NEW MEETING ROOMS!
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SECTION OF TAXATION

2015 MAY MEETING

MAY 7-9, 2015
WASHINGTON, DC • GRAND HYATT

FINAL PROGRAM

75 YEARS
TAXATION
A Section of the American Bar Association

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2015 MAY MEETING

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FUTURE MEETINGS / CLE CALENDAR

Section of Taxation CLE Calendar

DATE	PROGRAM	CONTACT INFO
May 13-14, 2015	**ERISA Litigation National Institute** Chicago, IL	ABA JCEB **www.americanbar.org/jceb** (202) 662-8670
May 15, 2015	**Long-Term Disability Benefits Advanced Seminar** Chicago, IL	ABA JCEB **www.americanbar.org/jceb** (202) 662-8670
June 10-12, 2015	**8th Annual U.S. – Latin America Tax Planning Strategies** Mandarin Oriental Hotel – Miami, FL	Tax Section **www.americanbar.org/tax** (202) 662-8670
July 8-10, 2015	**Estate Planning for the Family Business Owner** Marriott Fisherman's Wharf – San Francisco, CA	ALI CLE **www.ali-cle.org/** 800.CLE.NEWS
October 19-20, 2015	**Health and Welfare Benefit Plans National Institute** Marriott Fisherman's Wharf – San Francisco, CA	ABA JCEB **www.americanbar.org/jceb** (202) 662-8670

Section of Taxation Meeting Calendar

DATE	PROGRAM	LOCATION
September 17-19, 2015	**JOINT FALL CLE MEETING**	Sheraton Hotel & Towers – Chicago, IL
January 28-30, 2016	**MIDYEAR MEETING**	JW Marriott LA Live – Los Angeles, CA
May 5-7, 2016	**MAY MEETING**	Grand Hyatt – Washington, DC
September 29 – October 1, 2016	**JOINT FALL CLE MEETING**	Westin Boston Waterfront – Boston, MA

TAPS
Tax Assistance Public Service
ABA SECTION OF TAXATION

ABA Section of Taxation
Tax Assistance Public Service Endowment Fund

Through the newly created Tax Assistance Public Service (TAPS) endowment fund, the American Bar Association Section of Taxation will provide stable, long-term funding for its tax-related public service programs for underserved taxpayers. The initial expectation is that, once the $5 million endowment goal is reached, income from the TAPS fund will be dedicated to support the Christine A. Brunswick Public Service Fellowship program. Young tax attorneys funded by this two-year fellowship work to provide tax-related legal assistance to the underserved. When applying for these highly competitive fellowships, the applicants must secure a potential position with a nonprofit organization that will sponsor and supervise their work during the term of their fellowship.

Other programs and services that might be supported by the TAPS Endowment include:

- Low-Income Taxpayer Clinic (LITC) Assistance: The Section of Taxation publishes a manual to help LITCs understand how to effectively represent low income taxpayers, and provides scholarships to clinicians to attend Section meetings where they can obtain continuing legal education and training to take back to their clinics.
- Volunteer Income Tax Assistance (VITA): Across the nation, volunteers help prepare basic income tax returns for low-income taxpayers or those with special needs such as the elderly, non-English speaking persons, and persons with disabilities.
- Adopt-a-Base: Volunteers go through a training and certification process, and then train military personnel to prepare returns in their base's VITA program. Volunteers can also be available to provide representation to members of the military who encounter tax controversies with the IRS or state tax authorities, or to provide tax advice on issues specific to their military service.
- Calendar Calls: Volunteers provide national coverage at Tax Court calendar calls and are available to consult with unrepresented taxpayers to advise them on court procedure, assist with settlement discussions, and in some cases, to take on their representation before the court.
- Tax Assistance to Disaster Victims: The Section of Taxation has provided pro bono tax assistance to victims of disasters, including in the aftermath of the 9/11 terrorist attacks and Hurricane Katrina. The Section of Taxation helped put in place a memorandum of understanding with the IRS and FEMA to establish a network of volunteers who are able to provide pro bono tax assistance to displaced Americans in times of need.
- Education and Research: The Section of Taxation has funded numerous educational programs and studies addressing important tax policy issues, including the needs of underserved taxpayers.

What You Can Do to Help

In addition to volunteering your time, we need your financial support. Please give generously to the TAPS endowment fund. Donations of $5000 or more can be spread over up to five years. The TAPS endowment fund will accept contributions of cash or appreciated securities, and also has flexibility to accept contributions through various planned giving options.

A detachable donation form is available at the back of this program, or to donate online, go to http://ambar.org/taxtaps

Celebrate the Section of Taxation's 75th Anniversary

Your generous gift or multi-year pledge to the Section's newly created Tax Assistance Public Service (TAPS) endowment fund, created in honor of its 75th Anniversary, will ensure that we can meet the growing demand for legal representation of underserved taxpayers across the country now and in the future. Your support will be recognized to all Section members and throughout the ABA at the following levels:

Chair's Circle: $25,000 or more*

- Invitation to special Chair's reception and dinner to celebrate the TAPS endowment campaign.
- Recognition on the front interior cover of the Section's conference program books which appear online and are printed for distribution onsite for the five years following the pledge date.
- Acknowledgement on the Section's website.
- Prominent listing in the ABA Fund for Justice and Education (FJE) Annual Report circulated to 50,000 donors.
- TAPS Donor Indicia affixed to the donor's 2015 conference name badges.

Founder's Circle: $10,000 to $24,999*

- Invitation to special Chair's reception to celebrate the TAPS endowment campaign.
- Recognition on the front interior cover of the Section's conference program books which appear online and are printed for distribution onsite for the five years following the pledge date.
- Acknowledgement on the Section's website.
- Prominent listing in the ABA FJE Annual Report circulated to 50,000 donors.
- TAPS Donor Indicia affixed to the donor's 2015 conference name badges.

Member's Circle: $5,000 to $9,999*

- Acknowledgement on the Section's website.
- Prominent listing in the ABA FJE Annual Report circulated to 50,000 donors.
- TAPS Donor Indicia affixed to the donor's 2015 conference name badges.

75th Anniversary Supporters: $1,000 to $4,999**

- Acknowledgement on the Section's website.
- Prominent listing in the ABA FJE Annual Report circulated to 50,000 donors.
- TAPS Donor Indicia affixed to the donor's 2015 conference name badges.

75th Anniversary Donors: $75 to $999

- Acknowledgement in the ABA FJE Annual Report circulated to 50,000 donors.
- TAPS Donor Indicia affixed to the donor's 2015 conference name badges.

**Pledges may be funded over five years or less.*

***Pledges may be funded over three years or less.*

A detachable donation form is available at the back of this program, or to donate online, go to http://ambar.org/taxtaps

WELCOME

ARMANDO GOMEZ

SECTION CHAIR

The Section of Taxation welcomes you to the **2015 May Meeting** in Washington, DC. We are pleased that you have decided to join us and take advantage of the opportunity to participate in high-level discussions between private practitioners and government on the most important issues facing tax lawyers today.

Please note the following meeting highlights:

- **Hosted WELCOME RECEPTION** on Thursday 6:00PM – 8:00PM in Independence A, Level 5B
- **PLENARY SESSION & SECTION LUNCHEON** with Keynote Speaker William J. Wilkins, Chief Counsel, Office of Chief Counsel, IRS, Washington, DC on Saturday 12:00PM – 1:30PM in Independence A, Level 5B
- **SECTION PROGRAMS** Saturday afternoon on a broad range of hot topics

Stay connected with our **MOBILE MEETING APPLICATION**

Download the app by using your device to scan the QR code or visit **http://ambar.org/taxapps**

Use the app to view the program, create a personalized agenda, access the latest meeting materials, find speakers and fellow attendees, receive updates throughout the meeting and more!

TWITTER: JOIN THE CONVERSATION. Follow us @ABATAXSECTION and use #TAXMAY to stay connected during the meeting.

WIRELESS INTERNET is available for attendees throughout the meeting space.

We hope you enjoy the meeting and we welcome your comments.

HIGHLIGHTS

WELCOME RECEPTION *(Complimentary)*

The Tax Section is hosting a complimentary Welcome Reception for all attendees on Thursday evening, May 7, at 6:00pm in Independence A, Level 5B. Come early and meet with your colleagues and with new Section members to network and discuss current topics of the day.

SECTION RECEPTION *(Ticketed Event)*

The Section Reception will take place on Friday, May 8, 6:30pm – 8:00pm, at the National Portrait Gallery, Kogod Courtyard. Enjoy great food and drinks with your colleagues and friends.

SECTION LUNCH & PLENARY SESSION *(Ticketed Event)*

The Section Luncheon will be held on Saturday, May 8 from 12:00pm – 1:30pm in Independence A, Level 5B. Attendees must purchase a ticket to attend the luncheon.

DISTINGUISHED SERVICE AWARD

The Distinguished Service Award was established to underscore the ABA Section of Taxation's respect for and support of professionalism within the tax bar. The Distinguished Service Award Committee has selected Stefan F. Tucker as the recipient of the 2015 Distinguished Service Award for outstanding service to the profession. Former recipients of the award are Lawrence B. Gibbs (2014), Christine A. Brunswick* (2013) Phillip L. Mann (2012), N. Jerry Cohen (2011), Professor Ronald A. Pearlman (2010), Irwin Treiger* (2009), M. Carr Ferguson (2008), Loretta Collins Argrett (2007), Martin D. Ginsburg (2006), Jere D. McGaffey (2005), K. Martin Worthy (2004), M. Bernard Aidinoff (2003), James P. Holden (2002), Sherwin P. Simmons* (2001), Frederick G. Corneel* (2000), Boris Kostelanetz* (1999), Judge Theodore Tannenwald* (1998), Edwin S. Cohen* (1997), Randolph W. Thrower* (1996) and John S. Nolan* (1995).

TAX BRIDGE TO PRACTICE

Organized by the Young Lawyers Forum and Diversity, this program is designed to provide an introduction to tax practice. If you are a law student, young lawyer, new bar admittee or practitioner transitioning to tax, then this program is for you. More information is available on page pages 22-24.

* Deceased

SECTION EXHIBITORS

NEW LOCATION!!

Section Exhibitors will be open on Friday from 7:00am to 5:00pm and on Saturday from 7:00am to 2:00pm in the Grand Foyer, Level 1B. The following organizations will have exhibit booths:

Appraisal Institute

Bloomberg BNA

Practical Law

Wolters Kluwer

REGISTRATION

Registration will be available at the Grand Hyatt in Independence Foyer, Level 5B. All individuals attending any part of the **2015 May Meeting**, *including speakers*, must register and pay the registration fee. Shared registrations are not permitted. Companions are defined as non-Section members not attending substantive meetings. Any companion attending substantive programs must register and pay either the Section member or non-Section member registration fee, whichever is applicable.

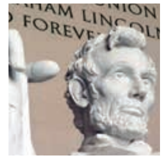
The registration fee includes exclusive access to the meeting materials website, mobile meeting application and permits registrants to attend all meetings, sessions and programs; however, it does not include meal functions and social events listed as "*Ticketed Event*." All ticketed events are sold on a first-come, first-served basis.

ON-SITE REGISTRATION AND TICKET PURCHASE HOURS

The Registration Desk, located in Independence Foyer, Level 5B, will be open during the following hours:

Thursday:	12:00pm – 7:30pm
Friday:	6:30am – 6:30pm
Saturday:	6:30am – 2:00pm

HIGHLIGHTS



BADGE IDENTIFICATION

RED Bar	Section Officers, Council Members, Committee Chairs, Task Force Chairs, Past Section Chairs
GREEN Bar	Government Officials/Guests
BLUE Bar	Young Lawyers
GRAY Bar	Law Students and LLM Candidates
ORANGE Bar	Companions
PURPLE Bar	First-time Attendees
YELLOW Badge	Press

HOSPITALITY CENTER

NEW LOCATION!!

Complimentary continental breakfast will be served in the morning. Snacks, coffee, sodas and water will be available in the afternoon.

Location: Grand Foyer, Level 1B

Time: Friday 7:00am – 4:00pm
Saturday 7:00am – 4:00pm

PROGRAM GUIDE

HOW TO USE THIS PROGRAM

The program book is divided into three primary sections: Schedule at-a-Glance, Program Schedule and Alpha Index. The following is a description of each of these sections:

SCHEDULE AT-A-GLANCE (P. 10)

Lists all programs chronologically by start time, then alphabetically by committee name. Subcommittee meetings are listed under their committee. Use this guide to find programs beginning at a specific time.

Example: To find programs starting on Friday, at 8:30am, go to the Schedule at-a-Glance section and locate the "Friday 8:30AM" programs. Here you can view the committees meeting at that time, the location, topic and the page number for the full program description in the Program Schedule.

PROGRAM SCHEDULE (P. 22)

Lists all programs chronologically by the start time, then alphabetically by committee names. Subcommittee meetings are listed under their committees. This section includes full program descriptions, speakers, locations and start and end times. The Schedule at-a-Glance and the Alpha Index will help you locate specific programs in this section.

ALPHA INDEX (P. 69)

Lists all committee programs alphabetically by committee name. Use this section to locate all programs hosted by a specific committee.

Example: To find all programs hosted by the Administrative Practice committee, go to the Alpha Index and locate 'Administrative Practice.' You will find a listing of all meetings and events hosted by the Administrative Practice committee. Go to the corresponding page number for more information.

