

Practice Areas

- Tax Controversy & Litigation
- Tax
- Criminal Tax Defense
- Federal White Collar Crime Defense
- State and Local Tax Planning & Controversy

Education

- University of Texas at Austin, B.A., 1974
- University of Texas at Austin, J.D., 1977

Honors

- Jules Ritholz Memorial Merit Award from the American Bar Association Tax Section Civil and Criminal Tax Penalties Committee, 2022
- Named to "Most Admired CEOs" by Houston Business Journal, 2021
- Bruce I. Hochman Award at UCLA Tax Controversy Institute, 2020
- Named a "Texas Tax Legend" by the State Bar of Texas, 2019

Larry A. Campagna

Managing Shareholder
Houston

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Larry Campagna has established a reputation as an authoritative litigator in matters of business litigation and white collar criminal defense, as well as federal, state and local tax controversies. For more than 45 years, he has resolved thousands of civil and criminal litigation matters, many of which involved sophisticated and complex legal issues that established precedent in courts at the federal, state and local levels.

Highlights of Mr. Campagna's career include: representing the first taxpayer to be awarded attorneys' fees by the Fifth Circuit Court of Appeals; serving as lead counsel in one of the largest project cases in the history of the United States Tax Court; and successfully defending one of the world's largest accounting firms in a tax malpractice case.

Mr. Campagna teaches a course in the law of Tax Crimes and Money Laundering as an Adjunct Professor at the University of Houston Law Center. Larry is also currently serving as President of the American College of Tax Counsel for the 2023 to 2024 year. The College is made up of approximately 700 of the top tax attorneys in the country, and the Fellows of the College devote their time to filing amicus briefs in important cases and taking on other projects to improve the tax system. He has also served the American Bar Association Section of Taxation as Chair of the Employment Taxes Committee; as Chair of the Subcommittee on IRS Investigations and Procedures of the Committee on Civil and Criminal Tax Penalties; and as Chair of a Task Force on Offshore Credit Card Cases of the Civil and Criminal Tax Penalties Committee.

Significant Cases

- In *Johnson v. Sawyer*, we battled for 15 years against the IRS to obtain damages for the wrongful disclosure of Mr. Johnson's confidential tax information. The Government eventually paid Mr. Johnson the nation's largest settlement for wrongfully disclosing tax return information.

- Listed, Chambers USA: America's Leading Lawyers for Business, 2009-present
- Listed, The Legal 500 U.S. - Tax Controversy as one of the country's leading federal tax litigators in The Legal 500 U.S., 2007-present
- Listed, The Legal 500 U.S. - Tax Controversy - Hall of Fame, 2022
- Named a "Texas Super Lawyer," 2003-present
- Fellow, American College of Tax Counsel (unanimously inducted), 1995
- Listed in Best Lawyers in America, 2010-present
- Named "Lawyer of the Year" for Houston for Litigation and Controversy - Tax by Best Lawyers in America, 2014 and 2016
- Named a "Top Lawyer" by Houstonia Magazine, 2022

Bar Admissions

- Texas

Court Admissions

- United States Supreme Court
- Supreme Court of Texas

Larry A. Campagna, *Continued*

- We served as lead counsel in one of the largest project cases in the history of the United States Tax Court, which involved over 2000 Petitioners and posed strategic and logistical challenges for both the taxpayers and the IRS. Our firm represented over 700 of the taxpayers and negotiated settlements on behalf of those taxpayers as well as generic settlements that could be applied to others with Hillcrest cases.
- We represented the first taxpayer to be awarded attorneys' fees by the United States Court of Appeals for the Fifth Circuit.

