

NEW YORK STATE BAR ASSOCIATION

ANNUAL MEETING 2018

Tax Section Annual Meeting

January 23, 2018 | New York Hilton Midtown | NYC

Up to 5.0 Total Credits: 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, 3rd Floor

State & Local Meeting/High Tea

4:15 pm | Gibson, 2nd Floor

8:45 am – 9:00 am

Business Meeting and Election of Officers

Trianon Ballroom, 3rd Floor

9:15 am – 10:30 am (Rendezvous)

Disruption and Uncertainty in Partnership Tax

This panel will discuss the possible changes to the new debt-allocation rules in the disguised sale regulations, the future of Revenue Ruling 91-32 in light of its possible codification and *Grecian Magnesite*, and the impact of various tax reform proposals on partnership tax.

Chair: **Phillip Gall**, Ernst & Young LLP, New York City

Karen Lohnes, PricewaterhouseCoopers LLP, Washington, DC

Bryan Rimmke, Attorney-Advisor, Office of Tax Policy, U.S. Department of the Treasury, Washington, DC

Michael Shulman, Shearman & Sterling LLP, New York City

Clifford Warren, Special Counsel, Office of Associate Chief Counsel, Passthroughs and Special Industries, Internal Revenue Service, Washington, DC

9:15 am – 10:30 am (Trianon)

Is Voluntary Compliance Becoming Less Voluntary? A Whistleblower Case Study and Other Tax Compliance Topics

This panel will discuss ethical issues related to the discovery, correction, and prevention of tax non-compliance, including a whistle-blower case that raises these issues, ethical considerations when handling an internal tax investigation, and advising clients on correcting past non-compliance.

Chair: **Megan L. Brackney**, Kostelanetz & Fink, LLP, New York City

Brian W. Kittle, Mayer Brown LLP, New York City

John P. Steines, New York University School of Law, New York City

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

Get Social: #NYSBA18   



10:45 am – 12:00 pm (Rendezvous)

Selected Topics in Corporate Taxation

This panel will review selected current developments and other topics relevant to corporate tax.

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

Lawrence Garrett, Ernst & Young LLP, Washington DC

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

Brett York, Attorney-Advisor, Office of Tax Legislative Counsel, U.S. Treasury, Washington DC

Sara B. Zabloutney, Kirkland & Ellis LLP, New York City

10:45 am – 12:00 pm (Trianon)

The Effects of Pending Federal Tax Legislation on State and Local Taxation

The panel will discuss the state and local tax implications of pending federal tax legislation (including the partnership audit rules), addressing principles of federal conformity, the effects of potential changes to the taxation of businesses with foreign operations, and the federal treatment of income from pass-through entities.

Chair: **Irwin M. Slomka**, Morrison & Foerster LLP, New York City

Joshua E. Gewolb, Harter Secrest & Emery LLP, Rochester

Helen Hecht, General Counsel, Multistate Tax Commission, Washington, DC

Alyse McLoughlin, McDermott Will & Emery, New York City

12:30 pm (Grand Ballroom)

Luncheon

William M. Paul, Acting Chief Counsel, Internal Revenue Service, Washington, DC

2:15 pm – 4:00 pm (Grand Ballroom)

Comprehensive Reform of the U.S. International Tax System

This panel will focus on the international aspects of the Tax Cuts and Jobs Act.

Chair: **Kathleen L. Ferrell**, Davis Polk & Wardwell LLP, New York City

Michael J. Caballero, Covington & Burling LLP, Washington, DC

Peter Connors, Orrick, Herrington & Sutcliffe LLP, New York City

Danielle Rolfes, KPMG LLP, Washington, DC

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



THE NEW YORK
BAR FOUNDATION

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

Register Online www.nysba.org/AM2018 | **Get Social: #NYSBA18**



IMPORTANT INFORMATION

Under New York's MCLE rule, this program has been approved for a total of up to 5.0 credit hours (area 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 12, 2018. 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.



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 518-487-5675.



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 or on the web at www.nysba.org/am18accomm. The rate will be based on room selection (single/double occupancy) and arrival/departure dates with additional taxes and hotel fees. The discounted rate for January 21st and January 22nd is \$179 per night. The discounted rate for January 23rd through January 28th is \$229 per night. A rate of \$209 will be offered to those with overlapping dates. Reservations must be made by December 29, 2017.



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.