= The Program is Recorded
★ = The Program Will Appeal to Young Lawyers or Non-specialists
= Ethics Credits has Been Requested
= No CLE Credit is Available

SCHEDULE
AT-A-GLANCE

= Taped ★ = Young Lawyers Program ⚖ = Ethics Credits Requested = No CLE Credit

COMMITTEE/PROGRAM	LOCATION	TOPIC(S)/TIME(S)	
THURSDAY 8:00AM			
Incoming Officers and Council Orientation *(Executive Session)*	Franklin Square, Level 5B	8:00AM – 9:00AM	22
THURSDAY 9:00AM			
Officers and Council Meeting *(Executive Session)*	Farragut/ Lafayette, Level 5B	9:00AM – 2:00PM	22
THURSDAY 1:00PM			
Low Income Taxpayers Representation Workshop	Independence FG, Level 5B	1:00PM – 5:00PM 1:00p – Client Intake to Filing a Tax Court Petition 2:00p – Tax Court Pre-Trial Practice 3:00p – Tax Court Trial and Appeals 4:00p – Handling a Section 6015 Case	22
Tax Bridge to Practice ★	Constitution B, Level 3B	1:00PM – 5:00PM 1:00p – Nuts & Bolts: Introduction to Life Insurance Company & Contracts Taxation 2:00p – Nuts and Bolts: Federal Estate, Gift and Generation-Skipping Transfer Tax 3:00p – Tax Tales: The Seminal Cases of Subchapter C 4:00p – On the Road Toward Diversity and Inclusion: Leading to Opportunities for All	23
THURSDAY 4:30PM			
Philanthropy Professors Meeting	Franklin, Level 5B	4:30PM – 6:00PM	24
THURSDAY 5:00PM			
Foreign Activities of US Taxpayers ★	Farragut/ Lafayette, Level 5B	5:00PM – 6:00PM 5:00p – Young Lawyers Panel	24
The Laurence Neal Woodworth Memorial Lecture	Constitution A, Level 3B	5:00PM – 7:00PM	24
THURSDAY 6:00PM			
State & Local Taxes Executive Committee Business Dinner Meeting *(By Invitation Only)*	Perkins Coie LLP	6:00PM – 9:00PM	24
Welcome Reception ★ *(Complimentary)*	Independence A, Level 5B	6:00PM – 8:00PM	24
THURSDAY 6:30PM			
Partnerships & LLCs and Real Estate Committees Dinner *(Reservation Required)*	Clyde's of Gallery Place	6:30PM – 9:30PM	24

SCHEDULE AT-A-GLANCE

COMMITTEE/PROGRAM	LOCATION	TOPIC(S)/TIME(S)	
THURSDAY 8:00PM			
First Time Attendees Dinner	Independence HI, Level 5B	8:00PM – 9:30PM	
FRIDAY 7:30AM			
ACTC Board of Regents Meeting *(Executive Session)*	Banneker, Level 1B	7:30AM – 9:00AM	25
Exempt Organizations Subcommittee on Health-Care Organizations	Latrobe, Level 3B	7:30AM – 8:30AM Roundtable Discussion of Current Developments	25
Exempt Organizations Subcommittee on Political & Lobbying Organizations	Arlington, Level 3B	7:30AM – 8:30AM Roundtable Discussion of Current Developments	25
Exempt Organizations Subcommittee on Private Foundations, Unrelated Business Income, and International Philanthropy	Cabin John, Level 3B	7:30AM – 8:30AM Roundtable Discussion of Current Developments	25
Exempt Organizations Subcommittee on Religious Organizations	Burnham, Level 3B	7:30AM – 8:30AM Roundtable Discussion of Current Developments	25
Tax Analysts Breakfast Forum With Lee Sheppard	Penn Quarter A, Level 1B	7:30AM – 8:30AM Sponsored by: Tax Analysts	25
FRIDAY 8:00AM			
Administrative Practice	Constituition A, Level 3B	8:00AM – 11:00AM 8:00a – Important Developments 8:40a – Memories Fade But Emails are Forever: New Electronic Discovery Rules in US Tax Court 10:00a – What New in IRS Exam and Appeals	26
Affiliated & Related Corporations	Independence FGH, Level 5B	8:00AM – 10:45AM 8:00a – Current Developments 9:30a – More "Known Unknowns" – How do Members of Consolidated Groups Recover "Previously Taxed Income?"	26
Banking & Savings Institutions and Investment Management Joint Panel	Franklin/ McPherson, Level 5B	8:00AM – 9:00AM 8:00a – The Tax Hedging Rules Revisited	27
Capital Recovery & Leasing	Roosevelt/ Wilson, Level 3B	8:00AM – 10:00AM 8:00a – Current Developments Report and Update on Pending Guidance 8:30a – Tangible Property Regulations and the Real Estate Industry 9:15a – Tangible Property Regulations Update – Continuation from the September Meeting – Industry Issues/Guidance, FAQs, and Related Discussions	27

SCHEDULE
AT-A-GLANCE

COMMITTEE/PROGRAM	LOCATION	TOPIC(S)/TIME(S)	
FRIDAY 8:00AM *(Continued)*			
Companions Breakfast *(Complimentary)*	Tiber Creek, Level 1B	8:00AM – 9:00AM	28
Employee Benefits Subcommittee on Defined Contribution Plans	Farragut Square, Level 5B	8:00AM – 9:30AM Defined Contribution Plans Update	28
Employee Benefits Subcommittees on Executive Compensation and Fringe Benefits and Securities Law	Declaration, Level 1B	8:00AM – 9:30AM Executive Compensation, Fringe Benefits and Securities Law Update	28
Estate & Gift Taxes	Independence DE, Level 5B	8:00AM – 10:45AM 8:00a – Current Developments 8:45a – Structuring Charitable Gifts: Blending Philanthropic Objectives with Tax Planning 9:45a – Top Ten Revenue Rulings for Estate Planners	29
Partnerships & LLCs	Constitution CDE, Level 3B	8:00AM – 10:45AM 8:00a – Partnership Compliance Issues 9:15a – Hot Topics in Partnership Taxation 10:00a – May Company Regulations	29
FRIDAY 8:30AM			
Foreign Activities of US Taxpayers	Independence A, Level 5B	8:30AM – 10:30AM 8:30a – The Intersection of Partnerships & Subpart F 9:30a – Alternative Proposals for International Tax Reform	30
Individual and Family Taxation	Independence BC, Level 5B	8:30AM – 11:30AM 8:30a – Recent Developments in the Tax-Related Identity Theft 10:00a – Affordable Care Act Implementation Issues Impacting Individuals and Families	30
Tax Policy & Simplification	Bulfinch/ Renwick, Level 3B	8:30AM – 10:30AM 8:30a – US International Tax Reform: Does It Interact with the OECD Base Erosion and Profit Shifting (BEPS) Project? If So How? 9:30a – Tax and Spending Policy in the Long Run	31

SCHEDULE AT-A-GLANCE

COMMITTEE/PROGRAM	LOCATION	TOPIC(S)/TIME(S)	
FRIDAY 8:45AM			
Exempt Organizations	Constitution B, Level 3B	8:45AM – 4:30PM 8:45a – Committee Business 9:00a – News from the IRS and Treasury 10:00a – News from the Hill 11:15a – The EO Practitioner's Perspective: Addressing Common Exempt Organizations Issues that Lack Up-to-Date Guidance 12:30p – Exempt Organizations Committee Luncheon *Speaker:* Sunita Lough, Commissioner, Tax Exempt and Government Entities Division, IRS, Washington, DC 2:00p – Energy Crisis? Climate Change? The Future of Exempt Organizations Focused on Energy and the Environment 3:00p – Volunteers in Exempt Organizations 4:00p – Cash Bar	32
FRIDAY 9:00AM			
Banking & Savings Institutions	Lafayette Park, Level 5B	9:00AM – 10:45AM 9:00a – Recent Developments on Modifications of Non-Debt Financial Instruments 10:00a – Section 871(m) Final Regulations	33
Companion Activity *(Ticketed Event)*	Capitol Building and Library of Congress	9:00AM – 3:00PM The Capitol Experience: Private Tour of the Capitol and Library of Congress. The bus will depart promptly at 9:00am from the Grand Hyatt's 10th Street entrance. The bus will return guests to the hotel after lunch.	33
Investment Management	Franklin/ McPherson, Level 5B	9:00AM – 10:45AM 9:00a – Current Regulated Investment Company Issues 10:00a – Tax Planning for Non-US Investors in Debt Funds	33
FRIDAY 9:30AM			
Employee Benefits Subcommittee on Self-Correction, Determination Letters and Other Administrative Practices	Farragut Square, Level 5B	9:30AM – 11:00AM Administrative Practices Update	34
Employee Benefits Subcommittees on Litigation, ESOPs and Fiduciary Responsibility and Plan Investments	Arlington/Cabin John, Level 3B	9:30AM – 10:30AM Employee Benefits Litigation Update	34
Employee Benefits Subcommittee on Mergers & Acquisitions	Declaration, Level 1B	9:30AM – 10:45AM Employee Benefits Mergers & Acquisitions Update	35
FRIDAY 10:00AM			
Appointments to the Tax Court *(Executive Session)*	Latrobe, Level 3B	10:00AM – 11:00AM	35

COMMITTEE/PROGRAM	LOCATION	TOPIC(S)/TIME(S)	
Employee Benefits Subcommittee on Welfare Plan and EEOC, FMLA and Leaves Issues	Burnham, Level 3B	10:00AM – 12:00PM Employee Benefits Welfare Plan and EEOC Issues Update	35
FRIDAY 10:30AM			
Transfer Pricing	Independence A, Level 5B	10:30AM – 12:30PM 10:30a – How Will IRS's Transfer Pricing Operations Move Forward in the BEPS Environment? 11:30a – Advance Pricing and Mutual Agreement (APMA) – Hot Topics	36
FRIDAY 11:00AM			
Employee Benefits Subcommittees on Distributions and Defined Benefit Plans	Roosevelt/ Wilson, Level 3B	11:00AM – 1:15PM 11:00a – PBGC Fireside Chat 11:30a – Employee Benefits Distributions and Defined Benefit Plans Updates	36
Employee Benefits Subcommittee on Subcommittee on Exempt Organization and Governmental Plans	Declaration, Level 1B	11:00AM – 12:00PM Employee Benefits Exempt Organization and Governmental Plans Update	37
Employee Benefits Subcommittee on Fiduciary Responsibility	Farragut Square, Level 5B	11:00AM – 12:00PM Employee Benefits Fiduciary Responsibilities Update	37
Employee Benefits Subcommittee on Employee Benefits Legislation	Penn Quarter A, Level 1B	11:00AM – 12:00PM Employee Benefits Legislative Update	38
Employee Benefits New Employee Benefits Attorneys Forum	Latrobe, Level 3B	11:00AM – 11:30AM Employee Benefits New Employee Benefits Attorneys Forum	38
Energy & Environmental Taxes	Lafayette Park, Level 5B	11:00AM – 12:30PM 11:00p – Energy Taxes Hot Topics Update	38
Membership & Marketing	Washington Boardroom, Level 3B	11:00AM – 12:00PM	39
S Corporations	Tiber Creek, Level 1B	11:00AM – 1:45PM 11:00a – Important Developments 11:45a – Hot Topics Relating to S Corporations 12:45p – Section 1374(d)(7) Recognition Period	39
Standards of Tax Practice	Constitution CDE, Level 3B	11:00AM – 1:45PM 11:00a – Ethical Issues in Federal Tax Practice – The Government Perspective 12:05p – Initiating a New Client Engagement: What Kinds of Ethical and Practice Standards Questions Arise for a New Client Representation?	39
FRIDAY 11:30AM			
Court Procedure & Practice Roundtable	Independence DE, Level 5B	11:30AM – 12:30PM 11:30a – First Time Tax Litigation	40

COMMITTEE/PROGRAM	LOCATION	TOPIC(S)/TIME(S)	
FRIDAY 12:00PM			
Corporate Tax and Affiliated & Related Corporations Committees Luncheon CLE *(Ticketed Event)*	Constitution A, Level 3B	12:00PM – 1:30PM	40
Diversity CLE *(Ticketed Event)*	Arlington/Cabin John, Level 3B	12:00PM – 12:30PM	40
Employee Benefits Subcommittee on ESOPs	Latrobe, Level 3B	12:00PM – 1:00PM Employee Benefits ESOP Update	41
Employee Benefits Subcommittee on Multinational Employee Benefits & Compensation Issues	Penn Quarter A, Level 1B	12:00PM – 1:15PM Employee Benefits Multinational Employee Benefits & Compensation Issues	42
Employee Benefits Subcommittee on Multiple Employers, PEOs and Controlled and Affiliated Service Groups	Burnham, Level 3B	12:00PM – 1:15PM Employee Benefits Multiple Employers, PEOs and Controlled Groups Update	42
Estate & Gift Taxes and Fiduciary Income Tax CLE *(Ticketed Event)*	McPherson Square, Level 5B	12:00PM – 1:30PM Fundamentals of Charitable Contribution Deductions	40
Partnerships & LLCs and Real Estate Luncheon CLE *(Ticketed Event)*	Arnold & Porter LLP	12:00PM – 1:00PM *Speaker:* The Honorable Cary Douglas Pugh, Judge, United States Tax Court, Washington, DC	41
State & Local Taxes Luncheon CLE *(Ticketed Event)*	Banneker, Level 1B	12:00PM – 12:30PM	41
FRIDAY 12:30PM			
Administrative Practice and Court Procedure & Practice Luncheon CLE *(Ticketed Event)*	Independence FGHI, Level 5B	12:30PM – 1:30PM Sponsored by: Caplin & Drysdale, Kostelanetz & Fink, LLP, McDermott Will & Emery, Miller & Chevalier Chartered, Thompson & Knight LLP, Thompson Hine LLP and KPMG LLP	41
Exempt Organizations Luncheon CLE (Ticketed Event)	Constituition B, Level 3B	12:30PM – 1:30PM *Speaker:* Sunita Lough, Commissioner, Tax Exempt and Government Entities Division, IRS, Washington, DC Sponsored by: Glenmede	41
Foreign Activities of US Taxpayers, Transfer Pricing and US Activities of Foreigners & Tax Treaties Luncheon CLE *(Ticketed Event)*	Independence A, Level 5B	12:30PM – 1:30PM	41
Diversity CLE	Arlington/Cabin John, Level 3B	12:30PM – 1:30PM 12:30p – Everyone, Lean In: Changing the Organizational Culture to Embrace Balance and Diversity CLE	42

