

# NYSBA

## Tax Section Annual Meeting

**TUESDAY, FEBRUARY 24, 2015**  
New York Hilton Midtown  
1335 Avenue of the Americas  
New York City

**MORNING PANELS**  
**9:00 A.M. and 10:45 A.M.**  
**Rendezvous Ballroom and Trianon Ballroom, 3rd Floor**

**LUNCHEON**  
**12:45 P.M.**  
**Grand Ballroom, 3rd Floor**

**AFTERNOON PANELS**  
**2:15 P.M.**  
**Grand Ballroom and Rendezvous Ballroom, 3rd Floor**

**STATE & LOCAL MEETING**  
**4:00 P.M.**  
**Gibson, 2nd Floor**

**Section Chair**  
**David H. Schnabel**  
Debevoise & Plimpton LLP  
New York City



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



# SCHEDULE OF EVENTS

## Morning Program

8:30 - 8:45 a.m.

### Business Meeting and Election of Officers

Trionon Ballroom, 3rd Floor  
Presentation by The New York Bar Foundation

9:00 - 10:30 a.m.

### Contingent Consideration in M&A Transactions

Grand Ballroom, 3rd Floor (1.5 Professional Practice)

**Panel Chair:** **Peter F. G. Schuur**, Debevoise & Plimpton LLP, New York City

**Panelists:** **Erik H. Corwin** (Invited), Deputy Chief Counsel (Technical), Internal Revenue Service, Washington, D.C.

**Andrew W. Needham**, Cravath Swaine & Moore LLP, New York City

**John C. Hart**, Simpson Thacher & Bartlett LLP, New York City

9:00 - 10:30 a.m.

### Hot Topics in Partnership Tax

Rendezvous Ballroom, 3rd Floor (1.5 Professional Practice)

**Panel Chair:** **Eric B. Sloan**, Deloitte Tax LLP, New York City

**Panelists:** **Curtis G. Wilson** (Invited), Associate Chief Counsel (Passthroughs & Special Industries), Internal Revenue Service, Washington, D.C.

**Beverly M. Katz**, KPMG LLP, Washington, D.C.

**Amanda H. Nussbaum**, Proskauer Rose LLP, New York City

10:45 a.m. -  
12:15 p.m.

### Inversions and Notice 2014-52

Trionon Ballroom, 3rd Floor (1.5 Professional Practice)

**Panel Chair:** **Joshua M. Holmes**, Wachtell, Lipton, Rosen & Katz, New York City

**Panelists:** **Danielle E. Rolfes** (Invited), International Tax Counsel, Department of the Treasury, Washington, D.C.

**Daniel M. McCall** (Invited), Special Counsel to the Deputy Associate Chief Counsel (International-Technical) Internal Revenue Service, Washington, D.C.

**Neil J. Barr**, Davis Polk & Wardwell LLP, New York City

**Steve M. Surdell**, Ernst & Young, Chicago, IL

10:45 a.m.-  
12:15 p.m.

### New York State and City Tax Developments: Insights from the General Counsels and Current Legislative Proposals

Rendezvous Ballroom, 3rd Floor (1.5 Professional Practice)

**Panel Chair:** **Maria T. Jones**, Kramer Levin Naftalis & Frankel LLP, New York City

**Panelists:** **Amanda K. Hiller**, Deputy Commissioner and Counsel, New York State Department of Taxation and Finance, Albany

**Diana Beinart**, Deputy Commissioner and Counsel, New York City Department of Finance, New York City

**Zal A. Kumar**, Senior Legal Adviser, Tax Audit and Enforcement, New York City Department of Finance, New York City

**Deborah Liebman**, Deputy Counsel, New York State Department of Taxation and Finance, Albany

**Jack Trachtenberg**, Reed Smith LLP, New York City

# NEW YORK STATE BAR ASSOCIATION

## Luncheon

12:45 p.m.

**Luncheon** - Grand Ballroom, 3rd Floor

### **Annual Report to the Tax Section**

**David H. Schnabel**, Chair, Tax Section

**Luncheon Speaker:**

**John Koskinen**

Commissioner, Internal Revenue Service  
Washington, D.C.

## Afternoon Program

2:15 - 3:45 p.m.

### **Capital Structure Choices and How They Impact Corporate Transactions**

Trionon Ballroom, 3rd Floor (1.5 Professional Practice)

**Panel Chair:** **Karen Gilbreath Sowell**, Ernst & Young LLP, Washington, D.C.

**Panelists:** **William D. Alexander**, Skadden, Arps, Slate, Meagher & Flom LLP, Washington, D.C.

**Matthew A. Rosen**, Skadden, Arps, Slate, Meagher & Flom LLP, New York City

**Jodi J. Schwartz**, Wachtell, Lipton, Rosen & Katz, New York City

2:15 - 3:45 p.m.

### **BEPs Is Coming! BEPS Is Coming! What Do We Do Now?**

Rendezvous Ballroom, 3rd Floor (1.5 Professional Practice)

**Panel Chair:** **Kimberly S. Blanchard**, Weil, Gotshal & Manges LLP, New York City

**Panelists:** **Danielle E. Rolfes** (Invited), International Tax Counsel, Department of the Treasury, Washington, D.C.

**Michael McDonald** (Invited), Financial Economist, Department of the Treasury, Washington, D.C.

**Robert Cassanos**, Fried, Frank, Harris, Shriver & Jacobson LLP, New York City

**William G. Cavanagh**, Chadbourne & Parke LLP, New York City

## STATE & LOCAL MEETING

4:00 - 5:15 p.m.

### **High Tea with the Commissioners** - Gibson, 2nd Floor

New York State Executive Deputy Tax Commissioner Manion

New York State Tax Appeals Tribunal President & Commissioner Nero

New York City Tax Appeals Tribunal President & Commissioner Newman

New York City Finance Commissioner Jiha

Commissioners Manion, Nero, Newman and Jiha (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 2014 Officers of the Tax Section Executive Committee

DAVID H. SCHNABEL  
Chair

DAVID R. SICULAR  
First Vice-Chair

STEPHEN B. LAND  
Second Vice-Chair

MICHAEL S. FARBER  
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 **4.5 credit hours in professional practice**. This meeting will not qualify for credit for newly admitted attorneys because it is not a basic practical skills program.



**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 Hilton New York at 1-800-445-8667 and identify yourself as a member of the New York State Bar Association. Room rates are \$179.00 for single/double occupancy. **Reservations must be made by February 10th, 2015.**



For questions about this specific program, please contact Adriana Favreau at 518-487-5630. **For registration only, please call 518-487-5522. Onsite Registration will not be available.**