CONTINUING LEGAL EDUCATION

THE BAR ASSOCIATION OF SAN FRANCISCO

presents

Navigating FTB and CDTFA Settlement Programs

Best Practices and Practical Guidance from Government Decision-Makers (Rebroadcast)

Tuesday
December 1, 2026

MCLE Registration: 11:30 a.m. - 12:00 p.m.
Virtual Program: 12:00 - 1:30 p.m.

Speakers

Katie Lien
California Department of Tax and Fee Administration, Settlement Section

Ciro Immordino
California Franchise Tax Board, Settlement Bureau

Moderator

Jim Davenport
RSM US

Topics

- Eligibility and Timing: When a case is ripe for settlement and how timing affects leverage, hazards of litigation, and internal approval pathways
- Evaluating Hazards of Litigation: How FTB and CDTFA assess risk, including evidentiary strength, legal uncertainty, and resource considerations
- Documentation and Substantiation: What makes a credible settlement proposal—key records, narratives, and common deficiencies
- Procedural Pathways: Differences between informal resolution, settlement bureaus, and appeals; how processes diverge between FTB and CDTFA
- Negotiation Dynamics: Practical insights on framing offers, managing expectations, and engaging with agency personnel
- Post-Settlement Considerations: Closing agreements, compliance follow-through, and implications for future audits or reporting

MCLE: 0.75 Hour of Taxation Law Specialization (pending)

To receive MCLE credit, you must sign in during the designated MCLE registration period. This activity is approved for Minimum Continuing Legal Education credit by the State Bar of California.
BASF is a certified provider. Provider #103

Location

Virtual
Zoom link will be provided prior to the program.

Cost

$50 BASF Member
$75 All Others
All prices increase $10 on the day of the program.

Pre-registration is required.

Viewing Options



Rebroadcast Program available, register at www.sfbar.org



Webcast Recording will be available. Register separately on our online platform.

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