

# 2017 ANNUAL MEETING

## Tax Section Annual Meeting

Tuesday, January 24, 2017 | New York Hilton Midtown | NYC

**5.0 Total Credits:** Up to 5.0 Professional Practice (Non-transitional)

### Morning Panels

9:15 am and 10:45 am | Rendezvous Ballroom  
and Trianon Ballroom, 3rd Floor

### Luncheon

12:30 pm | Grand Ballroom, 3rd Floor

### Afternoon Panel

2:15 pm | Grand Ballroom, 3<sup>rd</sup> Floor

### State & Local Meeting/High Tea

4:15 pm | Gibson, 2nd Floor

### SECTION CHAIR

**Stephen B. Land**, Duval & Stachenfeld LLP

8:45 am – 9:00 am

### Business Meeting and Election of Officers

Trianon Ballroom, 3<sup>rd</sup> Floor

## MORNING PANELS

9:15 am – 10:30 am

### Hot Topics in Partnership Taxation

Trianon Ballroom, 3rd Floor (1.5 Professional Practice)

This panel will discuss recent and expected guidance on partnerships, potentially including disguised sales, guaranteed payments, nonrecourse debt, the fractions rule, and partnership audits.

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

**Glenn E. Dance**, Special Counsel, Office of Associate Chief Counsel (Pass-Throughs & Special Industries),  
Internal Revenue Service, Washington, DC

**Peter A. Furci**, Debevoise & Plimpton LLP, New York City

**James B. Sowell**, KPMG LLP, Washington, DC

**Clifford M. Warren**, Special Counsel, Office of Associate Chief Counsel (Pass-Throughs & Special Industries),  
Internal Revenue Service, Washington, DC

9:15 am – 10:30 am

### Where's (Customer) Waldo? Developments in Multistate Taxation

Rendezvous Ballroom, 3rd Floor (1.5 Professional Practice)

As states move to "market-based" sourcing, determining the location of the customer has become central to the allocation of multistate income. This panel will examine this trend from both a New York and national perspective.

*Chair:* **Arthur R. Rosen**, McDermott Will & Emery LLP, New York City

**Karin M. Ecroyd**, Director, Corporate Tax Planning, Advance Finance Group LLC, New York City

**Raymond J. Freda**, Andersen Tax LLC, New York City

**Sheldon H. Laskin**, Counsel, Multistate Tax Commission, Washington, DC

**Dennis Rimkunas**, Jones Day, New York City

10:45 am – 12:00 pm

## Corporate Taxation: Implementing *General Utilities* Repeal

Trionon Ballroom, 3rd Floor (1.5 Professional Practice)

Thirty years after the repeal of General Utilities, unfinished business remains, as illustrated by recent developments in spinoffs, “May” regulations, and REIT conversions. This panel will consider these and other new developments in corporate taxation.

*Chair:* **Lawrence M. Garrett**, Ernst & Young LLP, Washington, DC

**Lauren Angelilli**, Cravath, Swaine & Moore LLP, New York City

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

**Robert H. Wellen**, Associate Chief Counsel (Corporate), Internal Revenue Service, Washington, DC

**Brett York**, Attorney-Advisor, U.S. Department of the Treasury, Washington, DC

10:45 am – 12:00 pm

## Hot Topics in International Taxation

Rendezvous Ballroom, 3rd Floor (1.5 Professional Practice)

This panel will address recent and expected guidance in international taxation, with potential topics including foreign tax credits in “state aid” cases, investments by CFCs in U.S. property through partnerships, foreign tax credit treatment of covered asset acquisitions, foreign exchange treatment of offshore branches, transfers of intangibles, and contributions to partnerships with related foreign partners.

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

**Danielle E. Rolfes**, International Tax Counsel, U.S. Department of the Treasury, Washington, DC

**Marjorie A. Rollinson**, Associate Chief Counsel (International), Internal Revenue Service, Washington, DC

**Ansgar A. Simon**, Boies, Schiller & Flexner LLP, New York City

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

12:30 pm

## Luncheon

**Nina E. Olson**, National Taxpayer Advocate, Internal Revenue Service, Washington, DC

## AFTERNOON PANEL

2:15 pm – 4:00 pm

### Prospects for Tax Reform in 2017

Grand Ballroom, 3rd Floor (2.0 Professional Practice)

Political realignments have created opportunities for tax reform, including corporate and individual rate reduction and base broadening, territorial or destination-based international taxation, and expanded mark to market taxation of financial products. This panel will look at possible pathways to specific legislation in these areas.

*Chair:* **Eric Solomon**, Ernst & Young LLP, Washington, DC

**George A. Callas**, Senior Tax Counsel, Office of the Speaker, U.S. House of Representatives (invited)

**Mark A. Prater**, Deputy Staff Director & Majority Chief Tax Counsel, Senate Finance Committee, Washington, DC

**John Samuels**, Chairman of Global Tax, The Blackstone Group, L.P., New York City

**Alan D. Viard**, American Enterprise Institute, Washington, DC

**Philip R. Wagman**, Clifford Chance US LLP, New York City



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

**Register Online** [www.nysba.org/AM2017](http://www.nysba.org/AM2017) | **Get Social: #nysba17**

---

### IMPORTANT INFORMATION

**Under New York’s MCLE rule**, this program has been approved for up to 5.0 credit hours (Areas of Professional Practice). This program 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 this policy, any member of our Association or non-member who has a genuine basis for their hardship, if approved, can receive a discount or scholarship, depending on the circumstances. Request for discounts or scholarships must be received prior to January 13, 2017. For more details, please contact Tiffany Bardwell in writing at New York State Bar Association, One Elk Street, Albany, New York 12207 or [tbardwell@nysba.org](mailto:tbardwell@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 Tiffany Bardwell at 518-4875675.



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. Reservations must be made by Friday, December 16, 2016. You also can reserve your overnight room on the web at [www.nysba.org/am17accomm](http://www.nysba.org/am17accomm).



For questions about this specific program, please contact Tiffany Bardwell at 518-487-5675. **For registration questions only, please call the Member Resource Center at 800-582-2452. Fax registration form to 518-463-5993.**