

NYSBA

Tax Section Annual Meeting

TUESDAY, JANUARY 28, 2014
New York Hilton Midtown
1335 Avenue of the Americas
New York City

MORNING PANELS

9:00 A.M. and 10:30 A.M.

Rendezvous Ballroom and Trianon Ballroom, 3rd Floor

DUTCH TREAT RECEPTION

12:00 P.M.

Grand Ballroom Foyer, 3rd Floor

LUNCHEON

12:30 P.M.

Grand Ballroom, 3rd Floor

AFTERNOON PANELS

2:15 P.M.

Grand Ballroom and Trianon Ballroom, 3rd Floor

AFTERNOON STATE & LOCAL MEETING

4:00 P.M.

Lincoln Suite, 4th 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 - 10:15 a.m.

Current Issues in Partnership Tax

Rendezvous Ballroom, 3rd Floor (1.5 Professional Practice)

Panel Chair: **Joel Scharfstein**, Fried, Frank, Harris, Shriver & Jacobson LLP, New York City

Panelists: **Craig Gerson** (Invited), Attorney-Advisor, Office of Tax Legislative Counsel
Department of the Treasury, Washington, D.C.

Phillip Gall, Ernst & Young LLP, New York City

Marcy G. Geller, Simpson Thacher & Bartlett LLP, New York City

9:00 - 10:15 a.m.

FATCA Basics: What Every Tax Lawyer Should Know

Trionon Ballroom, 3rd Floor (1.5 Professional Practice)

Panel Chair: **Philip Wagman**, Clifford Chance LLP, New York City

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

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

Peter F. G. Schuur, Debevoise & Plimpton LLP, New York City

Andrew R. Walker, Milbank, Tweed, Hadley & McCloy LLP, New York City

10:30 - 12:00 p.m.

What's Hot in Corporate Tax

Rendezvous Ballroom, 3rd Floor (1.5 Professional Practice)

Panel Chair: **Gordon Warnke**, Linklaters, New York City

Panelists: **William D. Alexander** (Invited), Associate Chief Counsel (Corporate)
Internal Revenue Service, Washington, D.C.

Neil Barr, Davis Polk & Wardwell LLP, New York City

Karen Gilbreath Sowell, Ernst & Young LLP, Washington, D.C.

10:30 - 12:00 p.m.

Advanced FATCA and Recent Developments

Trionon Ballroom, 3rd Floor (1.5 Professional Practice)

Panel Chair: **Philip Wagman**, Clifford Chance LLP, New York City

Panelists: **Steven A. Musher** (Invited), Associate Chief Counsel (International)
Internal Revenue Service, Washington, D.C.

Andrew H. Braiterman, Hughes Hubbard & Reed LLP, New York City

David S. Miller, Cadwalader, Wickersham & Taft LLP, New York City

Andrew P. Solomon, Sullivan & Cromwell LLP, New York City

NEW YORK STATE BAR ASSOCIATION

Reception and Luncheon

12:00 p.m. **Dutch Treat Reception** - Grand Ballroom Foyer, 3rd Floor

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

Annual Report to the Tax Section
David H. Schnabel, Chair, Tax Section

Speaker Introduction
Diana Wollman
Former Tax Section Chair
Director, International Strategy
Internal Revenue Service

Luncheon Speaker: **Michael Danilack**
Deputy Commissioner (International) LB&I
Internal Revenue Service
Washington, D.C.

Afternoon Program

2:15 - 3:45 p.m. **What's Hot in International Tax**
Grand Ballroom, 3rd Floor (1.5 Professional Practice)

Panel Chair: **Yaron Z. Reich**, Cleary Gottlieb Steen Hamilton LLP, New York City

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

Marjorie A. Rollinson (Invited), Deputy Associate Chief Counsel
(International-Technical) Internal Revenue Service, Washington, D.C.

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

Edward E. Gonzalez, Skadden, Arps, Slate, Meagher & Flom LLP, New York City

2:15 - 3:45 p.m. **Application of NY False Claims Act to Taxes**
Trianon Ballroom, 3rd Floor (1.5 Professional Practice)

Panel Chair: **Jack Trachtenberg**, Reed Smith LLP, New York City

Panelists: **Randall Fox**, Bureau Chief, Taxpayer Protection Unit
Office of the New York Attorney General

Gregory Krakower, Senior Advisor & Counselor to the Attorney General
Office of the New York Attorney General

William J. Comiskey, Hodgson Russ LLP, New York City

Jane Wells May, McDermott Will & Emery LLP, New York City

AFTERNOON STATE & LOCAL MEETING**4:00 - 5:15 p.m.**

High Tea with the Commissioners - Lincoln Suite, 4th Floor
 New York State Tax Commissioner Mattox
 New York State Tax Appeals Tribunal President/Commissioner Nero
 New York City Tax Appeals Tribunal President/Commissioner Newman

Commissioners Mattox, Nero, and Newman (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
Current 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.

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 at least ten days prior to the program. For more details, please contact Lori Nicoll at New York State Bar Association, One Elk Street, Albany, New York 12207.



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 Lori Nicoll at 518-487-5563.



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 \$249.00 for single/double occupancy. ***Reservations must be made by December 23, 2013.*** You also can reserve your overnight room on the web at www.nysba.org/14accomm.



For questions about this specific program, please contact Lori Nicoll at 518-487-5563. **For registration questions only, please call 518-487-5621. Fax registration form to 518-463-5993.**