



News, Events & Publications

Daniel A. Rosen

Publications

- Author, "The IRS's Pincer Movement on Appeals Independence," Bloomberg BNA Daily Tax Report, 26 June 2017
- Author, "Chief Counsel's Comments on Challenges to IRS Rulemaking," Tax Notes, 4 July 2016
- Author, "BEPS Comes to Wall Street: How the Action Items Affect The Financial Services Sector," Bloomberg BNA Tax Management International Journal, June 2016
- Author, "Out With Audits, In With Campaigns: LB&I Reorganizes—Again," Bloomberg BNA Daily Tax Report, 3 March 2016
- Author, "The Changing Landscape of U.S. Transfer Pricing Examinations," Journal of Corporate Taxation, November/December 2014

Presentations

- Moderator, "Uncertainty in the United States and its Effect on Tax Disputes," Baker McKenzie Global Tax Disputes Forum, New York, N.Y., December 2017
- Speaker, "Practical Privilege Issues for In-House Tax Professionals," TEI New York Chapter/BakerMcKenzie Joint Evening Program, New York, N.Y., November 2017
- Speaker, "Tax Controversy Developments," TEI St. Louis Tax Workshop, November 2017
- Moderator, "Let the Audit Campaigns Begin," 7th Annual Bloomberg BNA/Baker McKenzie Global Transfer Pricing Conference, Washington, D.C., June 2017
- Speaker, "IRS Developments in the New Administration," TEI New York Chapter/Baker McKenzie Half-Day Program, New York, New York, N.Y. May 2017
- Speaker, "R&D Tax Credit Disputes," TEI New York Chapter/Baker McKenzie Half-Day Program, New York, New York, N.Y. May 2017

Baker McKenzie.

- Speaker, "Dispute Resolution: How Long is the Tunnel Before We Can See the Light?," 3rd Annual Bloomberg BNA/Baker & McKenzie Global Transfer Pricing Conference: Toronto, August 2016
- Speaker, "Recent LB&I Reorganization and the Future of Transfer Pricing Disputes," 6th Annual Bloomberg BNA/Baker & McKenzie Global Transfer Pricing Conference: Washington, D.C., June 2016
- Speaker, "Tax Disputes: Current Trends and How to Address the Coming Wave," 1st Annual Bloomberg BNA/Baker & McKenzie Global Transfer Pricing Conference: Shanghai, September 2015
- Speaker, "Tax Controversies: Developments and Resolutions," Tax Executives Institute Pittsburgh Chapter, November 2014
- Speaker, "Advising Banks and Savings Institutions in 2014," ABA Section of Taxation 2014 Midyear Meeting, Banking & Savings Institutions Committee, January 2014
- Speaker, "Hard Facts and Confusing Law: Application of the Economic Substance Doctrine," George Washington University Law School Annual Institute on Current Issues in International Taxation, December 2013
- Speaker, "Legal Ethics Panel," George Washington University Law School Annual Institute on Current Issues in International Taxation, December 2013
- Speaker, "The Handling (and Mishandling) of IRS Witnesses," ABA Section of Taxation 2013 May Meeting, Civil and Criminal Penalties Committee, May 2013