

Part IV - Items of General Interest

Qualified List of Neutrals for Arbitration under Rev. Proc. 2002-67.

Announcement 2003-3

The Internal Revenue Service has selected thirty individuals to serve as qualified neutrals available to taxpayers for arbitration under the provisions of Rev. Proc. 2002-67, 2002-43 I.R.B. 733.

BACKGROUND

The settlement initiative in Rev. Proc. 2002-67 prescribes two optional settlement methodologies for resolving cases involving Contingent Liability Transactions that are the same as or substantially similar to those described in Notice 2001-17, 2001-1 C.B. 730. Section 6 of Rev. Proc. 2002-67 provides that eligible taxpayers who have chosen the second settlement methodology, called Fast Track Dispute Resolution Procedure – Contingent Liability Cases, are obligated to proceed to binding arbitration to resolve any issues not resolved during the accelerated settlement negotiations. Section 7.05 of Rev. Proc. 2002-67 states that the Service will develop a qualified list of neutrals available to serve as arbitrators. Taxpayers entering into binding arbitration are required to select three candidates from the qualified list and rank them in order of preference. The Administrator of the arbitration process will then arrange for the hiring of one of the candidates chosen by the taxpayer, based on availability and order of preference.

QUALIFIED LIST OF NEUTRALS

Working closely with the American Arbitration Association, the Internal Revenue Service has determined that the qualified list of neutrals, as described in Section 7.05 of Rev. Proc. 2002-67 shall consist of the following individuals:

Scott Adams of Scott G. Adams, Esq., P.C., East Boothbay, Maine
Loretta Argrett of Howard Law School, Washington, D.C.
Jerald Beer of Boose, Casey, Ciklin, Lubitz, Martens, McBane & O'Connell, West Palm Beach, Florida
Iris June Brown of Rogin, Nassau, Caplan, Lassman & Hirtle, LLC, Hartford, Connecticut
James E. Bye of Holme Roberts & Owen, Denver, Colorado
William Chandler of Urbach Kahn & Werlin Advisors, Inc., New York, New York
William Cooney of the Cooney Law Firm, Augusta, Georgia
Michael S. Feldman of Michael S. Feldman, P.C., Farmington Hills, Michigan
Ronald Fiedelman of Philip Vogel & Co., P.C., Dallas, Texas
Charles Froehlich, Jr. of the Charles W. Froehlich Corp., San Diego, California
Robert Glaser of Arter & Hadden (retired), Cleveland, Ohio
Larry Ray Green of Charlotte, North Carolina, Self-employed

Daniel Gulden of Atlanta, Georgia, Self-employed
Paul Gutterman of the University of Minnesota, Minneapolis, Minnesota
Robert S. Haft of Mercedes Medical, Inc., Sarasota, Florida
Stewart Hancock, Jr. of Hancock & Estabrook, LLP, Syracuse, New York
Lawrence Kaplan of Solomon, Ward, Seidenwurm & Smith, LLP, San Diego,
California
Gordon Klein of the University of California at Los Angeles, Calabasas, California
Donald Korb of Thompson Hine LLP, Cleveland, Ohio
Bruce Lane of Nixon Peabody, LLP, Washington, D.C.
Robert Lord of Berens, Kozub & Lord PLC, Scottsdale, Arizona
Julie McGuire of Hull McGuire, P.C., Pittsburgh, Pennsylvania
Hugh Morgan of Morgan & Associates, Inc., Cleveland, Ohio
Michael O'Brien of Leonard, O'Brien, Wilford, Spencer & Gale, Ltd., St. Paul,
Minnesota
Michele O'Brien of the Law Office of Michele O'Brien, P.C., Houston, Texas
William Raby of the Raby Law Office, Tempe, Arizona
Rufus Rhoades of Los Angeles, California, Self-employed
Gregory Rockwell of Bellevue, Washington, Self-employed
Albert Sturtevant of Washington, D.C., Self-employed
Bruno Tassone of Chicago, Illinois, Self-employed

CONTACT INFORMATION

For information regarding this Announcement, including further information about the selected neutrals, call Jo Ann Prager, Manager at (202) 283-8445 (not a toll-free call) or Sandy Cohen, Appeals Program Analyst at (202) 694-1818 (not a toll-free call). Ms. Prager may also be reached by fax at (202) 283-8406, electronically at otsa@irs.gov, or by mail at Office of Tax Shelter Analysis ("OTSA"), LM:PFTG:OTSA, Attn: 351, 1111 Constitution Ave., N.W., Washington, DC 20224. Please include "Revenue Procedure 2002-67" in the subject line of any electronic communication.