Publications

- **The BBA Rules are Coming;** Oil & Gas Financial Journal/November 2017
- **Tax Crimes: Cases & Materials;** Casebook co-authored with John A. Townsend, Steve Johnson and Scott A. Schumacher, 2nd Edition published 2015 by Lexis-Nexis
- **The Eggshell Audit, Part II: Indicators of Fraud and IRS Fraud Development Procedures;** Co-Authored with Caroline Ciralo and Eric Green; CCH Journal of Tax Practice & Procedure, March 2013
- **The Eggshell Audit, Part I: A Primer;** Co-Authored with Caroline Ciralo and Eric Green; CCH Journal of Tax Practice & Procedure, July 2012
- **Tax Controversies and Tax Litigation Update: Enforcement Issues Regarding Undisclosed Interests in Offshore Financial Accounts;** Co-Authored with Scott D. Michel and Charles R. Rettig; New York University Annual Institute on Federal Taxation 2012
- **But I Relied On My Accountant! The Scope of the Reasonable Cause Defense to Penalties;** CCH Journal of Tax Practice & Procedure, August-September 2012
- **Tax Crimes: Cases & Materials;** Casebook co-authored with John A. Townsend, Steve Johnson and Scott A. Schumacher, published 2008 by Lexis-Nexis
- **Deadline for Offshore Voluntary Compliance Initiative is April 15;** Houston Business Journal Article, March 2003
- **Riddles Raised by Those Who Don't Read: Solving Purported Problems with the Right of Contribution Under I.R.C. § 6672(d);** Journal of Tax Practice and Procedure, February – March 2003
- **Legal Surfing: Basics of the Internet for Lawyers;** Texas Institute for Continuing Legal Education, 1998

- United States Courts of Appeals for the Fifth, Ninth, Eleventh and Federal Circuits
- United States Court of Federal Claims
- United States Tax Court
- United States District Courts for the Southern, Northern, Eastern, and Western Districts of Texas

Larry A. Campagna, *Continued*

Recent Lectures, Panels and Articles (Partial Listing)

- **Sentencing Guidelines: How To Best Represent Your Client In Light Of Recent Developments**, ABA National Institute on Criminal Tax Fraud, December 2023
- **Recent United States Initiatives to Enforce Integrity**; 40th International Symposium on Economic Crime, Cambridge, England/September 2023
- **Navigating the Income Tax Consequences of Gambling**; American Bar Association Section of Taxation, Washington/May 2023
- **Ethics Issues Presented by Conflicts of Interest in Tax Cases – Caution is the Watchword**; ABA National Institute on Criminal Tax Fraud, Las Vegas/December 2022
- **Tax Controversy Update**; 82nd NYU Institute on Federal Taxation, San Diego/November 2022
- **Professionals and Potential for Abuse of Trust, a U.S. and U.K Perspective**, Panel presentation at the 39th Cambridge International Symposium on Economic Crime, Cambridge, England/September 2022
- **What Does Enforcement Look Like Today?**; University of Texas Law 69th Annual Taxation Conference/December 2021
- **Sensitive Audits: Ethical Considerations**; 38th Annual ABA National Institute on Criminal Tax Fraud, Las Vegas/December 2021
- **IRS Criminal Tax Bootcamp**; Panel presentation by three taxpayer defense counsel to over 300 IRS Fraud personnel/Webinar, March 2021
- **From the Experts: Tax Controversy and Tax Litigation**; 79th NYU Institute on Federal Taxation, Webinar/November 2020
- **Handling the Case of the High Income Non-Filer—What to do....What to do?**; UCLA Tax Controversy Institute, Webinar/October 2020
- **Voluntary Disclosure and Addressing the Sins of the Past: Ethical and Other Considerations**; 36th Annual ABA National Institute on Criminal Tax Fraud, Las Vegas/December 2019
- **Sounds Reasonable to Me: Defending Penalties with Reasonable Cause**; Southern Federal Tax Institute, Atlanta, GA/October 2019, Houston IRS CPA Society, Houston/September 2019

Larry A. Campagna, *Continued*

- **Cooperation or Compulsion: The Emerging U. S. Experience with Voluntary and Involuntary Disclosures of Foreign Transactions;** London CISOEC Panel, Cambridge UK/September 2019, 36th International Symposium on Economic Crimes, Cambridge, England/September 2019
- **It Still Takes a Village: Balancing Professionalism, Privileges and Advocacy In Tax Controversies;** Houston IRS CPA Society, Houston/September 2019, State Bar of Texas Annual Meeting, Austin/June 2019
- **Advising Non-Compliant Taxpayers: When Is the Updated Voluntary Disclosure Practice the Best Choice?;** NYU Tax Controversy Forum, New York/June 2019
- **Domestic Hot Topics in Tax Enforcement;** Federal Bar Association Tax Conference, Washington, D.C./March 2019
- **Tax Controversy Update;** Texas Society of CPAs Tax Expo, Sugar Land/January 2019