SCHEDULE
AT-A-GLANCE

COMMITTEE/PROGRAM	LOCATION	TOPIC(S)/TIME(S)	
FRIDAY 12:30PM *(Continued)*			
State & Local Taxes	Banneker, Level 1B	12:30PM – 1:30PM 12:30p – Caught in the Net – Social Networking for Judges and Lawyers from the Perspective of a Local Tax Judge	43
FRIDAY 12:45PM			
Tax Compliance (Formerly Tax Shelters)	Bulfinch/ Renwich, Level 4B	12:45PM – 2:15PM	43
FRIDAY 1:15PM			
Employee Benefits	Roosevelt/ Wilson, Level 3B	1:15PM – 2:00PM 1:15p – Department of Labor Fireside Chat	43
FRIDAY 1:30PM			
Employment Taxes	Penn Quarter B, Level 1B	1:30PM – 5:30PM 1:30p – Federal Employment Tax Update 2:30p – Recent Tax Court Jurisdictional Opinions for Worker Classification Issues 3:30p – The Certified Professional Employer Organization and Enactment of Section 3511: What does it means for Third Party Payroll Providers 4:30p – IRS Employment Tax Refund Procedures	44
Section CLE Committee	Latrobe, Level 3B	1:30PM – 2:30PM	45
US Activities of Foreigners & Tax Treaties	Independence A, Level 5B	1:30PM – 3:30PM 1:30p – Impact of Owners, Directors, and Service Providers in the United States	45
FRIDAY 1:45PM			
Banking & Savings Institutions, Financial Transactions, Insurance Companies, Investment Management and Tax Exempt Financing Luncheon *(Ticketed Event)*	Declaration A, Level 1B	1:45PM – 2:45PM	41
Civil & Criminal Tax Penalties Luncheon *(Ticketed Event)*	The Hamilton	1:45PM – 2:45PM Sponsored by: Hochman, Salkin, Rettig, Toscher & Perez, P.C., Kostelanetz & Fink, LLP, Greenberg Traurig, LLP and O'Connor Davies, LLP	41
FRIDAY 2:00PM			
Bankruptcy and Workouts	Franklin Square, Level 5B	2:00PM – 5:00PM 2:00p – Debt Modifications Revisited 3:00p – Hot Topics in COD Income 4:00p – Mediation in Collection Matters – A Brave New World	45

COMMITTEE/PROGRAM	LOCATION	TOPIC(S)/TIME(S)	
FRIDAY 2:00PM *(Continued)*			
Employee Benefits	Constitution CDE, Level 3B	2:00PM – 6:00PM 2:00p – Department of Labor Employee Benefits Security Administration & Pension Benefit Guaranty Corporation Updates 3:00p – Department of Treasury / IRS Hot Topics 4:00p – Department of Treasury / IRS Questions and Answers 5:00p – Treasury / IRS Fireside Chat 6:00p – Corporate Counsel Corner 6:00p – Networking Reception	46
State & Local Taxes	Declaration B, Level 1B	2:00PM – 5:00PM 2:00p – 'Just Add SaLT!' When and How to Consider State Tax Ethical Issues in Advising Clients 3:00p – The State of State Tax Courts 4:00p – Hot Topics in the State Taxation of International Operations	47
Tax Exempt Financing	Farragut Square, Level 5B	2:00PM – 5:00PM 2:00p – Legislative, Treasury and Internal Revenue Service Update 3:15p – Political Subdivision Comment Project 3:40p – Transportation Bonds, Private Business Use and Comment Project 4:10p – Economic Development Financings and Private Lending	48
FRIDAY 2:30PM			
Court Procedure & Practice	Constitution A, Level 3B	2:30PM – 5:30PM 2:30p – Important Developments 3:10p – A Look Inside an IRS Criminal Investigation: The Journey from CI Referral to Indictment - How Did We Get Here 3:55p – Transfer Pricing, International Enforcement Issues, and Other Offshore Related Hot Topics 4:45p – Cross Border Privileges Issues	48
Law Student Tax Challenge Planning Meeting	Potomac, Level 3B	2:30PM – 3:30PM	49
FRIDAY 3:00PM			
Closely Held Businesses	Independence I, Level 5B	3:00PM – 5:45PM 3:00p – Buy-Sell Agreements for Closely Held Businesses 4:15p – Defending Clients From the Trust Fund Recovery Penalty	50
Diversity	Arlington/Cabin John, Level 3B	3:00PM – 5:00PM 3:00p – Working with Your Client: Perspectives from In-House Counsel 4:00p – Ensuring Ethical Client Solicitations	50

SCHEDULE
AT-A-GLANCE

COMMITTEE/PROGRAM	LOCATION	TOPIC(S)/TIME(S)	
FRIDAY 3:00PM *(Continued)*			
Financial Transactions	Independence FG, Level 5B	3:00PM – 5:45PM 3:00p – Five Households, All Alike in Dignity: Resolving Differing Views of Tax Law within the IRS Office of Chief Counsel 4:00p – Related Party Financing: Current Law and Policy Considerations 5:00p – Current Developments and Issues	51
Insurance Companies	Lafayette Park, Level 5B	3:00PM – 5:45PM 3:00p – Health Insurance Update 3:55p – Legislative Update 4:55p – Captive Insurance Update	52
Real Estate	Independence BCDE, Level 5B	3:00PM – 5:45PM 3:00p – Legislative Update 3:55p – FIRPTA, Section 892 & REITs 4:50p – Motivating the Real Estate Deal and Fund Team	52
Sponsorships	Washington Boardroom, Level 3B	3:00PM – 4:00PM	53
Tax Accounting	Tiber Creek, Level 1B	3:00PM – 5:45PM 3:00p – Section 199 – Recent Developments and Hot Topics 3:45p – Accounting Methods Considerations for Partnerships 4:25p – Current Developments 5:00p – Tangible Property Regulations Guidance Update	53
Teaching Taxation	Roosevelt/ Wilson, Level 3B	3:00PM – 4:30PM 3:00p – Changing the Conversation About Tax Reform: Dynamic Scoring	54
FRIDAY 3:30PM			
Joint Session of Foreign Activities of US Taxpayers, Transfer Pricing and US Activities of Foreigners & Tax Treaties	Independence A, Level 5B	3:30PM – 5:30PM 3:30p – Joint Current International Developments Panel	54
FRIDAY 4:00PM			
Publications *(Executive Session)*	Latrobe, Level 3B	4:00PM – 5:00PM	55
Young Lawyers Forum ★	Penn Quarter A, Level 1B	4:00PM – 5:30PM 4:00p – Hot Topics in International Tax ★	55
FRIDAY 4:30PM			
Companion Event Committee	Potomac, Level 3B	4:30PM – 5:00PM	55

COMMITTEE/PROGRAM	LOCATION	TOPIC(S)/TIME(S)	
FRIDAY 5:30PM			
Diversity & Young Lawyers Forum Networking Reception ★	Grand Foyer, Level 1B	5:30PM – 6:30PM	55
FRIDAY 5:45PM			
Foreign Activities of US Taxpayers Business Meeting *(Executive Session)*	Washington Boardroom, Level 3B	5:45PM – 6:30PM	55
Foreign Lawyers Forum Business Meeting *(Executive Session)*	Roosevelt/ Wilson, Level 3B	5:45PM – 6:30PM	55
Transfer Pricing Business Meeting *(Executive Session)*	Bulfinch/ Renwich, Level 4B	5:45PM – 6:30PM	55
US Activities of Foreigners & Tax Treaties Business Meeting *(Executive Session)*	Latrobe, Level 3B	5:45PM – 6:30PM	55
FRIDAY 6:30PM			
Section Reception ★ *(Ticketed Event)*	National Portrait Gallery, Kogod Courtyard	6:30PM – 8:00PM	55
FRIDAY 8:00PM			
Joint International Committees Dinner *(Reservations Required)*		8:00PM – 10:00PM	55
SATURDAY 7:00AM			
Tax Practice Management	Declaration, Level 1B	7:00AM – 8:30AM 7:00a – Managing your Malpractice Risk: Ways to Reduce your Claims and Costs	56
SATURDAY 7:15AM			
Partnerships & LLCs/Real Estate/ S Corporations "Shop Talking" Breakfast *(Ticketed Event)*	Constitution B, Level 3B	7:15AM – 8:30AM	56
SATURDAY 7:30AM			
Incoming Committee Chairs, Vice-Chairs, Officers & Council Breakfast *(Executive Session)*	Independence A, Level 5B	7:30AM – 8:30AM	56
SATURDAY 7:45AM			
Court Procedure and Practice Officers and Subcommittee Chairs Breakfast *(Ticketed Event)*	Burnham, Level 3B	7:45AM – 9:15AM	56

SCHEDULE

AT-A-GLANCE

COMMITTEE/PROGRAM	LOCATION	TOPIC(S)/TIME(S)	
SATURDAY 8:30AM			
Employee Benefits	Constitution A, Level 3B	8:30AM – 11:30AM 8:30a – Affordable Care Act After 5 Years 9:30a – Qualified Plan Testing in Controlled Group and Affiliated Service Group Environments 10:30a – Fiduciary Issues and Data Privacy	56
Fiduciary Income Tax	Bulfinch/ Renwick, Level 3B	8:30AM – 11:30AM 8:30a – Current Developments 9:15a – State Fiduciary Law Update 9:40a – Including Capital Gains in DNI 10:35a – Charitable Contribution Deductions for Estates and Trusts under Section 642(c): Timing, Traps and Techniques	57
LLCs and LLPs Subcommittee of Partnerships & LLCs	Arlington/Cabin John, Level 3B	8:30AM – 10:30AM 8:30a – Partnership Divisions: Opportunity or Nightmare 9:30a – Dual Status Issue	58
Pro Bono & Tax Clinics	Farragut/ Lafayette, Level 5B	8:30AM – 11:30AM 8:30a – Update from Tax Court 9:00a – Handling Cases With Potential Criminal Issues 10:00a – W-2 and Worker Classification Issues 11:00a – Hot Topics	58
Sales, Exchanges & Basis ★	Independence FG, Level 5B	8:30AM – 11:30AM 8:30a – Current Developments in Sales, Exchanges & Basis ★ 9:00a – The Long and the Short of the Effects of *Long* on Long Term Capital Gains 10:00a – Taxation of Fees for Distribution Rights and Franchises 10:45a – A Critical Look at “Deferred Sales Trusts”	59
State & Local Taxes Practitioners Roundtable *(Executive Session)*	Roosevelt/ Wilson, Level 3B	8:30AM – 10:30AM	60
SATURDAY 8:45AM			
Civil & Criminal Tax Penalties	Constitution CDE, Level 3B	8:45AM – 11:45AM 8:45a – Reports of Subcommittees on Important Developments 9:20a – Internal Revenue Service, Criminal Investigation – Update 9:45a – Department of Justice, Tax Division – Update 10:10a – Day of Reckoning – An Update on Offshore Appeals 10:55a – Money Laundering – IRS Seizure and Forfeiture Post October 25, 2014	60
Corporate Tax	Independence BCD, Level 5B	8:45AM – 11:45AM 8:45a – Current Developments 9:15a – It's All About the Basis 10:30a – Not Free From Doubt? – Corporate Tax Opinions	61

COMMITTEE/PROGRAM	LOCATION	TOPIC(S)/TIME(S)	
SATURDAY 9:00AM			
Foreign Lawyers Forum	Independence HI, Level 5B	9:00AM – 11:30AM 9:00a – General Anti-Abuse Rules (GAAR) Rapidly Gaining Territory in Double Tax Treaties 10:15a – Lux Tax Leaks Become EU Tax Leaks: 2016 Automatic Exchange of Tax Rulings in the EU	61
SATURDAY 10:00AM			
Employment Taxes & Exempt Organizations Joint Panel	Constitution B, Level 3B	10:00AM – 11:00AM 10:00a – Exempt Organizations, Employment Taxes and Information Reporting	62
SATURDAY 10:30AM			
State & Local Taxes: Publication Subcommittees	Roosevelt/ Wilson, Level 3B	10:30AM – 11:00AM	62
SATURDAY 11:00AM			
State and Local Taxes Vice-Chairs' Planning Meeting *(Executive Session)*	Roosevelt/ Wilson, Level 3B	11:00AM – 12:00PM	62
SATURDAY 12:00PM			
Section Luncheon & Plenary Session *(Ticketed Event)*	Independence A, Level 5B	12:00PM – 1:30PM	63
SATURDAY 2:00PM			
Section Program Presented by Administrative Practice, Civil and Criminal Tax Penalties, and Court Procedure and Practice	Declaration, Level 1B	2:00PM – 4:00PM Choosing Wisely: When to Use (or Not Use) Mediation to Obtain Cost-Effective Closure in Exam & Collection Cases	64
Section Program Presented by CLE Committee	Banneker, Level 1B	2:00PM – 3:00PM HUF HUF and Blow the IRS Away: An analysis of a Hindu Undivided Family ("HUF") - Is it an entity or a trust? Neither? A Tenancies in Common? How does it comply with US Tax Laws	64

PROGRAM SCHEDULE
THURSDAY, MAY 7

8:00AM – 9:00AM Franklin Square, Level 5B
Incoming Officers & Council Orientation CLE *(Executive Session)*

9:00AM – 2:00PM Farragut/Lafayette, Level 5B
Officers & Council Meeting CLE *(Executive Session)*

1:00PM – 5:00PM Independence FG, Level 5B
Low Income Taxpayers Representation Workshop *(Registration Required)*

The Pro Bono & Tax Clinics Committee proudly presents the annual workshop for new and pro bono practitioners.

1:00pm **Client Intake to Filing a Tax Court Petition.** This panel will cover issues from the initial client intake process through the filing of a petition in the Tax Court. Areas addressed will include proper vetting of potential clients, the information gathering process and resolving disputes administratively, and tips on drafting and filing the petition and related attachments.

Panelists: Professor Robert G. Nassau, Syracuse University College of Law, Syracuse, NY; Jane Zhao, McDermott Will & Emery LLP, Chicago, IL; Jamie Andree, Indiana Legal Services, Inc., Bloomington, IN

2:00pm **Tax Court Pre-Trial Practice.** This panel will illustrate how to navigate a Tax Court case after the petition is filed but before trial. Areas addressed will include strategies for settlement (with IRS counsel and Appeals), discovery, stipulations of fact, motions, and submitting cases fully stipulated under Rule 122.

