

NYSBA

Tax Section Annual Meeting

TUESDAY, JANUARY 26, 2016
New York Hilton Midtown
1335 Avenue of the Americas
New York City

Section Chair

David R. Sicular

Paul, Weiss, Rifkind, Wharton & Garrison LLP
New York City

MORNING PANELS
9:15 A.M. and 10:45 A.M.
Rendezvous Ballroom
and Trianon Ballroom, 3rd Floor

LUNCHEON
12:30 P.M.
Grand Ballroom, 3rd Floor

AFTERNOON PANEL
2:15 P.M.
Grand Ballroom, 3rd Floor

STATE & LOCAL MEETING
4:15 P.M.
Gibson, 2nd Floor



This program is co-sponsored by The New York Bar Foundation



SCHEDULE OF EVENTS

Morning Program

- 8:45 - 9:00 a.m.** **Business Meeting and Election of Officers**
Trianon Ballroom, 3rd Floor
Presentation by The New York Bar Foundation
- 9:15 - 10:30 a.m.** **Hot Topics in Partnership Taxation – From Partnership Audits to Fee Waiver**
Trianon Ballroom, 3rd Floor (1.5 Professional Practice)
- Panel Chair:** **Phillip J. Gall**, Ernst & Young LLP, New York City
- Panelists:** **Ossie Borosh**, Attorney-Advisor, Office of Tax Legislative Counsel,
U.S. Department of the Treasury, Washington, D.C.
- John C. Hart**, Simpson Thacher & Bartlett LLP, New York City
- Eric B. Sloan**, Gibson, Dunn & Crutcher LLP, New York City
- Clifford M. Warren**, Senior Counsel (Passthroughs & Special Industries),
Internal Revenue Service, Washington, D.C.
- 9:15 - 10:30 a.m.** **Will They Never Let You Escape This World? Discussion of recent guidance on corporate inversions, transfers of intangibles to partnerships with related foreign partners and foreign corporations, loans by CFCs to foreign partnerships, and other current international tax topics**
Rendezvous Ballroom, 3rd Floor (1.5 Professional Practice)
- Panel Chair:** **Andrew H. Braiterman**, Hughes Hubbard & Reed LLP, New York City
- Panelists:** **Yaron Z. Reich**, Cleary Gottlieb Steen & Hamilton LLP, New York City
- Danielle E. Rolfes**, International Tax Counsel, U.S. Department of the Treasury,
Washington, D.C.
- Marjorie A. Rollinson**, Deputy Associate Chief Counsel (International - Technical),
Internal Revenue Service, Washington, D.C.
- Peter F.G. Schuur**, Debevoise & Plimpton LLP, New York City
- 10:45 a.m. - 12:00 p.m.** **The World Keeps Spinning – Section 355 In Flux and other Recent Developments in Corporate Tax**
Trianon Ballroom, 3rd Floor (1.5 Professional Practice)
- Panel Chair:** **Gordon E. Warnke**, Linklaters LLP, New York City
- Panelists:** **Deborah L. Paul**, Wachtell, Lipton, Rosen & Katz, New York City
- Karen Gilbreath Sowell**, Ernst & Young LLP, Washington, D.C.
- Robert H. Wellen**, Associate Chief Counsel (Corporate),
Internal Revenue Service, Washington, D.C.
- Thomas C. West, Jr.**, Tax Legislative Counsel, U.S. Department of the Treasury,
Washington, D.C.
- 10:45 a.m. - 12:00 p.m.** **Recent Developments in N.Y. Corporate Tax Reform**
Rendezvous Ballroom, 3rd Floor (1.5 Professional Practice)
- Panel Chair:** **Irwin M. Slomka**, Morrison & Foerster LLP, New York City
- Panelists:** **Deborah R. Liebman**, Deputy Counsel, New York State Department of
Taxation and Finance, Albany, N.Y.
- Robert D. Plattner**, Deputy Commissioner for Tax Policy Analysis,
New York State Department of Taxation and Finance, Albany, N.Y.
- 2** **Jack Trachtenberg**, Reed Smith LLP, New York City

Luncheon

12:30 p.m. **Luncheon** - Grand Ballroom, 3rd Floor

Annual Report to the Tax Section
David R. Sicular, Chair, Tax Section

Luncheon Speaker: **Jason L. Furman**, Chairman, Council of Economic Advisers, Washington, D.C.