- **Domestic and Foreign Voluntary Disclosures In a Post-Program World;** 35th Annual ABA National Institute on Criminal Tax Fraud, Las Vegas/December 2018

- **Finding Out You Have Been Given Bad Tax Advice: Circle the Wagons or Be Transparent;** Tennessee Federal Tax Institute, Nashville/November 2018, CHWWA Annual Seminar, Houston/November 2017, Tulane Tax Institute, New Orleans/November 2017

- **Skills Workshop: Preparing Your Client (the Taxpayer) for the Government Interview;** American Bar Association Section of Taxation, Atlanta/October 2018

- **From the Experts: Tax Controversy and Tax Litigation Update –**

Tips from the Tax Trenches; 77th NYU Institute on Federal Taxation, New York/October 2018

- **Tax Controversy: Current Developments and Hot Topics in 2018;** Chamberlain Hrdlicka 41st Annual Tax and Business Planning Seminar, Houston/October 2018, Texas Society of CPAs Tax Expo, Sugar Land/January 2018

- **Unexplained Wealth in the U.S.: The USA Flexes Its Muscle;** 36th International Symposium on Economic Crime, Cambridge, England/September 2018

- **The IRS Voluntary Disclosure Program Past, Present and Future;** NYU Tax Controversy Forum, New York/June 2018

- **Sentencing and Incarceration Considerations;** 34th Annual ABA National Institute on Criminal Tax Fraud, Las Vegas/December 2017

- **Sentencing and Incarceration Considerations;** American Bar Association 34th National Institute on Criminal Tax Fraud, Las Vegas/December 2017

Larry A. Campagna, *Continued*

- **From the Experts: IRS Representation Tools, Techniques, and Defensive Strategies – Civil & Criminal Tax Update;** 76th NYU Institute on Federal Taxation, San Francisco/November 2017, 76th NYU Institute on Federal Taxation, New York/October 2017
- **But It's Not my Fault: Developing a Reasonable Cause Defense to Penalties;** NYU Tax Controversy Forum, New York/June 2017
- **A Civil Discussion about Criminal Tax Fraud;** Texas Federal Institute, San Antonio, Texas/June 2017
- **Finding Out You Have Given Bad Tax Advice: Circle the Wagons or Be Transparent?;** Tulane Tax Institute, New Orleans/November 2017, CHWWA 40th Annual Tax and Business Planning Seminar, Houston/November 2017
- **But It's Not My Fault! Developing a Robust Reasonable Cause Defense to Penalties;** 9th Annual NYU Tax Controversy Forum, New York/June 2017
- **Tax Controversy: Current Developments and Hot Topics;** Texas Society of CPAs Tax Expo, Sugar Land/January 2017
- **Ask the Experts: Top Tips for Criminal Tax Cases;** American Bar Association 33rd National Institute on Criminal Tax Fraud, Las Vegas, December 2016
- **Enforcement Tools for Employment Tax Obligations;** American Institute on Federal Taxation, Birmingham/November 2016
- **Tax Controversies: Tips from the Tax Trenches--Everything Is Fine . . . Until It Isn't;** 75th NYU Institute on Federal Taxation, New York/October 2016; San Diego/November 2016
- **It Still Takes A Village: Balancing Professionalism, Privileges, And Advocacy In Tax Controversies;** 2016 Tennessee Federal Tax Conference, Nashville/October 2016, Institute of Management Accounts, Houston Magnolia Hotel/May 2016, Tulane Tax Institute, New Orleans/October 2015, Florida Tax Institute, Tampa/April 2015, Southern Federal Tax Institute, Atlanta/October 2014, CHWWA 37th Annual Tax and Business Planning Seminar, Houston/October 2014
- **Ethics and the Boundaries of Zealous Advocacy;** Tax Executives Institute Annual Meeting, Philadelphia/October 2016
- **Liability U.S. Style – How the U.S. Decides Whether to Prosecute Organizations and Individuals in Criminal Tax and Money Laundering Cases;** 33rd International Symposium on Economic Crimes, Cambridge, England/September 2016
- **How to Stop a Civil Audit from Becoming a Criminal Prosecution;** NYU Tax Controversy Forum, New York/June 2016
- **Preparing Witnesses: The Good, Bad & Ugly;** Tax Executives Institute Audit and Appeals Seminar, Boston/June 2016, Tax Executives Institute Audit and Appeals Seminar, San Francisco/May 2015, Chamberlain, Hrdlicka, White, Williams & Aughtry 37th Annual Tax & Business Planning Seminar, Houston/November 2014, Tax Executives Institute Audit and Appeals Seminar,