Moderator: Kevin Spencer, McDermott Will & Emery LLP, Washington, DC

Panelists: The Honorable Lewis R. Carluzzo, Special Trial Judge, US Tax Court, Washington, DC; Professor Keith Fogg, Villanova Law School, Villanova, PA; Debra K. Moe, Deputy Division Counsel (Small Business / Self-Employed Division), IRS, Washington, DC

3:00pm **Tax Court Trial and Appeals.** This panel will discuss trying a case in the Tax Court. Topics covered will include filing the pre-trial memorandum, preparing and using witnesses at trial, submitting documents into evidence, brief writing, Rule 155 computations, and whether and how to appeal a Tax Court decision. The panel will also discuss trying a case picked up at the Calendar Call.

Moderator: Susanna Ratner, SeniorLAW Center, Philadelphia, PA

Panelists: The Honorable Peter J. Panuthos, Chief Special Trial Judge, US Tax Court, Washington, DC; Timothy Jacobs, Hunton & Williams, Washington, DC; Richard G. Goldman, Acting Deputy Associate Chief Counsel (Procedure & Administration), IRS, Washington, DC

4:00pm **Handling a Section 6015 Case.** This panel will discuss issues relating to litigating a case under section 6015. Topics covered will include intervenors, privacy concerns, and demonstrating that relief should be granted.

Moderator: Susan Morgenstern, Local Taxpayer Advocate, Cleveland, OH

Panelists: The Honorable Joseph R. Goeke, Judge, US Tax Court, Washington, DC; Andrew R. Roberson, McDermott Will & Emery LLP, Chicago, IL; Charles A. Hall, Special Counsel (Procedure and Administration), IRS, Washington, DC

1:00PM – 5:00PM Constitution B, Level 3B

Tax Bridge to Practice ★ *(Registration Required)*

Sponsored by: Young Lawyers Forum and Diversity.

1:00pm **Nuts & Bolts: Introduction to Life Insurance Company & Contracts Taxation.** Ideal for new practitioners, the panel will provide an introduction to the taxation of life insurance companies and their contracts, including life insurance contracts and annuities. Panelists will discuss why life insurance companies receive unique treatment under the Internal Revenue Code and explain key concepts and terms so that new practitioners will be able to handle assignments in this area with confidence.

Moderator: Graham R. Green, Sutherland Asbill & Brennan LLP, Washington, DC

Panelists: Alexis MacIvor, Chief, Office of Associate Chief Counsel (Financial Institutions & Products), IRS, Washington, DC; Alison R. Peak, Davis & Harman LLP, Washington, DC; Mandana Parsazad, American Council of Life Insurers, Washington, DC

Co-Sponsored by: Insurance Companies

2:00pm **Nuts and Bolts: Federal Estate, Gift and Generation-Skipping Transfer Tax.** This program will give a brief overview of the Federal estate, gift, and the generation-skipping transfer tax concepts. The panelists will give practice tips on basic planning techniques, including trusts for spouses and children. The presentation will also include common issues facing same-sex couples and transfers to non-citizens.

Moderator: Jane Zhao, McDermott Will & Emery, Chicago, IL

Panelists: Hannah Mensch, Ehrenkranz & Ehrenkranz LLP, New York, NY; Christopher G. Murrer, Venable LLP, Washington, DC

Co-Sponsored by: Estate & Gift Taxes

3:00pm **Tax Tales: The Seminal Cases of Subchapter C.** Boris Bittker and James Eustice once wrote, "...a corporation is like a lobster pot: easy to enter, difficult to live in, and painful to get out of." From poor Mrs. Kass to the mighty General Utilities Company, each taxpayer has a grand story of struggle in the corporate form. This panel will breathe life into some essential corporate tax cases with the goal of emphasizing the unique narratives of the taxpayers involved and how each earned a place in the glorious pantheon of tax law.

Moderator: Michelle Lo, Linklaters, New York, NY

Panelists: Gary Scanlon, EY, Chicago, IL; Rose E. Jenkins, Attorney, Branch 2, Office of Associate Chief Counsel (International), IRS, Washington, DC; Alfred Bae, KPMG, Houston, TX

Co-Sponsored by: Corporate Tax

THURSDAY, MAY 7

4:00pm **On the Road Toward Diversity and Inclusion: Leading to Opportunities for All.** *(Elimination of Bias)* Join the Financial Transactions Committee for an engaging conversation regarding the progress made and work remaining to adhere to the ABA's commitment to promote diversity in the legal profession. More and more businesses view diversity as a priority, not only in their own companies, but also in their relationships with service providers. The panelists will share views on how mentorship and opportunity fosters diversity of professionals and results in teams that deliver the highest level of client service. Drawing on their varied experiences, the panelists will offer suggestions for creating a culture of inclusivity that can lead to enhanced productivity and long-standing business relationships.

Moderator: Lena Y. Hines, PwC, Washington, DC

Panelists: Frank J. Jackson, DLA Piper, New York, NY; Pamela F. Olson, PwC, Washington, DC; Richard G. Larkins, EY, Washington, DC; Kristen Garry, Shearman & Sterling LLP, Washington, DC

Co-Sponsored by: Financial Transactions

4:30PM – 6:00PM Franklin, Level 5B

Philanthropy Professors Meeting

5:00PM – 6:00PM Farragut/Lafayette, Level 5B

Foreign Activities of US Taxpayers ★

Chair: Joseph Calianno, Grant Thornton LLP, Washington, DC

5:00pm **Young Lawyers Panel.** The panel will cover inbound and outbound international tax topics that are complementary to, and provide relevant background regarding, the other USAFTT and FAUST panels at the conference. The panel is targeted towards younger practitioners with an interest or background in international tax.

Panelists: Cheryl C. Magat, Toronto, ON; Janine Burman-Gage, EY, New York, NY; Clayton H. Collins, PwC, Washington, DC; John D. Bates, BakerHostetler, Washington, DC

5:00PM – 7:00PM Constitution A, Level 3B

The Laurence Neal Woodworth Memorial Lecture and Reception

Sponsored by: Ohio Northern University, Pettit School of Law

6:00PM – 9:00PM Perkins Coie LLP

State & Local Taxes Executive Committee Business Dinner Meeting *(Invitation Only)*

Meeting of Committee Officers & Subcommittee Chairs and invited guests

Chair: Gregg D. Barton, Perkins Coie LLP, Seattle, WA

6:00PM – 8:00PM Independence A, Level 5B

Welcome Reception ★ *(Complimentary)*

6:30PM – 9:30PM Clyde's of Gallery Place

Partnerships & LLCs and Real Estate Committees Dinner *(Reservation Required)*

Members of the Real Estate Committee and the Partnerships & LLCs Committee will meet at Clyde's of Gallery Place, 707 7th Street, NW, Washington, DC. Cocktails (cash bar) will begin at 6:30 pm, food passed and served at stations starting at 7:00 pm. .

8:00PM – 9:30PM Independence HI, Level 5B

First Time Attendees Dinner ★

PROGRAM SCHEDULE
FRIDAY, MAY 8

7:30AM – 9:00AM Banneker, Level 1B
ACTC Board of Regents Meeting *(Executive Session)*

7:00AM – 4:00PM Grand Foyer, Level 1B
Hospitality Center *(Complimentary)*
Continental breakfast will be served in the morning. Snacks, coffee, sodas and water will be available in the afternoon.

7:30AM – 8:30AM Latrobe, Level 3B
Exempt Organizations Subcommittee on Health-Care Organizations
Chairs: T.J. Sullivan, Drinker Biddle & Reath LLP, Washington, DC; Robert W. Friz, PwC, Philadelphia, PA

7:30am **Roundtable Discussion of Current Developments**

7:30AM – 8:30AM Arlington, Level 3B
Exempt Organizations Subcommittee on Political and Lobbying Organizations
Chairs: Rosemary E. Fei, Adler & Colvin, San Francisco, CA; Elizabeth J. Kingsley, Harmon Curran Spielberg + Eisenberg LLP, Washington, DC

7:30am **Roundtable Discussion of Current Developments**
Guest Speaker: Ellen Aprill, Loyola Law School, will discuss her recent article, "The Latest Installment of the Section 501(c)(4) Saga: The Section 527 Obstacle to Effective Section 501(c)(4) Regulations," followed by current developments discussion, including implications of recent Van Hollen case for exempt organizations.

7:30AM – 8:30AM Cabin John, Level 3B
Exempt Organizations Subcommittee on Private Foundations, Unrelated Business Income and International Philanthropy
Chairs: LaVerne Woods, Davis Wright Tremaine LLP, Seattle, WA; Carolyn O. (Morey) Ward, Ropes & Gray LLP, Washington, DC; Victoria B. Bjorklund, Simpson Thacher & Bartlett LLP, New York, NY; Tamara Watts, Bill & Melinda Gates Foundation, Seattle, WA; Ofer Lion, Seyfarth Shaw LLP, Los Angeles, CA; James P. Joseph, Arnold & Porter LLP, Washington, DC

7:30AM **Roundtable Discussion of Current Developments**

7:30AM – 8:30AM Burnham, Level 3B
Exempt Organizations Subcommittee on Religious Organizations
Chairs: Boyd J. Black, The Church of Jesus Christ of Latter-day Saints, Salt Lake City, UT; Thomas E. Wetmore, General Conference of Seventh-Day Adventists, Silver Spring, MD

7:30am **Roundtable Discussion of Current Developments**

7:30AM – 8:30AM Penn Quarter A, Level 1B
Tax Analysts Breakfast Forum With Lee Sheppard
(Hot meal will be available for all participants, beginning at 7:20AM) Lee Sheppard, a contributing editor of Tax Analysts' Tax Notes, is one of the nation's most widely read and respected tax commentators. Named one of the Global Tax 50 most influential players in international taxation in 2012 by International Tax Review, Sheppard specializes in financial issues and the taxation of multinational corporations. Her articles have included commentary on treaty issues, transfer pricing, European tax developments, and cutting-edge financial issues such as derivatives, hybrid securities, and hedge funds. Sheppard holds a law degree from the Northwestern University School

= Taped ★ = Young Lawyers Program = Ethics Credits Requested = No CLE Credit

of Law. After meeting with Lee Sheppard, please visit the Tax Analysts Exhibit Booth #1 throughout the day to meet and engage in interactive sessions with other Tax Notes editors and reporters.
Sponsored by: Tax Analysts

8:00AM – 11:00AM Constituition A, Level 3B
Administrative Practice
Chair: Kevin Johnson, Pepper Hamilton LLP, Philadelphia, PA

8:00am **Important Developments.** This panel will discuss important developments in IRS administrative practice since the last meeting.
Moderator: Jeremiah Coder, Greenburg Traurig LLP, San Francisco, CA
Panelists: Rochelle Hodes, Attorney-Adviser, Office of Tax Policy, Department of Treasury, Washington, DC; Kathryn A. Zuba, Deputy Associate Chief Counsel (Procedure and Administration), IRS, Washington, DC

8:40am **Memories Fade But Emails are Forever: New Electronic Discovery Rules in US Tax Court.** The US Tax Court held last fall in *Dynamo Holdings, LP v. Commissioner* that taxpayers could use predictive coding to help identify non-privileged electronically stored information in discovery requests. This is a first for the Tax Court. This will make electronic discovery requests less expensive for litigants and should speed up the process. This panel will discuss how predictive coding differs from manual discovery response, and cover implementation of predictive coding issues, such as selection of search terms and seed documents.
Moderator: Martin Press, Gunster Law Firm, Ft. Lauderdale, FL
Panelist: James Scarazzo, FTI Consulting, Washington, DC

10:00am **What's New in IRS Exam and Appeals.** This panel will discuss new procedures and processes in Large Business & International (LB&I) Division examinations and related processes in Appeals. LB&I has a year of experience with its new Information Document Requests procedures and recently described new examination procedures in a draft Publication 5125 (dated 7-2014). Appeals has also adopted new policies under its Appeals Judicial Approach and Culture (AJAC) project. The panel will examine the interaction of the new policies in both examination and Appeals.
Moderator: Fred Murray, Grant Thornton, Washington, DC
Panelists: Heather Maloy, Commissioner, LB&I Division, IRS, Washington, DC; Kirsten Wielobob, Chief, Appeals Office, IRS, Washington, DC

8:00AM – 10:45AM Independence FGH, Level 5B
Affiliated & Related Corporations
Chair: David Friedel, PwC, Washington, DC

8:00am **Current Developments.** This panel will address recent significant consolidated return regulations including the proposed "Next Day" rules as well as the final "Agency" rules.
Moderator: Olivia Ley, PwC, Washington, DC
Panelists: David Auclair, Grant Thornton LLP, Washington, DC; Neil Barr, Davis Polk & Wardwell LLP, New York, NY; Marie Milnes-Vasquez, Special Counsel, Associate Chief Counsel Corporate, IRS, Washington, DC; Russell Jones, Senior Counsel, Associate Chief Counsel Corporate, IRS, Washington, DC

9:30am **More "Known Unknowns" – How do Members of Consolidated Groups Recover "Previously Taxed Income?"** Consolidated groups are expanding internationally. Their foreign investments typically include entities that are disregarded for US tax purposes, entities that are treated as "partnerships," and entities that are treated as "corporations." When those regarded corporations (CFCs) generate subpart F income (or make investments in certain US property), the direct or indirect US shareholder faces current "cashless" income inclusions. Here are two things we know. We know the US shareholder is permitted to increase its adjusted basis in something to prevent inappropriate double-taxation in the event of a subsequent disposition. And we know that the US shareholder is supposed to treat subsequent distributions as "tax-free" (with commensurate stock basis reductions) since that's just a receipt of previously taxed income. There are several things we don't know. Some of those are "separate company" unknowns (like "how should the PTI pools of E&P and the section 961 basis associated therewith be allocated in connection with otherwise tax-free spin-off transactions?" and "exactly where should the basis increases and decreases be applied when there's a chain of foreign corporations owned through partnerships?"). In this panel we'll explore some of the "consolidated return" unknowns, with particular emphasis on the proposed section 959 regulations.