Afternoon Program

2:15 - 4:00 p.m. **Ethics: Fulfilling Your Professional Responsibility to Preserve Privilege While Getting Your Work Done**
Grand Ballroom, 3rd Floor (2.0 Ethics)

Panel Chair: **Diana L. Wollman**, Cleary Gottlieb Steen & Hamilton LLP, New York City

Panelists: **Raj Madan**, Skadden, Arps, Slate, Meagher & Flom LLP and Affiliates, Washington, D.C.

Kevin Otero, General Electric Company, Senior Tax Counsel and Director,
U.S. Federal Audit, Appeal and Litigation, Stamford, CT

Mario J. Verdolini, Davis Polk & Wardwell LLP, New York City

STATE & LOCAL MEETING

4:15 - 5:15 p.m. **High Tea with the Commissioners** - Gibson, 2nd Floor
New York State Taxation and Finance Commissioner Boone
New York State Tax Appeals Tribunal President Commissioner Nero
New York City Tax Appeals Tribunal President and New York City
Tax Commissioner Hoffman
New York City Department of Finance First Deputy Commissioner Hyman

Commissioners Boone, Nero and Hoffman and First Deputy Commissioner Hyman (and members of their senior staffs) will discuss recent changes in their respective agencies, as well as their imminent and long-term plans. In this traditionally informal forum, members of the Tax Section will be able to share their thoughts with New York's top tax officials. (This meeting is not open to the press.)

NEW YORK STATE BAR ASSOCIATION

NEW YORK STATE BAR ASSOCIATION 2015 Officers of the Tax Section Executive Committee

DAVID R. SICULAR
Chair

STEPHEN B. LAND
First Vice-Chair

MICHAEL S. FARBER
Second Vice-Chair

KAREN GILBREATH SOWELL
Secretary

IMPORTANT INFORMATION

The New York State Bar Association's Meetings Department has been certified by the NYS Continuing Legal Education Board as an accredited provider of continuing legal education in the State of New York.

Under New York's MCLE rule, this program has been approved for a total of up to **3.0 credit hours in professional practice and 2.0 credit hours in ethics**. This meeting will not qualify for credit for newly admitted attorneys because it is not a basic practical skills program.

Discounts and Scholarships: New York State Bar Association members and non-members may apply for a discount or scholarship to attend this program, based on financial hardship. This discount applies to the educational portion of the program only. Under that policy, any member of our Association or non-member who has a genuine basis of his/her hardship, if approved, can receive a discount or scholarship, depending on the circumstances. Your application must be received prior to January 13th, 2016. For more details, please contact Adriana Favreau in writing at New York State Bar Association, One Elk Street, Albany, New York 12207 or afavreau@nysba.org



Accommodations for Persons with Disabilities: NYSBA welcomes participation by individuals with disabilities. NYSBA is committed to complying with all applicable laws that prohibit discrimination against individuals on the basis of disability in the full and equal enjoyment of its goods, services, programs, activities, facilities, privileges, advantages, or accommodations. To request auxiliary aids or services or if you have any questions regarding accessibility, please contact Adriana Favreau at 518-487-5630.



For overnight room accommodations, please call the New York Hilton Midtown at 1-800-445-8667 and identify yourself as a member of the New York State Bar Association. Room rates are \$260.00 for single/double occupancy. You also can reserve your overnight room on the web at www.nysba.org/am16accomm. Reservations must be made prior to December 21, 2015.



For questions about this specific program, please contact Adriana Favreau at 518-487-5630. **For registration questions only, please call 1-800-582-2452. Fax registration form to 518-463-5993.**