Larry A. Campagna, *Continued*

Chicago/May 2014

- **The Panama Papers;** Houston Bar Association – International Law Section/May 2016
- **Offshore: What Should The Non-Compliant Accountholders Be Doing;** American Bar Association National Institute on Criminal Tax Fraud, Las Vegas/December 2015;
- **Tax Controversy Update;** Texas Society of CPAs Tax Expo, Sugar Land/January 2016
- **Eggshell Audits: Handling IRS Examinations When There Are Potential Criminal Issues;** Texas Society of CPAs Tax Expo, Sugar Land/January 2015, University of Texas Taxation Conference, Austin/December 2015, State Bar of Texas Advanced Tax Law Course, Houston/October 2015
- **From the Experts: IRS Tools, Techniques and Defensive Strategies – Civil and Criminal Tax Update;** 74th NYU Institute on Federal Taxation, New York/October 2015; San Francisco/November 2015
- **The Accountant’s Role in a Criminal Tax Investigation;** New England IRS Representation Conference, Foxwoods/November 2015
- **The New IRS 8300 BSAExam: From Routine Compliance to Criminal Prosecution;** New England IRS Representation Conference, Foxwoods/November 2015
- **Employee Vs. Independent Contractor: Ready For The Battle?;** Chamberlain, Hrdlicka, White, Williams & Aughtry 38th Annual Tax & Business, Planning Seminar, Houston/November 2015
- **Looking Back and Looking Forward: Lessons of the Past and What They Predict for the Tax Practice of the Future;** Chamberlain, Hrdlicka, White, Williams & Aughtry 35th Annual Tax & Business, Planning Seminar, Houston/November 2012
- **Breaking Up Is Hard to Do: Protecting Divorcing Spouses from the IRS and Each Other;** Houston Volunteer Lawyers Program Family Law Seminar, Houston/October 2015, American Bar Association Section of Taxation Mid-Year Meeting, Houston/January 2015, 2013 AICPA Tax Planning, Compliance and Controversy Conference, Las Vegas/May 2013
- **Taxpayer Filing Status: Options and Recent Law;** American Bar Association Joint Fall Meeting, Chicago/September 2015
- **Compliance in the 21st Century - U.S. Enforcement Efforts in the First Fifteen Years of the Century and Beyond;** 33rd International Symposium on Economic Crimes, Cambridge, England/September 2015
- **Coming Into Compliance: Representing Taxpayer with Unreported Foreign Assets;** NYU Tax Controversy Forum, New York/June 2015

Larry A. Campagna, *Continued*

- **Emerging Issues for Tax Practitioners with Respect to the Attorney-Client Privilege**; American Bar Association Section of Taxation Webinar/April 2015
- **Appeals and Administrative Alternative Resolutions**; American Law Institute CLE Handling a Tax Controversy: Audit, Appeals, Litigation, & Collections, Washington/October 2014
- **Life of a Criminal Tax Case: Investigation Stage**; 39th FBA Annual Tax Law Conference Enforcement and Criminal Tax Symposium, Washington/March 2015
- **Eggshell Audits: Handling IRS Examinations Of Closely Held Businesses When There Are Criminal Tax Issues In The Closet**; Texas Society of CPAs Tax Expo, Sugar Land/January 2015
- **Appeals & Administrative Alternative Resolution**; American Law Institute CLE, Washington/October 2014
- **The Compliance Perfect Storm: Voluntary Disclosure, Investigations of Offshore Financial Entities and FACTA**; American Bar Association Section of Taxation, Washington/May 2014, 32nd International Symposium on Economic Crimes, Cambridge, England/September 2014
- **From the Experts: Civil and Criminal Tax Controversy and Tax Litigation Update**; 73rd NYU Institute on Federal Taxation, New York/October 2014; San Francisco/November 2014
- **Department of Justice Update**; 6th Annual NYU Tax Controversy Forum, New York/June 2014
- **Tax Controversy Workshop -- The Accountant as Viewed from the Bench: A Good Excuse or Co-Conspirator?**; AICPA National Tax Controversy Conference, Washington/November 2013
- **Private Public Partnerships To Combat Tax Evasion And Money Laundering - The U.S. Perspective**; 31st International Symposium on Economic Crimes, Cambridge, England/September 2013
- **Reporting Foreign Assets, Foreign Financial Accounts, and Cash Transactions**; 2013 IRS Nationwide Tax Forum, New Orleans/August 2013
- **Hot Issues Under Circular 230 – A Dialogue with the Director**; State Bar of Texas Advanced Tax Law Institute, Houston/August 2013
- **Tax Enforcement Priorities – What’s Happening Now?** NYU Tax Controversy Forum, New York/June/2013
- **Hot Topics in Tax Enforcement**; TSCPA Business & Industry Committee May Conference, Houston/May 2013; Houston CPA Society Tax Expo, Houston/January 2013
- **Preparing and Arguing Your Case in IRS Appeals**; 2013 AICPA Tax Planning, Compliance and Controversy Conference, Las Vegas/May 2013
- **Ask the Tax Controversy Expert**; 2013 AICPA Tax Planning, Compliance and Controversy Conference, Las Vegas/May 2013
- **Breaking Up Is Hard to Do: Protecting Divorcing Spouses from the IRS and Each Other**; 2013 AICPA Tax Planning, Compliance and Controversy Conference, Las Vegas/May 2013

