Department of the Treasury

Internal Revenue Service Office of Chief Counsel



November 6, 2000

Subject: 2000 National Awards Program Cancel Date: After Reading

### **Purpose**

Award recipients for 2000 National Awards are listed below:

### **ADVISORY OPINIONS AWARD**

John F. Eiman Special Litigation Assistant, GS-905-15 Houston District Counsel

Francis C. Inserra Technical Assistant to the Associate Chief Counsel (GLS), GS-905-15 Associate Chief Counsel (General Legal Services)

Peter K. Reilly Trial Attorney (Tax), GS-905-14 Administrative Provisions & Judicial Practice Associate Chief Counsel (Procedure & Administration)

### LITIGATION AWARD

Nancy B. Herbert Special Trial Attorney, GM-905-15 Regional Counsel, Northeast Region

Filing Instructions: Binder Part (30)	Master Sets: NO R	0
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### Blue Cross/Blue Shield Litigation Team:

This trial team successfully persuaded the Tax Court that savings relating to coordination of benefits between health insurers are not "estimated salvage recoverable" and that the claimed special deductions are not allowed under the safe harbor rule of Treas. Reg. 1.832-4(f)(2). This opinion establishes significant precedent.

Stephanie R. Jensen Senior Attorney (Tax), GS-905-14 North Texas District Counsel

Nancy V. Knapp Trial Attorney(Tax), GS-905-14 Associate Chief Counsel (Financial Institutions & Products)

Charles W. Maurer Jr.
Senior Attorney (Tax), GS-905-14
New England District Counsel

Michael C. Prindible Special Trial Attorney, GS-905-15 Regional Counsel, Midstates Region

Robert D. Quintana Paralegal Specialist, GS-950-11 Regional Counsel, Midstates Region

John S. Repsis Special Litigation Assistant, GS-905-15 North Texas District Counsel

#### Neonatology Team:

This team received a favorable decision in a case involving an abusive benefit plan arrangement. This far reaching opinion will significantly enhance enforcement efforts.

Randall P. Andreozzi Senior Attorney (Tax), GS-905-14 Upstate New York District Counsel

Mark A. Ericson Senior Attorney (Tax), GS-905-14 Area Counsel (Tax Exempt/Government Entities) Northeast Mid-Atlantic Area

Peter J. Gavagan Senior Attorney (Tax), GS-905-14 Area Counsel (Tax Exempt/Government Entities) Northeast Mid-Atlantic Area Matthew I. Root Senior Attorney (Tax), GS-905-14 Upstate New York District Counsel

### **TECHNICAL GUIDANCE AWARD**

Philip L. Garlett Senior Technician Reviewer, GS-905-15 Associate Chief Counsel (International)

## Innocent Spouse Team:

This team is being recognized for their exceptional efforts at successfully implementing the new "innocent spouse" provisions of I.R.C. 6015 (one of the centerpieces of the RRA 1998).

Richard L. Carlisle Branch Chief, GM-905-15 Associate Chief Counsel (Income Tax & Accounting)

Bridget E. Finkenaur Attorney-Adviser (Tax), GS-905-13 Administrative Provisions & Judicial Practice Associate Chief Counsel (Procedure & Administration)

Patricia A. Manasevit Trial Attorney (Tax), GS-905-14 Administrative Provisions & Judicial Practice Associate Chief Counsel (Procedure & Administration)

Helen F. Rogers Trial Attorney (Tax), GS-905-14 Division Counsel/Associate Chief Counsel (Tax Exempt/Government Entities)

Judith M. Wall
Branch Chief, GM-905-15
Administrative Provisions & Judicial Practice
Associate Chief Counsel (Procedure & Administration)

### Q-Sub Team:

This team is being recognized for developing and publishing these complicated subchapter S regulations. The Q-sub regulations are one of the most significant projects published in the subchapter S area.