Moderator: Matthew White, KPMG LLP, Washington, DC

Panelists: Ronald Dabrowski, KPMG LLP, Washington, DC; Michael DiFronzo, PwC, Washington, DC; Michael Wilder, McDermott Will & Emery, Washington, DC; Marjorie Rollinson, Deputy Associate Chief Counsel (Technical), IRS Office of the Associate Chief Counsel – International, Washington, DC

8:00AM – 9:00AM Franklin/McPherson, Level 5B

Banking & Savings Institutions and Investment Management Joint Panel

Banking & Savings Institutions Chair: Daniel Mayo, KPMG LLP, New York, NY

Investment Management Chair: William P. Zimmerman, Morgan, Lewis & Bockius LLP, Philadelphia, PA

8:00am **The Tax Hedging Rules Revisited.** Financial institutions routinely use hedging transactions to manage risks related to governments in commodities and securities prices, currencies, and interest rates. Nevertheless, the current US tax hedging rules are insufficient to accommodate the growing need of financial institutions to manage such risks. This panel will explore the history and current state of the tax hedging rules, present the drawbacks and limited scope of the current regime, and put forth a proposal for modernizing the hedging rules.

Moderator: Yoram Keinan, Carter Ledyard & Milburn LLP, New York, NY

Panelists: David Garlock, EY, Washington, DC; Karl Walli, Senior Counsel (Financial Products), Office of Tax Legislative Counsel, Department of Treasury, Washington, DC; Amy B. Snyder, The Vanguard Group Inc., Malvern, PA; Mark Perwien, Senior Advisor to the Industry Director (Financial Products), IRS, New York, NY

Banking & Savings Institutions committee programs continue on page 33.
Investment Management committee programs continue on page 33.

8:00AM – 10:00AM Roosevelt/Wilson, Level 3B

Capital Recovery and Leasing

Chair: Alison Jones, EY, Washington, DC

8:00am **Current Developments Report and Update on Pending Guidance.** This panel will cover the important recent developments in the areas of capital recovery and leasing.

Moderator: Tracy Watkins, Grant Thornton LLP, Washington, DC

Panelists: Kathleen Reed, Branch Chief, Branch 7, Income Tax & Accounting, IRS, Washington, DC; Scott Dinwiddie, Special Counsel, Associate Chief Counsel – Income Tax & Accounting, IRS, Washington, DC; Kate Abdoo, McGladrey LLP, Washington, DC

8:30am **Tangible Property Regulations and the Real Estate Industry.** This panel will feature a cross-section of practitioner, government, and industry personnel and will provide a discussion around the effects that the tangible property regulations have had on the real estate industry and on various asset types (residential and nonresidential) with a focus on leasehold and tenant issues.

Moderator: Alison Jones, EY, Washington, DC

Panelists: Kathleen Reed, Branch Chief, Branch 7, Income Tax & Accounting, IRS, Washington, DC; Tom Yeates, EY, Philadelphia, PA

9:15am **Tangible Property Regulations Update – Continuation from the September Meeting – Industry Issues/Guidance, FAQs, and Related Discussions.** This panel will continue our discussion around the tangible property regulations specifically with respect to implementation issues faced by certain industries, as well as common tangible property regulation-related questions seen in the marketplace.

Moderator: Rayth Myers, EY, Washington, DC

Panelists: Kathleen Reed, Branch Chief, Branch 7, Income Tax & Accounting, IRS, Washington, DC; Scott Dinwiddie, Special Counsel, Associate Chief Counsel – Income Tax & Accounting, IRS, Washington, DC; Rachelle Bernstein, National Retail Federation, Washington, DC

8:00AM – 9:00AM Tiber Creek, Level 1B

Companions Breakfast *(Complimentary)*

8:00AM – 9:30AM Farragut Square, Level 5B

Employee Benefits Defined Contribution Plans Update

Presented by the Subcommittee on Defined Contribution Plans

Chair: Matthew Eickman, Qualified Plan Advisors, Overland Park, KS

Vice-Chairs: Puneet K. Arora, Towers Watson, Arlington, VA; Sarah J. Touzalin, Seyfarth Shaw LLP, Chicago, IL

Assistant Vice-Chairs: Annemarie McGavin, Buchanan Ingersoll, Washington, DC; Heather Stone Fletcher, Echert Seamans, Pittsburgh, PA

Immediate Past Chair: Bret Hamlin, Hill Ward Henderson, Tampa, FL

This meeting will examine recent and pending legislative and regulatory activity relating to section 401(k) plans and other defined contribution plans. It will also include discussion of emerging issues relating to lifetime income in defined contribution plans and fee disclosures, as well as recent litigation relating to and impacting defined contribution plans.

Panelists: Louis Campagna, Chief, Division of Fiduciary Interpretations, Office of Regulations and Interpretations, Employee Benefits Security Administration, Department of Labor, Washington, DC (Invited); William Evans, Attorney Advisor, Office of Benefits Tax Counsel, Department of Treasury, Washington, DC (invited); Seth Tievsky, Senior Technical Advisor, IRS, Washington, DC

8:00AM – 9:30AM Declaration, Level 1B

Employee Benefits Executive Compensation, Fringe Benefits and Federal Securities Law Update

Presented by the Subcommittees on Employee Benefits Executive Compensation and Fringe Benefits and Federal Securities Law

Chairs: Adam B. Cohen, Sutherland Asbill & Brennan LLP, Washington, DC; Charmaine Slack, Jones Day, New York, NY
Vice-Chairs: Elizabeth Drigotas, Deloitte Tax LLP, Washington, DC; Jessica Page, Meridian Compensation Consultants, Lake Forest, IL; Martha Steinman, Hogan Lovells, New York, NY
Assistant Vice-Chairs: Sandy Shurin, Deloitte Tax LLP, New York, NY; Jeffery Liebermann, Weil Gotshal & Manges LLP, New York, NY; Ali Fawaz, Proskauer, New York, NY

We will have a panel discussion on executive compensation for tax-exempt organizations, including, if they have been released, the section 457(f) regulations. We will also discuss the SEC's proposed hedging rules required by the Dodd-Frank Act and other recent executive compensation developments. Finally, we will have discussion with government representatives regarding the current executive compensation projects underway at Treasury and the IRS.
Panelists: Robert Neis, Deputy Benefits Tax Counsel, Office of Benefits Tax Counsel, Department of Treasury, Washington, DC (invited); Stephen Tackney, Deputy Associate Chief Counsel, IRS Office of Associate Chief Counsel (TEGE), Washington, DC (invited); Curtis Fisher, Bass Berry & Sims, Nashville, TN; Lori Oliphant, Winstead, Dallas, TX; Anthony Provenzano, Miller & Chevalier, Washington, DC; C. Alex Bahn, Hogan Lovells US LLP, Washington, DC

8:00AM – 10:45AM Independence DE, Level 5B
Estate & Gift Taxes
Chair: Laura S. Hundley, Holland & Hart LLP, Boulder, CO

8:00am **Current Developments.** This panel will review developments in federal estate, gift and generation-skipping transfer tax laws since January 2015.
Panelists: Jeffrey D. Chadwick, Winstead PC, The Woodlands, TX; Elizabeth R. Glasgow, Venable LLP, Los Angeles, CA and New York, NY; Catherine V. Hughes, Office of Tax Policy, Department of Treasury, Washington, DC

8:45am **Structuring Charitable Gifts: Blending Philanthropic Objectives with Tax Planning.** This panel will review different structures for charitable giving both during an individual's lifetime and at death, including the use of charitable split interest trusts, private foundations and donor advised funds. The panelists will also discuss the tax treatment for gifts of different types of property under each structure, as well as the flexibility of each structure to respond to the individual's charitable goals.
Panelists: Jennifer L. Franklin, Simpson Thacher & Bartlett LLP, New York, NY; Martin Hall, Ropes & Gray LLP, Boston, MA

9:45am **Top Ten Revenue Rulings for Estate Planners.** This program will review ten key Revenue Rulings that should be part of every estate planner's portfolio. The panel will begin with a summary of the provisions of each ruling. Where applicable, the panel will discuss what prompted the Department of Treasury to issue the ruling. The panel will then introduce practical planning tips for employing the rulings with illustrations of how these rulings have changed the way estate planners practice.
Panelists: Taylor P. Bechel, Venable LLP, Washington, DC; A. Christopher Sega, Venable LLP, Washington, DC; Katherine E. Ward, Venable LLP, Washington, DC

8:00AM – 10:45AM Constitution CDE, Level 3B
Partnerships & LLCs
Chair: Jeanne M. Sullivan, KPMG LLP, Washington, DC

8:00am **Partnership Compliance Issues.** This panel will discuss compliance issues involving partnerships (including large partnerships and TEFRA).
Moderator: Professor Noel P. Brock, West Virginia University, Morgantown, WV

Panelists: William J. Wilkins, Chief Counsel, Office of Chief Counsel, IRS, Washington, DC; Kenneth W. Gideon, Skadden Arps Slate Meagher & Flom LLP, Washington, DC

9:15am **Hot Topics in Partnership Taxation.** This panel will discuss significant recent developments related to subchapter K.

Moderator: Todd D. Golub, EY, Chicago, IL

Panelists: Kimberly S. Blanchard, Weil Gotshal & Manges LLP, New York, NY; Gregory M. Bopp, Bracewell & Giuliani LLP, Houston, TX; Benjamin H. Weaver, Attorney-Advisor, Office of Associate Chief Counsel (Passthroughs and Special Industries), IRS Office of Chief Counsel, Washington, DC

10:00am **May Company Regulations.** This panel will discuss the publication project concerning regulations under section 1.337(d)-3 relating to partnership transactions involving a corporate partner's stock or other equity interests.

Moderator: David H. Schnabel, Debevoise & Plimpton LLP, New York, NY

Panelists: Matthew E. Gareau, Deloitte Tax LLP, Washington, DC; Joseph Worst, Attorney-Advisor, Office of Associate Chief Counsel (Passthroughs and Special Industries), IRS Office of Chief Counsel, Washington, DC

8:30AM – 10:30AM Independence A, Level 5B

Foreign Activities of US Taxpayers

Chair: Joseph Calianno, Grant Thornton LLP, Washington, DC

8:30am **The Intersection of Partnerships & Subpart F.** Complexity exists in both the taxation of partnerships and in the subpart F regime, but when they intersect, things really get interesting. This panel will analyze issues that arise when the two worlds collide, including issues arising under section 956.

Moderator: Aaron A. Farmer, Farmer & Associates PLLC, Naples, FL

Panelists: Jennifer H. Alexander, Deloitte Tax LLP, Washington, DC; Barbara Rasch, Senior Technical Reviewer, Branch 2, IRS Office of the Associate Chief Counsel – International, Washington, DC; Brian Jenn, Attorney Advisor, Department of Treasury, Washington, DC

9:30am **Alternative Proposals for International Tax Reform.** This panel will analyze the tax technical and implementation aspects of alternative proposals for international tax reform, including proposals for a territorial tax or minimum tax regime.

Moderator: Professor Robert J. Peroni, The University of Texas School of Law, Austin, TX

Panelists: Tony Coughlan, Tax Counsel, Republican Staff, Senate Finance Committee, Washington, DC; Kathleen L. Ferrell, Davis Polk & Wardwell LLP, New York, NY; Danielle E. Rolfes, International Tax Counsel, Department of Treasury, Washington, DC

8:30AM – 11:30AM Independence BC, Level 5B

Individual and Family Taxation

Chair: Laura Baek, Senior Attorney Advisor, Taxpayer Advocate Service, IRS, Washington, DC

8:30am **Recent Developments in the Tax-Related Identity Theft.** Identity theft is an ongoing problem that impacts taxpayers and their representatives. The IRS has recently realigned the identity theft victim assistance unit. The panel will discuss how this realignment may impact victims. The panel will also discuss changes in how the

IRS will use Identity Protection Personal Identification Numbers (IP PINs). Finally, a representative from the Taxpayer Advocate Service will summarize findings from the identity theft research study included in the National Taxpayer Advocate's 2014 Annual Report to Congress.

Moderator: Joshua Beck, Attorney Advisor, Taxpayer Advocate Service, IRS, Washington, DC

Panelists: Denise Davis, Centralized Identity Theft Coordination, W&I, Accounts Management, IRS, Atlanta, GA; Justin K. Gelfand, Capes Sokol Goodman & Sarachan PC, St. Louis, MO; Christopher J. Lee, Senior Attorney Advisor, Taxpayer Advocate Service, IRS, Washington DC

10:00am **Affordable Care Act Implementation Issues Impacting Individuals and Families.** The 2015 filing season was the first in which the Affordable Care Act impacted individual taxpayers' tax returns. The panel will discuss problems encountered by both taxpayers and the IRS during this filing season. The panel will also discuss recently issued guidance and provide information on representing clients with ACA-related issues.

Moderator: Laura Baek, Senior Attorney Advisor, Taxpayer Advocate Service, IRS, Washington, DC

Panelists: Verlinda Paul, Director, Office of Program Coordination & Integration, W&I, IRS, Atlanta, GA; Philip Lindenmuth, Senior Level Counsel (Health Care), Office of Chief Counsel, IRS, Washington, DC; Christine Speidel, Vermont Legal Aid LITC, Springfield, VT

8:30AM – 10:30AM Bulfinch/Renwick, Level 3B

Tax Policy and Simplification

Chair: Professor Jonathan B. Forman, University of Oklahoma, Norman, OK

8:30am **US International Tax Reform: Does It Interact with the OECD Base Erosion and Profit Shifting (BEPS) Project and Other Developments Around the World? If So, How?** This panel will consider measures being adopted around the world both in connection with and apart from the OECD's BEPS project, and ask how actions being taken by other governments should affect US thinking about international tax reform.

Moderator: Professor Itai Grinberg, Georgetown University Law Center, Washington, DC

Panelists: George Callas, Chief Tax Counsel, House Ways and Means Committee, Washington, DC; Arlene S. Fitzpatrick, EY, Washington, DC; Eric Oman, Senior Policy Advisor, Senate Finance Committee, Washington, DC

9:30am **Tax and Spending Policy in the Long Run.** Economist C. Eugene Steuerle will discuss his recent book, *Dead Men Ruling: How to Restore Fiscal Freedom and Rescue Our Future* (Century Foundation Press 2014). In it, Dr. Steuerle explains that despite America's great wealth and strong economy, our politicians have already pre-committed government spending in ways that "crowd out" discretionary spending and leave us with very limited opportunities to make economically and socially productive investments. In this presentation, Dr. Steuerle will offer us a framework for regaining control of runaway spending, uncontrolled tax expenditures, and the long-term budget glide-path.