Larry A. Campagna, *Continued*

- **Closing the Audit: Appeals & Beyond;** Tax Executives Institute, Seminar on IRS Audits and Appeals, Orlando/April 2013; Tax Executives Institute, Seminar on IRS Audits and Appeals, Orlando/February 2011; Tax Executives Institute, Seminar on IRS Audits and Appeals, Chicago/May 2010; Tax Executives Institute, Seminar on IRS Audits and Appeals, Chicago/May 2009
- **Eggshell Audits: Handling IRS Examinations of Closely Held Businesses When There are Criminal Tax Issues;** Dallas Bar Association Section of Taxation, Dallas/January 2013; Chamberlain, Hrdlicka, White, Williams & Aughtry 35th Annual Tax & Business Planning Seminar, Houston/November 2012
- **Current U. S. Tax Enforcement Priorities in an Evolving Global Environment;** 29th American Bar Association Annual National Institute on Criminal Tax Fraud, Las Vegas/December 2012
- **Third Party Records and the Firth Amendment: What Happens Next;** 29th American Bar Association Annual National Institute on Criminal Tax Fraud, Las Vegas/December 2012
- **Ethics – It’s a Brave New World: The Changing Ethics of Counseling Clients in Light of Recent Voluntary Disclosure Initiatives;** Chamberlain, Hrdlicka, White, Williams & Aughtry 34th Annual Tax Planning & Business Seminar, Houston/November 2012; Houston CPA Society Tax Expo, January 2012; Tulane Tax Institute, New Orleans/October 2011
- **From the Experts: Tax Controversy in Tax Litigation Update;** 71st NYU Institute on Federal Taxation, New York/October 2012; San Diego/November 2012
- **Economic Crime – Surviving the Fall; The Myths and Realities;** 30th International Symposium on Economic Crime, Cambridge, England/September 2012
- **Criminal Tax Process – IRS and Investigation Stage;** Federal Bar Association 36th Annual Tax Law Conference, Washington, D.C./March 2012
- **Eggshell Audits: Strategies for the Taxpayer’s Counsel;** American Bar Association Section of Taxation, Washington, D.C./May 2012
- **Preparing and Arguing Your Case in IRS Appeals;** First Annual AICPA Conference on Tax Controversy, Las Vegas/May 2012
- **Employee or Independent Contractor? Same Song, New Verse;** First Annual AICPA Conference on Tax Controversy, Las Vegas/May 2012
- **Ask the Tax Controversy Experts;** First Annual AICPA Conference on Tax Controversy, Las Vegas/May 2012
- **Trends in IRS Audits;** TSCPA Tax Expo, Galveston/June 2012; TSCPA Spring Expo, Houston/May 2012
- **But I Relied on My Accountant! The Scope of the Reasonable Cause Defense Penalties;** NYU 4th Annual Tax Controversy Forum, New York/June 2012
- **“Ask the Wizards”;** NYU 4th Annual Tax Controversy Forum, New York/June 2012
- **The Office of Professional Responsibility and Current Ethics Enforcement Priorities;** American Bar Association 28th Annual National Institute on Criminal Tax Fraud, Las Vegas/December 2011
- **Contribution Among Responsible Persons Under Section 6672(d);** University of Texas Tax Conference, Austin/December 2011
- **Tax Controversies – Tips From the Tax Trenches;** 70th NYU Institute on Federal Taxation, New York/October 2011; San Francisco/November 2011

