brown, are again honored and privileged to serve as Co-Chairs of the UCLA 38th Annual Tax Controversy Institute.

The Institute enjoys national recognition in the field of tax controversy, representing a true partnership among members of the tax judiciary, government, and private tax practitioners. We have long embraced the collaboration between government and private tax practitioners that encourages an atmosphere of enhanced relationships by providing an informal forum for the discussion and exchange of concerns and information among these partners. Our responsibilities to tax administration and the profession dictate an ongoing, strong commitment to this annual Institute. This year, we again had a wealth of suggestions for potential topics and speakers—remember the Institute during the coming year and please let us know if you are interested in participating, and save the date for next year, October 26, 2023, at the Beverly Hills Hotel.

We were privileged to, again this year, have as our keynote luncheon speaker **Charles P. Rettig**, the 49th Commissioner of Internal Revenue. We were also excited to have additional keynotes provided throughout the day by the Internal Revenue Service (IRS) Taxpayer Advocate **Erin Collins**, IRS Chief of Criminal Investigation **James Lee**, and IRS Deputy Commissioner of SB/SE Collection & Operation Support **Darren John Guillot**.

The Institute honored this year's recipient of the 2022 Annual Bruce I. Hochman Award **Paula M. Junghans** of Zuckerman Spaeder LLP in Washington, DC. The Annual Award is presented in recognition of a lifetime of outstanding achievements and contributions to the professional tax practitioner community. Bruce's son, Nathan Hochman, a practicing tax professional and former Assistant Attorney

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General for the Tax Division of the U.S. Department of Justice, presented the award.

Ms. Junghans received this recognition for her leadership in “federal tax litigation as a defense lawyer, a former prosecutor and Acting Assistant Attorney General of the Tax Division of the U.S. Department of Justice, as well as a friend, mentor, colleague, and role model especially to younger women entering the tax practitioner community.”

Paula’s friends and peers recalled her as a consummate professional, skilled at “working a room,” and always with the highest of standards, values, honor, integrity, and civility. Paula was also recognized for her keen instincts for “the care and feeding of clients.”

One life-long colleague commented, “She is a lawyer’s lawyer, respected by those who know her and retained by clients who wanted and got sound judgment, great strategic thinking, and vigorous representation.”

In closing, we wish to extend our sincere appreciation and thanks to all of our speakers, sponsors, advisory board, and planning committee, as well as key UCLA personnel (**Thamires, Josh, and Mark**), for their valued contributions in making the UCLA Annual Tax Controversy Institute a huge success year after year.



Nathan Hochman presenting the 2022 Annual Bruce I. Hochman Award to Paula Junghans. Photos by EF Marton Productions.



Charles Rettig, ending his term as Commissioner of Internal Revenue with his last official presentation. Photos by EF Marton Productions.



Sandra Brown, Conference Co-Chair. Photos by EF Marton Productions.



Morning Keynote Speaker, Erin Collins, IRS Taxpayer Advocate. Photos by EF Marton Productions.



Late Morning Keynote Speaker, Jim Lee, Chief, Criminal Investigation Division, IRS. Photos by EF Marton Productions.



Attendees enjoying the relaxed, collegial atmosphere in style at the Beverly Hills Hotel. Photos by EF Marton Productions.



Collection and Offer Specialist Panel: Darren Guillot, IRS Deputy Commissioner, SBSE Collection & Operations Support; Practitioners (L to R): Ronson Shamoun, Michelle Schwerin, Steve Jager, and Igor Drabkin. Photos by EF Marton Productions.



Conference Co-Chair Steve Toscher and Darren Guillot, IRS. Photos by EF Marton Productions.

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