Moderator: Professor Jonathan B. Forman, University of Oklahoma, Norman, OK

Panelists: C. Eugene Steuerle, Richard B. Fisher Chair and Institute Fellow at the Urban Institute, Washington, DC; Barry Anderson, Deputy Director, National Governors Association, Washington, DC

8:45AM – 4:30PM Constitution B, Level 3B

Exempt Organizations

Chair: Robert A. Wexler, Adler & Colvin, San Francisco, CA

8:45am **Committee Business**

9:00am **News from the IRS and Treasury.** Representatives from Department of Treasury and IRS Chief Counsel's Office will speak on recent developments and guidance.

Moderator: Robert A. Wexler, Adler & Colvin, San Francisco, CA

Panelists: Ruth M. Madrigal, Attorney-Advisor, Office of Tax Policy, Department of Treasury, Washington, DC; Eric San Juan, Senior Technical Advisor, TEGE, IRS, Washington, DC; Victoria A. Judson, Associate Chief Counsel, IRS Office of Associate Chief Counsel (TEGE), Washington, DC; Janine Cook, Deputy Associate Chief Counsel, TEGE, IRS, Washington, DC

10:00am **News from the Hill.** This panel will discuss current, pending, and proposed legislation affecting tax-exempt organizations.

Moderator: Alexander L. Reid, Morgan Lewis and Bockius, Washington, DC

Panelists: Gordon M. Clay, Legislation Counsel, Joint Committee on Taxation, Washington, DC; Harold Hancock, Tax Counsel, House Ways and Means Committee, Washington, DC; Tiffany Smith, Tax Counsel, Senate Finance Committee, Washington, DC

11:15am **The EO Practitioner's Perspective: Addressing Common Exempt Organizations Issues that Lack Up-to-Date Guidance.** This panel will address how practitioners can navigate some key tax issues without up-to-date guidance.

Moderator: Catherine E. Livingston, Jones Day, Washington, DC

Panelists: Andras Kosaras, Arnold & Porter LLP, Washington, DC; Suzanne Ross McDowell, Steptoe & Johnson LLP, Washington, DC

12:30pm **Exempt Organizations Committee Luncheon** *(Ticketed Event)*
Sunita Lough, commissioner of TE/GE will discuss issues of importance to the full range of taxpayers that fall under the jurisdiction of TE/GE. In addition to exempt organization practitioners, practitioners who work with tax-exempt bonds, government entities, and employee plans are encouraged to attend.

Speaker: Sunita Lough, Commissioner, Tax Exempt and Government Entities Division, IRS, Washington, DC

2:00pm **Energy Crisis? Climate Change? The Future of Exempt Organizations Focused on Energy and the Environment.** This panel will discuss the current and future role of exempt organizations that address environmental and energy issues. Is the legal climate changing on how the IRS views these organizations.

Moderator: David Shevlin, Simpson Thacher Bartlett LLP, New York, NY

Panelist: Tomer J. Inbar, Patterson Belknap Webb & Tyler LLP, New York, NY; Lois R. DeBacker, Kresge Foundation, Troy, MI

3:00pm **Volunteers in Exempt Organizations.** This panel will address key legal issues involved in using volunteers as part of exempt organizations.

Moderator: Ofer Lion, Seyfarth Shaw LLP, Los Angeles, CA

Panelist: Donella M. Wilson, Green Hasson Janks, Los Angeles, CA

4:00pm **Cash Bar**

9:00AM – 10:45AM Lafayette Park, Level 5B

Banking & Savings Institutions

Chair: Daniel Mayo, KPMG LLP, New York, NY

9:00am **Recent Developments on Modifications of Non-Debt Financial Instruments.** The issue as to when a modification of a non-debt financial instrument results in a deemed sale or exchange of the instrument is still largely unresolved. This panel will focus on recent use of the debt modification regulations by the IRS beyond the limited scope of the regulations and the restricted use of the regulations in situations in which the regulations seemed to be directly on point.

Moderator: Mark Leeds, Mayer Brown, New York, NY

Panelist: Lisa Chippindale, Royal Bank of Canada, Toronto, ON

10:00am **Section 871(m) Final Regulations.** This panel will explore the new 871(m) regulations as they relate to US withholding on cross border equity derivatives. The panel will touch on issues affecting the US equity dealers as well as investors.

Moderator: Anthony Tuths, Withum Smith + Brown, New York, NY

Panelists: Karl Walli, Senior Counsel (Financial Products), Office of Tax Legislative Counsel, Department of Treasury, Washington, DC; Michael Shulman, Shearman & Sterling, Washington, DC

9:00AM – 3:00PM

Companion Activity *(Ticketed Event)*

The Capitol Experience: Private Tour of the Capitol and Library of Congress. The bus will depart promptly at 9:00am from the Grand Hyatt's 10th Street entrance. The bus will return guests to the hotel after lunch.

9:00AM – 10:45AM Franklin/McPherson, Level 5B

Investment Management

Chair: William P. Zimmerman, Morgan, Lewis & Bockius LLP, Philadelphia, PA

9:00am **Current Regulated Investment Company Issues.** This panel will discuss legislative, regulatory and international tax issues affecting regulated investment companies and their shareholders that are currently being addressed by the Investment Company Institute and the IRS.

Moderator: Karen Gibian, Investment Company Institute, Washington, DC

Panelists: Ryan Lovin, Investment Company Institute, Washington, DC; Steven Harrison, Financial Institutions & Products, IRS Office of Chief Counsel, Washington, DC; Julanne Allen, Financial Institutions & Products, IRS Office of Chief Counsel, Washington, DC; Susan Thompson Baker, Financial Institutions & Products, IRS Office of Chief Counsel, Washington, DC

10:00am **Tax Planning for Non – US Investors in Debt Funds.** This panel will focus on strategies debt funds may consider to minimize effectively connected income (ECI) arising from loan origination and workouts.

Moderator: Raj Tanden, Buchalter Nemer PC, Los Angeles, CA

Panelists: David S. Miller, Cadwalader Wickersham & Taft LLP, New York, NY; Amanda H. Nussbaum, Proskauer Rose LLP, New York, NY; Elena Virgadamo,

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Attorney Advisor, Office of International Tax Counsel, Office of Tax Policy, Department of Treasury, Washington, DC

9:30AM – 11:00AM Farragut Square, Level 5B

Employee Benefits Administrative Practices Update

Presented by the Subcommittee on Self-Correction, Determination Letters and Other Administrative Practices

Chairs: Stefan P. Smith, Locke Lord LLP, Dallas, TX; Christina Crockett, Ogletree Deakins Nash Smoak & Stewart PC, Washington, DC

Vice-Chairs: Thomas R. Pevarnik, Deloitte, Washington, DC; Rhonda Migdail, Keightley & Ashner LLP, Washington, DC

Assistant Vice-Chair: Venessa Vargas, Grant Thornton LLP, Los Angeles, CA

Immediate Past Chair: Lisa Tavares, Venable LLP, Washington, DC

The panel will discuss the eligibility requirements and relief available under the Department of Labor's Voluntary Fiduciary Correction Program (VFCP), and the status of proposed changes to remedial amendment periods and other administrative practices under the Secure Annuities for Employee (SAFE) Retirement Act of 2013. The panel also will discuss current topics in correcting plan compliance issues under the Employee Plans Compliance Resolution System (EPCRS) and the ongoing transfer of some legal functions from the Tax-Exempt and Government Entities Division to the IRS Office of Chief Counsel. There will be an open forum to discuss issues concerning the determination letter program, EPCRS, and other related topics.

Panelists: Lisa Scimeca, Associate Regional Director, Department of Labor, Employee Benefits Security Administration, Philadelphia, PA (Invited); Preston Rutledge, Tax and Benefits Counsel, Senate Finance Committee (Majority), Washington, DC (Invited); Ingrid Grinde, Attorney, IRS Office of Associate Chief Counsel (TEGE), Washington, DC (Invited); Joyce Kahn, Branch Chief, IRS Office of Associate Chief Counsel (TEGE), Washington, DC (Invited); Victoria A. Judson, Associate Chief Counsel, IRS Office of Associate Chief Counsel (TEGE), Washington, DC (Invited); Seth Tievsky, Senior Technical Advisor, IRS, Washington, DC

9:30AM – 10:30AM Arlington/Cabin John, Level 3B

Employee Benefits Litigation Update

Presented by the Subcommittees on Litigation, ESOPs and Fiduciary Responsibility and Plan Investments

Chairs: Sara Pikofsky, Jones Day, Washington, DC; Erin Turley, K&L Gates LLP, Dallas, TX; Erin M. Sweeney, Miller & Chevalier Chartered, Washington, DC

Vice-Chair: Michael Bartolic, The Law Offices of Michael Bartolic LLC, Chicago, IL; David A. Whaley, Dinsmore & Shohl, Cincinnati, OH; David A. Cohen, Evercore Trust Company NA, Washington, DC; Fritz Richter III, Bass Berry & Sims PLC, Nashville, TN

Assistant Vice-Chairs: Rita Patel, DLA Piper LLP, Washington, DC; Jessica N. Agostinho, Hunton & Williams LLP, Washington, DC; Carolyn M. Rhodes, KPMG LLP, Washington, DC; Benjamin J. Evans, Bingham Greenebaum Doll LLP, Louisville, KY; Daniel R. Salemi, Franczek Radelet PC, Chicago, IL; Vadim Avdeychik, PIMCO LLC, New York, NY

The panel will discuss recent ERISA litigation cases.

Panelists: Sara Pikofsky, Jones Day, Washington, DC; Jessica Agostinho, Hunton & Williams, Washington, DC; Erin M. Sweeney, Miller & Chevalier Chartered, Washington, DC; Fritz Richter III, Bass Berry & Sims PLC, Nashville, TN; David A. Cohen, Evercore Trust Company NA, Washington, DC; Daniel R. Salemi, Franczek Radelet PC, Chicago, IL; Vadim Avdeychik, Willkie Farr & Gallagher LLP, New York, NY; Erin Turley, K&L Gates LLP, Dallas, TX; David A. Whaley, Dinsmore & Shohl, Cincinnati, OH; Benjamin Evans, Bingham Greenebaum Doll, Louisville, KY; Carolyn M. Rhodes,

KPMG LLP, Washington, DC; Andrew L. Oringer, Dechert LLP, New York, NY; Susan Hoffman, Littler, Philadelphia, PA

9:30AM – 10:45AM Declaration, Level 1B

Employee Benefits Mergers & Acquisitions Update

Presented by the Subcommittee on Mergers & Acquisitions
Chairs: Laura R. Westfall, King & Spalding, New York, NY; Gail W. Stewart, Baker Botts LLP, Houston, TX
Vice-Chair: Carrie Simons, Ropes & Gray, Boston, MA
Assistant Vice-Chair: Elinor Hindsley, Williams Mullen, Richmond, VA

Current 280G and 409A Issues in M&A Deals. Code section 280G (relating to golden parachute payments) and Code section 409A (relating to nonqualified deferred compensation arrangements) are not new, but both sections have had a continuing impact on the executive compensation and employee benefits-related aspects of M&A transactions. After a review of the fundamentals of sections 280G and 409A, panelists will share their perspectives and discuss specific issues under sections 280G and 409A that continue to arise and be problematic for companies (and their counsel) during the course of such transactions.

Panelists: Laura R. Westfall, King & Spalding, New York, NY; Gail W. Stewart, Baker Botts LLP, Houston, TX; Carrie Simons, Ropes & Gray LLP, Boston, MA; Elizabeth Drigotas, Deloitte Tax LLP, Washington, DC; Andrew Oringer, Dechert LLP, New York, NY; Andrew Liazos, McDermott Will & Emery, Boston, MA; Regina Olshan, Skadden Arps Slate Meagher & Flom LLP, New York, NY

10:00AM – 11:00AM Latrobe, Level 3B

Appointments to the Tax Court *(Executive Session)*

Chair: Pamela Olson, PwC, Washington, DC

10:00AM – 12:00PM Burnham, Level 3B

Employee Benefits Welfare Plans, Cafeteria Plans and Reimbursement Accounts, and EEOC Issues Update

Presented by the Subcommittee on Welfare Plan and EEOC, FMLA and Leaves Issues
Chairs: Linda Mendel, Vorys Sater Seymour & Pease LLP, Columbus, OH; Helen Morrison, EY, Washington, DC
Vice-Chairs: William M. Freedman, Dinsmore & Shohl LLP, Cincinnati, OH; Gabriel S. Marinaro, Drinker Biddle & Reath LLP, Chicago, IL
Assistant Vice-Chairs: Yelena Fertman Gray, Ungaretti & Harris LLP, Chicago, IL; Elena Kaplan, Jones Day, Atlanta, GA

This meeting will address reporting under Code §6055 and 6056, communicating eligibility standards to employees, guidance on employer payment plans, and regulatory and sub-regulatory developments under the Affordable Care Act.

Panelists: Alden Bianchi, Mintz Levin Cohn Ferris and Popeo PC, Boston, MA; William M. Freedman, Dinsmore & Shohl LLP, Cincinnati, OH; Yelena Fertman Gray, Nixon Peabody LLP, Chicago, IL; Elena Kaplan, Jones Day, Atlanta, GA; Rachel Leiser Levy, Groom Law Group, Washington, DC; Gabriel S. Marinaro, Smith Haughey Rice & Roegge, Ann Arbor, MI; Linda Mendel, Vorys Sater Seymour & Pease LLP, Columbus, OH; Helen Morrison, EY, Washington, DC; Kevin Knopf, Senior Technical Reviewer, IRS Office of Associate Chief Counsel (TEGE), Washington, DC (invited); Stephen Tackney, Deputy Associate Chief Counsel, IRS Office of Associate Chief Counsel (TEGE), Washington, DC (invited); Amy Turner, Senior Advisor, Department of Labor, Washington, DC; Christa Bierma, Attorney-Advisor, Office of Benefits Tax Counsel, Department of Treasury, Washington, DC (invited); Shad Fagerland, Attorney, IRS Office of Associate Chief Counsel (TEGE), Washington, DC

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10:30AM – 12:30PM Independence A, Level 5B

Transfer Pricing

Chair: E. Miller Williams, EY, Washington, DC

10:30am **How Will IRS's Transfer Pricing Operations Move Forward in the BEPS Environment?** This panel will review the current status of the work being done under BEPS Action Items 8 through 10 and 14, which have the most direct relationship to the activities of the IRS's Transfer Pricing Operations. The panel will discuss how the IRS believes this work will relate to substantive interpretations of transfer pricing principles and their implementation and application in examination and competent authority going forward. The panel will also attempt to predict what the transfer pricing landscape will look like at the 2016 ABA May Meeting as various countries interpret and implement their own approaches to the BEPS Action Items, which will include a discussion of the soon-to-be implemented UK Diverted Profits Tax.