Larry A. Campagna, *Continued*

- **Integrity Involving Domestic and Offshore Assets – U. S. Style;** 9th International Symposium on Economic Crime, Cambridge, England/September 2011
- **What's Next on the FBAR Front?;** State Bar of Texas Advanced Tax Law & Tax Law 101, Houston/August 2011
- **Update on IRS Tax Controversy Procedure: Dealing With the IRS in the Real World – Criminal Tax Issues;** ACPEN Web Broadcast, Dallas/June 2011
- **Employee or Independent Contractor: Old Issues, New Focus;** American Federal Institute on Taxation, Birmingham/June 2011
- **Criminal Enforcement of Employment Taxes -** American Bar Association Section of Taxation, Washington/May 2011
- **Offshore Tax Enforcement, Voluntary Disclosures & Undeclared Foreign Accounts;** American Bar Association Section of Taxation, Washington/May 2011
- **Ethical Issues Arising in Day-to-Day Practice;** American Bar Association Section of Taxation, Boca Raton/January 2011
- **Issues Arising out of Offshore Accounts;** American Bar Association Section of Taxation, Boca Raton/January 2011
- **Foreign Bank Account Redux: International Money Laundering and Representation;** American Bar Association Section of Taxation, Boca Raton/January 2011
- **Ask the Experts: Top Criminal Tax Practice Tips & Representation Strategies;** American Bar Association, 27th National Institute on Criminal Tax Fraud, San Francisco/December 2010
- **Coming Attractions: IRS Audit and Enforcement Priorities;** Chamberlain, Hrdlicka, White, Williams & Martin 33rd Annual Tax & Business Planning Seminar, Houston/December 2010
- **The Short Road Between Civil and Criminal Tax Fraud;** UCLA Tax Controversy Institute, Beverly Hills/October 2010
- **Qualified Offers and the Recovery of Administrative and Litigation Costs From the IRS;** UCLA Tax Controversy Institute, Beverly Hills/October 2010
- **Integrity and Accountability in the Financial Sector – U.S. Style;** 28th International Symposium on Economic Crimes, Cambridge, England/September 2010
- **Sensitive Issue Examinations – Is Twee/ Still Relevant?;** American Bar Association Section of Taxation, Toronto/September 2010
- **IRS Audit and Enforcement – Coming Attractions;** 2nd Annual NYU Tax Controversy Forum, New York/June 2010
- **Closing the Audit: Appeals & Beyond; Tax Executives Institute, Seminar on IRS Audits and Appeals,** Chicago/May 2010; Tax Executives Institute, Seminar on IRS Audits and Appeals, Chicago/May 2009
- **Stay Out of the Kitchen – Hot Topics in Tax Controversy;** Texas Society of CPAs Tax Expo, Houston/January 2010; Tennessee Federal Tax Conference, Nashville/November 2009; Texas Society of CPAs Tax Expo, Houston/January 2009
- **Prosecutorial Priorities;** American Bar Association Section of Taxation, San Antonio/January 2010
- **Contribution Among Responsible Persons Under Section 6672(d) -- Unresolved Issues;** American Bar Association Section of Taxation, San Antonio/January 2010
- **Civil Considerations During and After the Criminal Tax Investigation;** American Bar Association, 25th National Institute on Criminal Tax Fraud, San Francisco/December 2009

