

# Tax Supplement

1. Name of Firm

\_\_\_\_\_

2. Please provide the following information for all Attorneys engaged in taxation work in the last (5) years.

NAME	NUMBER OF YEARS OF EXPERIENCE IN THE SPECIALTY	% OF THE DEVOTED TO THE SPECIALTY

3. With respect to taxation work undertaken in the last (5) years, please indicate what percentage of the gross fees from taxation were derived from each of the following:

- a) investment counselor services \_\_\_\_\_ %
  - b) opinions on tax shelters \_\_\_\_\_ %
  - c) opinions involving private placement memoranda \_\_\_\_\_ %
  - d) all other tax related work \_\_\_\_\_ %
- 100%

4. With respect to each of the answers to question 3 above, please provide on a separate sheet a narrative description of the services provided.

5. During the past three years has your firm helped create, or write an opinion supporting, a transaction, whose primary purpose was to reduce federal taxes, where the tax saved, or to be saved, was \$1 million or more? Yes \_\_\_ No \_\_\_

*If yes, specify the number of such transactions and the aggregate amount of taxes saved or to be saved. Please include the following types of transactions:*

- a. Use of grantor trusts to realize capital gains;
- b. Currency trades, and currency option trades, to generate losses;
- c. Devices to delay taxes on stock option gains;
- d. Devices to offset gains from the sale of a business or other assets;
- e. Use of "split dollar" or "split premium" insurance;
- f. "Potentially abusive tax shelters," as that term is used by the IRS;
- e. Any other devices sometimes referred to as "tax shelters."

6. During the past five years has the IRS challenged transactions of clients of your firm of the type described in No. 1 above, where your firm participated in, or opined on, the transaction? Yes \_\_\_ No \_\_\_

*If yes, list the dollar amount in dispute and the status or ultimate disposition of each such challenge?*

7. During the past five years has your firm been served by the IRS with an administrative summons, sometimes referred to as a "promoter summons"? Yes \_\_\_ No \_\_\_

*If yes, what was the disposition of the summons?*

8. Has your firm been the subject of any other federal, state, or local government proceeding regarding transactions of the sort described in No. 1 above? Yes \_\_\_ No \_\_\_

*If yes, list and describe any such proceeding and its status or ultimate disposition.*

I understand that the information provided herein becomes part of the firm's Professional Liability Application and is subject to the same representations and conditions.

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Position/Capacity