Moderator: David Canale, EY, Washington, DC

Panelists: David Varley, Director (Acting), Transfer Pricing Operations, IRS – Large Business and International, Washington, DC; Kenneth Wood, Senior Advisor to the Director of Transfer Pricing Operations, LB&I, IRS, Washington, DC; Christopher Bello, Branch Chief for Branch 6, IRS – Office of the Associate Chief Counsel – International, Washington, DC; Brian Jenn, Attorney Advisor, Department of Treasury, Washington, DC

11:30am **Advance Pricing and Mutual Agreement (APMA) – Hot Topics.** This panel will discuss current developments from APMA. At present, expected topics include the status of US–India competent authority matters and the potential for US–India bilateral APAs, as well as views on the relationships with other treaty partners; and the status of the CA and APA revenue procedures and the relationship between APMA's practices and procedures and the work of the FTA MAP Forum.

Moderator: Samuel M. Maruca, Covington & Burling LLP, Washington, DC

Panelists: Hareesh Dhawale, Director, Advance Pricing and Mutual Agreements (APMA) Program, IRS – Large Business and International, Washington, DC; John Hughes, Senior Manager, Advance Pricing and Mutual Agreements (APMA) Program, IRS – Large Business and International, Washington, DC; Darrin Litsky, Deloitte Tax LLP, New York, NY

11:00AM – 1:15PM Roosevelt/Wilson, Level 3B

Employee Benefits Distributions and Defined Benefit Plans Updates

Presented by the Subcommittees on Distributions and Defined Benefit Plans

Chairs: Juan Valcarce, Shell Oil Company, Houston, TX; Serena G. Simons, The Segal Group, Washington, DC

Vice-Chairs: Anne M. Meyer, Snell & Wilmer, LLP, Phoenix, AZ; John H. Wendeln, Thompson Hine LLP, Cincinnati, OH; Sarah E. Fry, Culhane Meadows PLLC, Dallas, TX; Rosina Barker, Ivans Phillips & Barker, Washington, DC

Assistant Vice-Chairs: J. Rose Zaklad, Groom Law Group, Washington, DC; Laura M. Nolen, Marathon Oil Corporation, Houston, TX; Allison Hoots, Fox Rothschild LLP, Philadelphia, PA; Meredith VanderWilt, Polsinelli PC, Dallas, TX

PBGC Liasion: Harold J. Ashner, Keightley & Ashner LLP, Washington, DC

11:00am **PBGC Fireside Chat**

11:30am **The Subcommittees will discuss issues of interest affecting defined benefit plans and distributions.** Topics to be discussed will include: a PBGC update; an overview and discussion of the Multiemployer Pension Reform Act of 2014 (MPRA); lifetime income issues; uncashed check issues including issues related to required minimum distributions; and as time permits, a discussion of emerging issues. The first segment of the meeting will be devoted to defined benefit issues and will include an informal "fireside chat" discussion with PBGC representatives on topics of interest to attendees.

Panelists: Israel Goldowitz, Chief Counsel, Pension Benefit Guaranty Corporation, Washington, DC (invited); Judith Starr, General Counsel, Pension Benefit Guaranty Corporation, Washington, DC (invited); Catherine B. Klion, Assistant General Counsel for Regulatory Affairs, Pension Benefit Guaranty Corporation, Washington, DC (invited); Harlan Weller, Senior Actuary, Department of Treasury, Washington, DC (invited); Linda S. Marshall, Senior Counsel, IRS Office of Associate Chief Counsel (TEGE), Washington, DC (invited); Kyle N. Brown, Special Counsel, IRS Office of Associate Chief Counsel (TEGE), Washington, DC (invited)

11:00AM – 12:00PM Declaration, Level 1B

Employee Benefits Exempt Organization and Governmental Plans Update

Presented by the Subcommittee on Exempt Organization and Governmental Plans

Chairs: Craig R. Pett, Alston & Bird LLP, Atlanta, GA; Bruce Barth, Robinson & Cole LLP, Hartford, CT

Vice-Chairs: Don Wellington, Steptoe & Johnson, Los Angeles, CA; Blake McKay, Alston & Bird, Atlanta, GA

Assistant Vice-Chairs: Meghan M. Lynch, Aon Hewitt, Houston, TX; Robert Johnson, Kaufman & Canoles PC, Newport News, VA

This session will include a discussion on Affordable Care Act implementation issues unique to governmental plans; correcting errors in 457(b) and 457(f) plans, and pending IRS guidance impacting governmental plans. If new guidance is issued prior to the meeting, the agenda may be changed to include a discussion of the new guidance. Representatives of the IRS and Department of Labor will be invited to participate.

Panelists: Craig R. Pett, Alston & Bird LLP, Atlanta, GA; Susan E. Rees, Chief, Division of Coverage, Reporting and Disclosure, Office of Regulations and Interpretations, Employee Benefits Security Administration, Department of Labor, Washington, DC (Invited); Victoria A. Judson, Associate Chief Counsel, IRS Office of Associate Chief Counsel (TEGE), Washington, DC (Invited); Pamela R. Kinard, Senior Technical Reviewer, IRS Office of Associate Chief Counsel (TEGE), Washington, DC (Invited); Ingrid Grinde, Attorney, IRS Office of Associate Chief Counsel (TEGE), Washington, DC (Invited); Seth Tievsky, Senior Technical Advisor, IRS, Washington, DC (Invited)

11:00AM – 12:00PM Farragut Square, Level 5B

Employee Benefits Fiduciary Responsibilities Update

Presented by the Subcommittee on Fiduciary Responsibility

Chair: Erin M. Sweeney, Miller & Chevalier Chartered, Washington, DC

Vice-Chairs: David A. Cohen, Evercore Trust Company NA, Washington, DC; Fritz Richter III, Bass Berry & Sims PLC, Nashville, TN

Assistant Vice-Chairs: Daniel R. Salemi, Franczek Radelet PC, Chicago, IL; Vadim Avdeychik, PIMCO LLC, New York, NY

The panel will discuss guidance issued addressing ERISA fiduciary responsibilities.

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Panelists: Erin M. Sweeney, Miller & Chevalier Chartered, Washington, DC, David A. Cohen, Evercore Trust Company NA, Washington, DC; Fritz Richter III, Bass Berry & Sims PLC, Nashville, TN; Vadim Avdeychik, PIMCO, New York, NY; Daniel R. Salemi, Franczek Radelet PC, Chicago, IL; Andrew L. Oringer, Dechert LLP, New York, NY

11:00AM – 12:00PM Penn Quarter A, Level 1B

Employee Benefits Legislative Update

Presented by Subcommittee on Employee Benefits Legislation

Chair: Gary Chase, Towers Watson, New York, NY

Vice-Chair: Lisa Bleier, Securities Industry and Financial Markets Association (SIFMA), Washington, DC

Assistant Vice-Chairs: Professor Jonathan B. Forman, University of Oklahoma, Norman, OK; Judy M. Hensley, Roberts & Holland LLP, New York, NY

This meeting will focus on current legislative developments that impact employee benefit plans and arrangements, including the Congressional outlook for 2015, as impacted by the changes this year to the Senate and House leadership. In addition, we will discuss the current status of legislation in the states that will impact employee benefit plans, including continued activity on state run retirement plans.

Panelists: Lisa Bleier, Securities Industry and Financial Markets Association (SIFMA), Washington, DC; Professor Jonathan B. Forman, University of Oklahoma, Norman, OK; Judy M. Hensley, Roberts & Holland LLP, New York, NY; Preston Rutledge, Tax and Benefits Counsel, Senate Finance Committee (Majority), Washington, DC (Invited); Michael Kreps, Pensions Counsel, Senate HELP Committee, Washington, DC

11:00AM – 11:30AM Latrobe, Level 3B

Employee Benefits New Employee Benefits Attorneys Forum

Chair: Laura R. Westfall, King & Spalding, New York, NY

Informal meeting for new members of the Employee Benefits Committee.

11:00AM – 12:30PM Lafayette Park, Level 5B

Energy & Environmental Taxes

Chair: Peter Lowy, Caplin & Drysdale, New York, NY

11:00am **Energy Taxes Hot Topics Update.** This panel will provide insights on important tax law developments for both traditional and alternative energies. Under the current GOP control of both houses of Congress, focus has shifted to the balance of tax incentives to encourage investment in traditional energy sources versus renewable sourced energy. Panelists will discuss legislative proposals and momentum for these categories of tax incentives. The panel will also highlight administrative guidance recently issued and in the pipeline, and recent court decisions, including issues involving the Treasury Section 1603 Grant-in-Lieu of Tax Credit program, the Investment Tax Credit, and specifically the Begun Construction test for the retroactive extension of the again-expired Production Tax Credit and Investment Tax Credit in lieu thereof.

Panelists: Amish Shah, Sutherland Asbill, Washington, DC; Courtney Sandifer, PwC, Washington, DC; Jaime Park, Branch Chief, Branch 6, Passthroughs and Special Industries, IRS, Washington, DC; Bryce Pressentin, American Petroleum Institute, Washington, DC; Jennifer Bernardini, Attorney, Passthroughs & Special Industries, Office of Chief Counsel, IRS, Washington, DC

11:00AM – 12:00PM Washington Boardroom, Level 3B
Membership & Marketing CLE
Chair: Kathryn Keneally, New York, NY

11:00AM – 1:45PM Tiber Creek, Level 1B
S Corporations 📼
Chair: Laura Howell-Smith, Deloitte Tax LLP, Washington, DC

11:00am **Important Developments.** Discussion of recent legislative, administrative and judicial developments relating to S Corporations and their Shareholders.
Moderator: Brad Gould, Dean Mead Minton & Zwemer, Ft. Pierce, FL
Panelists: Michala Irons, Barnes & Thornburg LLP, Indianapolis, IN; Bryan Keith, Grant Thornton LLP, Washington, DC

11:45am **Hot Topics Relating to S Corporations.** A dialogue with representatives from the Government about developments relevant to S Corporations and companies considering making S Corporation elections.
Moderators: Paul F. Kugler, KPMG LLP, Washington, DC; Carol Kulish Harvey, KPMG LLP, Washington, DC
Panelists: Mark E. Warren, Tax Counsel, House Ways and Means Committee, Washington, DC; Benjamin Willis, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC; Caroline Hay, Office of Associate Chief Counsel, Passthroughs & Special Industries, IRS, Washington, DC

12:45pm **Section 1374(d)(7) Recognition Period.** Discussion of the general rules of the corporate level taxation on disposition of assets with built-in gains. Particularly, this panel will discuss the recent temporary reductions in the recognition period for 2009-2011 and for 2012-2014.
Moderator: Jennifer Gurevitz, Gray Reed & McGraw PC, Dallas, TX
Panelist: Michael Gould, IRS Office of Chief Counsel, Washington, DC

11:00AM – 1:45PM Constitution CDE, Level 3B
Standards of Tax Practice 📼⚖
Chair: Professor Linda M. Beale, Wayne State University Law School, Detroit, MI

11:00am **Ethical Issues in Federal Tax Practice — The Government Perspective.**⚖ This panel will provide an update on recent guidance from the IRS and Department of Treasury and will discuss recent developments at the IRS Office of Professional Responsibility. Topics to be covered will include published final determinations in OPR disciplinary proceedings.
Moderator: Bradley Ridlehoover, McGuireWoods LLP, Richmond, VA
Panelists: Karen L. Hawkins, Director, IRS Office of Professional Responsibility, Washington, DC; Emily M. Lesniak, Special Counsel (Procedure and Administration), IRS, Washington, DC

12:05pm **Initiating a New Client Engagement: What Kinds of Ethical and Practice Standards Questions Arise for a New Client Representation?**⚖ Tax advisors often initiate new client engagements and sometimes may overlook considerations that should come into play at the outset. Questions to be considered include: What is the scope of the representation? Who is the client? When should fees be discussed, and with whom? When are flat fees appropriate? Are there potential conflicts of interest and how should those be resolved? Are there any illness or competency questions

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that the practitioner should consider? How should communications with a potential new client be handled? What kind of firm procedures should be in place in this area? What are some practical issues to consider when dealing with your insurance carrier? This panel will explore these and other questions practitioners face when taking on a new client.

Moderator: Brian Ketcham, Kostelanetz & Fink LLP, New York, NY

Panelists: Scott F. Hessell, Sperling & Slater PC, Chicago, IL; Guinevere Moore, Holland & Knight LLP, Chicago, IL; D. Loren Washburn, ClydeSnow, Salt Lake City, UT; Jason Freeman, Meadows Collier, Dallas, TX

Standards of Tax Practice Co-Sponsored Programs:

2:00pm **Co-Sponsored with State and Local Taxes**
'Just Add SaLT!' When and How to Consider State Tax Ethical Issues in Advising Clients *(Please see page 47 for more information.)*

4:00pm **Co-Sponsored with Diversity**
Ensuring Ethical Client Solicitations *(Please see page 50 for more information.)*

11:30AM – 12:30PM Independence DE, Level 5B

Court Procedure and Practice Roundtable Discussion

Chair: Mark D. Allison, Caplin & Drysdale, New York, NY

11:30am **First Time Tax Litigation.** This roundtable discussion will focus on tactics and strategies for first time litigators in tax cases, including the stipulation process, the use of expert reports, the evidentiary rules most likely to be encountered, presentation of fact and expert witnesses, and brief writing.