Larry A. Campagna, *Continued*

- **Case Study on Penetration of Financial Institutions in the United States**, 27th International Symposium on Economic Crimes, Cambridge, England/September 2009
- **Practical Considerations Involving Ongoing Voluntary Disclosures (of Offshore Accounts)**, American Bar Association Section of Taxation, Chicago/September 2009
- **Quality Control for Tax Prosecutions: How the Tax Division Decides Which Cases to Accept for Prosecution**, American Bar Association Section of Taxation, Washington/May 2009
- **Closing the Audit: Appeals & Beyond**, Tax Executives Institute, Seminar on IRS Audits and Appeals, Chicago/May 2009
- **Ethical Problems Facing the Criminal Tax Defense Lawyer**, American Bar Association, 25th National Institute on Criminal Tax Fraud, San Francisco/December 2008
- **Conflicts Check: Ethics Issues in Determining Who is the Client? What's the Scope? Should You Take the Work?**, Southern Federal Tax Institute, Atlanta/October 2009; Mississippi Tax Institute, Jackson/November 2009; University of Texas Tax Institute, Austin/November 2008; American Bar Association Section of Taxation, Washington/May 2008; Chamberlain, Hrdlicka, White, Williams & Martin 31st Annual Tax Planning Seminar, Houston/November 2008
- **When Special Agents Come Calling**, University of Florida Graduate Tax Program, Gainesville/November 2008; Tulane Tax Institute, New Orleans/October 2003; Houston Bar Association Tax Section, Houston/November 2003; Chamberlain, Hrdlicka, White, Williams & Martin 26th Annual Tax Planning Seminar, Houston/November 2003
- **Banking on Trouble-- International Money Laundering Investigations: Perils and Pitfalls for the Practitioner**; Twenty-Sixth International Symposium on Economic Crime, Cambridge, England/September 2008; American Bar Association Section of Taxation, San Francisco/September 2008
- **Employee or Independent Contractor: New Perspectives on an Old Issue**, American Institute on Federal Taxation, Birmingham/June 2008; Texas Society of CPAs Spring Expo, Houston/May 2007
- **Square Corners and Curves: Throw Your Professional Compass Away, You Need a GPS System to Navigate Now!**, Texas Society of CPAs Spring Expo, Houston/May 2008; Wednesday Tax Forum, Houston/February 2008
- **IRS War on Tax Advantaged Transactions: KPMG, Virgin Islands and More**, American Bar Association, 23d National Institute on Criminal Tax Fraud, San Francisco/December 2007
- **Employee or Independent Contractor: New Perspectives on an Old Issue**, Texas Society of CPAs Spring Expo, Houston/May 2007
- **Sentencing Update**, American Bar Association, 22d National Institute on Criminal Tax Fraud, San Francisco/December 2006
- **To Boldly Go Where No Taxpayer Has Gone: New Compliance Initiatives at the IRS**, Chamberlain Hrdlicka 29th Annual Tax Planning Seminar, Houston, November 2006; Southern Federal Tax Institute, Atlanta/September 2006
- **Appealing Trends: Developments in the IRS Office of Appeals**, Tax Executives Institute Annual Conference, Scottsdale/October 2006

Larry A. Campagna, *Continued*

- **The Civil-Criminal Whipsaw: How The Prospect Of Simultaneous Civil And Criminal Tax Cases Impacts Defense Strategies In Tax Controversies**, Houston Bar Association Section of Taxation, Houston, May 2006; Texas Society of CPAs Family Conference, Galveston, June 2006; Texas Society of CPAs Spring Expo, Houston, May 2006; State Bar of Texas, Tax Controversy Course, Houston, December 2005; Chamberlain Hrdlicka, 28th Annual Tax Planning Seminar, Houston/November 2005
- **The Importance of Zealous Advocacy in Tax Cases Under the Model Rules and Circular 230**, American Bar Association Section of Taxation, San Francisco/September 2005
- **Coping with the New Enforcement-Minded IRS**, American Federal Tax Institute, Birmingham/June 2005
- **Recent Developments Concerning Sentencing Guidelines For Federal Tax Crimes**, American Bar Association, 20th and 21st National Institutes on Criminal Tax Fraud, San Francisco/December 2004 and 2005
- **Daddy Died with A Cayman Bank Account: Riddles Wrapped in Enigmas**, Chamberlain Hrdlicka 27th Annual Tax Planning Seminar, Houston/November 2004
- **Consideration Of Potential Criminal Exposure In The Hypothetical Tax Transaction**, University of Texas Tax Institute, Houston/October 2004
- **Let Mikey Try It: Using New Programs In Dealing With The IRS**, Tax Executives Institute, San Antonio, April 2005; Tennessee Federal Tax Institute, Nashville/October 2004; Chamberlain Hrdlicka 26th Annual Tax Planning Seminar, Houston/November 2003; Southern Federal Tax Institute, Atlanta/September 2003
- **Playing The Hand You're Dealt: Preparing For Audit With The New Tax Shelter Disclosure Regulations**, Tax Executives Institute, Seminar on IRS Audits and Appeals, Las Vegas/February 2004
- **Developments in Employment Tax Prosecutions**, American Bar Association Section of Taxation, Kissimmee/January 2004
- **Update on IRS Investigations of Offshore Transactions**, American Bar Association, 19th National Institute on Criminal Tax Fraud, San Francisco/December 2003
- **When Special Agents Come Calling**, Tulane Tax Institute, New Orleans, October 2003; Houston Bar Association Tax Section, Houston/November 2003
- **Preparing an Effective Protest**, IRS Appeals Office Technical Symposium, Houston/May 2003
- **Getting The Most Out Of "LIFE"—IRS Audits & Appeals In The 21st Century**, Tax Executives Institute, Seminar on IRS Audits and Appeals, Chicago/May 2003
- **Collaboration and Confrontation: Successful Strategies for IRS Audits & Appeals**, Tax Executives Institute Mid-Year Conference, Washington/March 2003
- **Riddles Raised by Those Who Don't Read: Solving Purported Problems with the Right of Contribution Under I.R.C. § 6672(d)**, Journal of Tax Practice and Procedure, February -March 2003
- **Deadline for Offshore Voluntary Compliance Initiative is April 1**, Houston Business Journal – March 2003
- **How Sarbanes-Oxley Impacts Tax Practitioners and Are There Ethical Lessons to Learn?** Moderator, Teleconference Sponsored by American Bar Association Section of Taxation and the ABA Center for Continuing Legal Education, January 2003
- **Can Offshore Sinners Repent? The IRS Offshore Credit Card Project and the New Voluntary Disclosure Policy**, 2003 Houston Tax Forums, Houston/January 2003