Sharon Galm Senior Technician Reviewer, GM-905-15 Associate Chief Counsel (Financial Institutions & Products) Michael N. Kaibni Attorney-Adviser (Tax), GS-905-12 Associate Chief Counsel (Corporate)

Dianna K. Miosi Branch Chief, GM-905-15 Associate Chief Counsel (Passthroughs & Special Industries)

David J. Sotos Attorney-Adviser (Tax), GS-905-14 Associate Chief Counsel (Passthroughs & Special Industries)

Jeanne M. Sullivan Attorney-Adviser (Tax), GS-905-14 Associate Chief Counsel (Passthroughs & Special Industries)

Charles M. Whedbee Senior Technician Reviewer, GM-905-15 Associate Chief Counsel (Corporate)

Craig R. Wojay Attorney-Adviser (Tax), GS-905-14 Associate Chief Counsel (Financial Institutions & Products)

## ATTORNEY OF THE YEAR (JAMES E. MARKHAM) AWARD

Andrew J. Keyso Jr. Attorney-Adviser (Tax), GS-905-13 Administrative Provisions & Judicial Practice Associate Chief Counsel (Procedure & Administration)

William H. Quealy, Jr. Special Trial Attorney, GS-905-15 Southern California Associate District Counsel

# MANAGER OF THE YEAR (EMORY L. LANGDON) AWARD

Barbara A. Felker Branch Chief, GM-905-15 Associate Chief Counsel (International)

Valerie K. Liu Associate District Counsel, GM-905-15 Southern California Associate District Counsel Mary Helen Weber Assistant Regional Counsel (Large Case), GM-905-15 Regional Counsel, Northeast Region

### SUPPORT SERVICES AWARD

Margarita Espinoza Acting Head Secretary, GS-318-8 Central California District Counsel

Carolyn R. Johnson Section Chief, Management Analyst, GS-343-10 Associate Chief Counsel (Procedure & Administration)

Vanessa C. G. Jowers Administrative Officer, GS-341-11 Division Counsel/Associate Chief Counsel (Tax Exempt/Government Entities)

Marilyn A. Mackey Office Manager, GS-301-11 Rocky Mountain District Counsel

Mary Ellan Regets
Paralegal Specialist, GS-950-11
Associate Chief Counsel (General Legal Services)

## **TEAM AWARD**

#### AMCOR Team:

This trial team is recognized for its exceptional accomplishments involving a large shelter project involving months of preparation and litigation.

Anne W. Durning Senior Attorney (Tax), GS-905-14 Southwest District Counsel

Guy H. Glaser Senior Attorney (Tax), GS-905-14 Southern California District Counsel

Alice M. Harbutte Senior Attorney (Tax), GS-905-14 Rocky Mountain District Counsel Zachary W. King Senior Attorney (Tax), GS-905-14 Southern California District Counsel

William H. Quealy, Jr. Special Trial Attorney, GS-905-15 Southern California Associate District Counsel

Laurel M. Robinson Senior Attorney (Tax), GS-905-14 Northern California District Counsel

Henry T. Schafer
Special Litigation Assistant, GS-905-15
Pacific-Northwest District Counsel

Alan Summers Special Trial Attorney, GM-905-15 Pacific-Northwest Associate District Counsel

## Corporate Tax Shelter Team:

This team is being recognized for their work on issuing several notable tax shelter guidance projects and in shutting down various tax shelter schemes which have significantly changed the environment for corporate tax shelters.

Mary E. Carchia (Collins)
Attorney-Advisor (Tax), GS-905-14
Associate Chief Counsel (Passthroughs & Special Industries)

Daniel F. Carmody Attorney-Advisor (Tax), GS-905-13 Associate Chief Counsel (Passthroughs & Special Industries)

Catherine A. Moore Attorney-Advisor (Tax), GS-905-12 Associate Chief Counsel (Passthroughs & Special Industries)

William P. O'Shea Branch Chief, GM-905-15 Associate Chief Counsel (Passthroughs & Special Industries)

David A. Shulman Attorney-Advisor (Tax), GS-905-12 Associate Chief Counsel (Passthroughs & Special Industries) Donna M. Young Senior Technician Reviewer, GS-905-15 Associate Chief Counsel (Passthroughs & Special Industries)

## **EEO AWARD**

Richard R. Thomas Paralegal Specialist, GS-950-11 Associate Chief Counsel (International)

RICHARD J. MIHELCIC
Associate Chief Counsel
(Finance and Management)