Larry A. Campagna, *Continued*

- **How to Beat the IRS in a Civil/Criminal Case**, Texas Bar Association White Collar Crime Seminar, Houston/November 2002
- **When the Practitioner Becomes the Target: IRS Attacks on Tax Advisors, Transferees and Third Parties**, Southern Federal Tax Institute, Atlanta/September 2002; Texas Society of CPAs, Corpus Christi/October 2002; Houston Bar Association Tax Section, Houston/November 2002; American Women's Society of CPAs, Houston/February 2003; Chamberlain Hrdlicka 25th Annual Tax Planning Seminar, Houston/November 2002
- **Representing the Client During a Criminal Investigation: Defense Tactics During IRS Administrative and Grand Jury Investigations**, American Bar Association, 19th National Institute on Criminal Tax Fraud, San Francisco/December 2002
- **Sarbanes-Oxley for the Tax Practitioner**, American Bar Association Section of Taxation, San Antonio/January 2003
- **Handling Investigations Involving Civil/Criminal Tax Issues**, Texas Bar Association, White Collar Crime Seminar, Houston/November 2002
- **Compliance: How Transparent is Reasonable, Large and Mid-Size Business Roundtable Discussion**, UCLA Annual Tax Controversy Institute, Los Angeles/October 2002
- **A Primer on the Litigation of Federal Tax Issues**, Houston Volunteer Lawyers Association, Low Income Taxpayer Clinic, Tax Controversy Workshop, Houston/November 2003 & June 2002

Professional Affiliations

- American College of Tax Counsel: Fellow; Board of Regents, 2014-present, Vice President, 2022, Secretary- Treasurer, 2021, Chair, Nominations Committee, 2019 to 2021
 - American Bar Association, Section of Taxation: Administration, Vice-Chair, 2018-2021; Committee on Civil & Criminal Penalties, Chair, 2011-2013, Vice-Chair, 2009-2011; Liaison to Standards of Tax Practice, 2001-present; Task Force on Offshore Credit Card Cases, Chair, 2002-2008; Subcommittee on IRS Investigations & Procedures, Chair, 1992-1994; Task Force on Section 6672, Task Force on Attorneys Fee Awards; Committee on Employment Taxes, Chair, 1994-1996, Vice-Chair, 1992-1994; Chair of Subcommittee on Trust Fund Taxes, 1991-1992
 - College of the State Bar of Texas, 1990-present
 - State Bar Section of Taxation Committee for Liaison with the Comptroller of Public Accounts
 - CCH Journal of Tax Practice and Procedure: Advisory Board of Editors
- 