Moderator: Frank Agostino, Agostino & Associates, Hackensack, NJ

Panelists: The Honorable Ronald L. Buch, Judge, US Tax Court, Washington, DC; The Honorable Carolyn P. Chiechi, Judge, US Tax Court, Washington, DC; Thomas J. Travers, Assistant Division Counsel, Office of Chief of Counsel, IRS, Washington, DC

COMMITTEE LUNCHEONS

12:00PM – 1:30PM Constitution A, Level 3B

Corporate Tax and Affiliated & Related Corporations *(Ticketed Event)*

12:00PM – 12:30PM Arlington/Cabin John, Level 3B

Diversity *(Ticketed Event)*

12:00PM – 1:30PM McPherson Square, Level 5B

Estate & Gift Taxes and Fiduciary Income Tax Young Lawyers Subcommittees *(Ticketed Event)*

Fundamentals of Charitable Contribution Deductions. The availability of an income tax deduction for charitable contributions depends on many factors, including the type of property being donated (e.g., cash, securities or tangible property), the type of charitable organization receiving the property (e.g., a public charity or a private foundation), and various percentage limitations based on the donor's income. This panel will review these factors and other fundamentals of charitable deductions, including qualified appraisals and other substantiation requirements.

Panelists: Victor S. Chang, Ivins Phillips & Barker, Washington, DC; Michael J. Nicolini, US Trust, Washington, DC

12:00PM – 1:00PM Arnold & Porter LLP
Partnerships & LLCs and Real Estate Committees Luncheon *(Ticketed Event)*
Speaker: The Honorable Cary Douglas Pugh, Judge, United States Tax Court, Washington, DC

12:00PM – 12:30PM Banneker, Level 1B
State & Local Taxes Luncheon *(Ticketed Event)*

12:30PM – 1:30PM Independence FGHI, Level 5B
Administrative Practice and Court Procedure & Practice *(Ticketed Event)*
Sponsored by: Caplin & Drysdale, Kostelanetz & Fink, LLP, McDermott Will & Emery, Miller & Chevalier Chartered, Thompson & Knight LLP, Thompson Hine LLP and KPMG LLP

12:30PM – 1:30PM Constituition B, Level 3B
Exempt Organizations Committee Luncheon *(Ticketed Event)*
Sunita Lough, commissioner of TE/GE will discuss issues of importance to the full range of taxpayers that fall under the jurisdiction of TE/GE. In addition to exempt organization practitioners, practitioners who work with tax-exempt bonds, government entities, and employee plans are encouraged to attend.
Speaker: Sunita Lough, Commissioner, Tax Exempt and Government Entities Division, IRS, Washington, DC
Sponsored by: Glenmede

12:30PM – 1:30PM Independence A, Level 5B
FAUST, FLF, Transfer Pricing & USAFTT *(Ticketed Event)*

1:45PM – 2:45PM Declaration A, Level 1B
Banking & Savings Institutions, Financial Transactions, Insurance Companies, Investment Management and Tax Exempt Financing *(Ticketed Event)*

1:45PM – 2:45PM The Hamilton
Civil & Criminal Tax Penalties *(Ticketed Event)*
Sponsored by: Hochman, Salkin, Rettig, Toscher & Perez, P.C., Kostelanetz & Fink, LLP, Greenberg Traurig, LLP and O'Connor Davies, LLP

12:00PM – 1:00PM Latrobe, Level 3B
Employee Benefits ESOP Update
Presented by the Subcommittee on ESOPs
Chair: Erin Turley, K&L Gates LLP, Dallas, TX
Vice-Chair: David A. Whaley, Dinsmore & Shohl, Cincinnati, OH
Assistant Vice-Chairs: Carolyn M. Rhodes, KPMG LLP, Washington, DC; Benjamin J. Evans, Bingham Greenebaum Doll LLP, Louisville, KY
This meeting will include a panel discussion to address developments in ESOP regulatory, enforcement and litigation activities by the Department of Labor and the IRS. This panel also hopes to discuss the ESOP regulatory project and the status of the pre-approved ESOP document with IRS representatives.
Panelists: Dominic DeMatties, Attorney Advisor, Office of Benefits Tax Counsel, Department of Treasury, Washington, DC (Invited); John T. Ricotta, Branch Chief, IRS Office of Associate Chief Counsel (TEGE), Washington, DC (Invited); Robert E. Gertner, Attorney, IRS Office of Associate Chief

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Counsel (TEGE), Washington, DC (Invited); Michael Schloss, Counsel for Financial Litigation, Office of the Solicitor, Division of Plan Benefits Security, Department of Labor, Washington, DC (Invited)

12:00PM – 1:15PM Penn Quarter A, Level 1B

Employee Benefits Multinational Employee Benefits & Compensation Issues

Presented by the Subcommittee on Multinational Employee Benefits & Compensation Issues

Chair: Mark C. Jones, Pillsbury Winthrop Shaw Pittman LLP, Los Angeles, CA

Vice-Chairs: Rob Fowler, Baker Botts LLP, Houston, TX; Veena Murthy, KPMG LLP, Washington, DC; David W. Powell, Groom Law Group Chartered, Washington, DC

Assistant Vice-Chair: Karen D. Youngstrom, Thompson Hine LLP, Cleveland, OH

The Subcommittee will discuss recommendations for guidance and relief on the application of section 402(b) to funded foreign plans. We will also discuss recent trends in structuring cross-border equity compensation as reflected in Deloitte's Global Share Plan Survey. In addition, we will discuss emerging issues for multinational employers relating to cross-border pensions and employee benefits, including proposed changes to qualified stock awards in France.

Moderator: Mark C. Jones, Pillsbury Winthrop Shaw Pittman LLP, Los Angeles, CA

Panelists: Amy Reina, Deloitte Tax LLP, Stamford, CT; Veena K. Murthy, KPMG LLP, Washington, DC; David W. Powell, Groom Law Group, Chartered, Washington, DC

12:00PM – 1:15PM Burnham, Level 3B

Employee Benefits Multiple Employers, PEOs and Controlled Groups Update

Presented by the Subcommittee on Multiple Employers, PEOs and Controlled and Affiliated Service Groups

Chair: Carol L. Myers, Williams Parker Harrison Dietz & Getzen, Sarasota, FL

Vice Chair: Charles G. Humphrey, Law Office of Charles G. Humphrey, Andover, MA

Assistant Vice Chair: Devin M. Karas, Reid and Riege PC, Hartford, CT

The Subcommittee will discuss current issues in benefit plans operating in alternative employment and benefit arrangements such as PEOs or multiple employer plans, including a discussion of the recommendations made by the Advisory Council on Employee Welfare and Pension Benefit Plans in its November 2014 report to the Secretary of Labor on the Outsourcing of Employee Benefit Plan Services. The Subcommittee expects that discussion to focus on the Council's recommendation to DOL to consider how it can facilitate the use of multiple employer plans. The Subcommittee anticipates an open discussion of the potential impact on multiple employer plans of the recent 6th Circuit decision *Girl Scouts of Middle Tennessee Inc. v. Girl Scouts of the USA*. In addition, we will circulate and discuss a proposed white paper on the section 413(c) one bad apple rule that applies to multiple employer plans, including discussion of whether MEPs currently have a viable means of preventing disqualification of the plan when the plan's potential qualification problem results from participating employers who are unable to or refuse to respond or provide information to the plan's primary sponsor and plan administrator.

Panelists: Carol L. Myers, Williams Parker, Sarasota, FL; Charles G. Humphrey, Law Office of Charles G. Humphrey, Andover, MA; James B. Bristol, Waller Lansden Dortch & Davis LLP, Nashville, TN; William Evans, Attorney Advisor, Office of Benefits Tax Counsel, Department of Treasury, Washington, DC (invited); Seth Tievsky, Senior Technical Advisor, IRS, Washington, DC (invited); James B. Bristol, Waller Lansden Dortch & Davis LLP, Nashville, TN

12:30PM – 1:30PM Arlington/Cabin John, Level 3B

Diversity CLE

Chair: Cathy Fung, Office of Associate Chief Counsel (Financial Institutions & Products), IRS, Washington, DC

12:30pm **Everyone, Lean In: Changing the Organizational Culture to Embrace Balance and Diversity.** This panel will discuss tried and true methods of raising awareness of diversity issues in organizations and practice groups as it applies to work-life balance for both women and men. The panelists will discuss how everyone benefits from changing the organizational culture to embrace a flexible and diverse work environment. In particular, the panel will provide insight into methods for helping individuals and organizational decision makers to identify hidden personal and professional biases in a positive way in order to effect lasting organizational change. Finally, the panel will focus on what we can do to provide opportunities for everyone and by doing so, obtain the substantial benefits of a gender-neutral and diverse organizational culture.

Moderator: Brad J. Axelrod, McGlinchey Stafford, Baton Rouge, LA

Panelists: Annette Guarisco Fildes, The ERISA Industry Committee (ERIC), Washington, DC; Lawrence B. Gibbs, Miller & Chevalier Chartered, Washington, DC; Gary Heald, Georgetown University Law Center, Washington, DC; Jaye A. Calhoun, McGlinchey Stafford PLLC, New Orleans, LA

12:30PM – 1:30PM Banneker, Level 1B

State & Local Taxes ⚖

Chair: Gregg D. Barton, Perkins Coie LLP, Seattle, WA

12:30pm **Caught in the Net – Social Networking for Judges and Lawyers from the Perspective of a Local Tax Judge.** ⚖ This presentation covers various social media platforms, their uses for promotional and other business purposes and the legal and ethical issues that arise from the expanding use of the internet in courts and law firms.

Moderator: Debra S. Herman, Hodgson Russ LLP, New York, NY

Speaker: The Honorable Glenn Newman, President, New York City Tax Commission and Tax Appeals Tribunal, New York, NY

12:45PM – 2:15PM Bulfinch/Renwick, Level 4B

Tax Compliance (Formerly Tax Shelters)

Chair: Joshua D. Odintz, Baker & McKenzie LLP, Washington, DC

12:45pm **Roundtable Discussion.** This roundtable discussion will focus on the TEFRA partnership audit and litigation procedures (sections 6221 – 6234). We will consider the history of TEFRA and the issues it was trying to solve. The roundtable will then discuss current issues that partnerships and the government face in applying TEFRA in a world of multi-tiered partnerships. The discussion will also consider proposals from Congress and the Administration, as well as suggestions for future legislation.

1:15PM – 2:00PM Roosevelt/Wilson, Level 3B

Employee Benefits

Chair: Robert A. Miller, Calfee Halter Griswold LLP, Cleveland, OH

1:15pm **Department of Labor Fireside Chat.** Informal "town hall" discussion with Department of Treasury and IRS representatives on topics of interest to attendees.

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PROGRAM SCHEDULE
FRIDAY, MAY 8

1:30PM – 5:30PM Penn Quarter B, Level 1B

Employment Taxes

Chair: Dan E. Boeskin, PwC, Washington, DC

1:30pm **Federal Employment Tax Update.** This panel will provide a federal employment tax update. The panel will discuss new administrative, regulatory, legislative developments and case law relevant to employment tax reporting and withholding.

Moderator: Thomas H. Meyerer, EY, Washington, DC

Panelists: Janine Cook, Deputy Associate Chief Counsel, TEGE, IRS, Washington, DC

2:30pm **Recent Tax Court Jurisdictional Opinions for Worker Classification Issues.** This panel will discuss Code section 7436 which gives the Tax Court jurisdiction to determine the status of a worker as either an employee or an independent contractor. The IRS created the "Notice of Determination of Worker Classification ('NDWC')," and when a taxpayer receives this Notice, the taxpayer has a "ticket to Tax Court." The Tax Court has recently taken jurisdiction in two cases over worker status issues with no NDWC being issued by the IRS: *SECC Corporation v. Commissioner*, 142 T.C. No. 12; *American Airlines Inc. v. Commissioner* 144 T.C. No. 2. The panel will consider future of Tax Court Litigation in this area.

Moderator: Chaya Kundra, Kundra & Associates PC, Rockville, MD

Panelists: Mary Corrigan Gorman, EY, Washington, DC; Mathew Cooper, EY, Washington, DC

3:30pm **The Certified Professional Employer Organization and Enactment of Section 3511: What Does it Mean for Third Party Payroll Providers.** At the end of last year, Congress enacted Code section 3511 making certain third parties that meet new certification and bonding requirements solely liable for the employment tax liabilities with respect to client employers and their work-site employees. Previously, the IRS issued finally regulations that became effective last year that provided certain third-party payroll providers can be treated as deemed agents. This panel will explore the changes to the existing rules, how these changes impacted employers, existing Professional Employer Organizations and other third-party payroll providers.

Moderator: Dan E. Boeskin, PwC, Washington, DC

Panelists: Randy Hardock, Davis & Harman LLP, Washington, DC; Kathy Mort, PwC, Pittsburgh, PA; Paul J. Carlino, Branch Chief, Employment Tax Branch 1, IRS Office of Chief Counsel, Washington, DC

4:30pm **IRS Employment Tax Refund Procedures.** This panel will discuss both the pitfalls and best practices when requesting federal employment tax refunds. The process for a refund or adjustment of overpaid employment taxes on Form 941-X, and the notice and consent requirements in order for the employer to receive a refund of employer FICA (i.e., social security and Medicare taxes) can be challenging for employers. And the procedures for requesting a refund of federal income tax withholding and FICA can be different depending on whether the claim is for adjustments within the current calendar year, or a prior calendar year. However, newly-released guidance allowing for employee consent to be requested, provided, and stored electronically will help to simplify one element of this process.

Moderator: Joseph Perera, Strasburger & Price, San Antonio, TX

Panelists: Ira Mirsky, BDO USA LLP, Bethesda, MD; Anthony Arcidiacono, EY, Iselin, NJ; Margaret Owens, IRS Office of Chief Counsel, Washington, DC

1:30PM – 2:30PM — Latrobe, Level 3B

Section CLE Committee

Chair: Katherine David, Strasburger & Price LLP, San Antonio, TX

The Section CLE Committee will discuss opportunities for the substantive Committees and other Section members to participate in the CLE programs of the Section that take place outside Committee meetings. The substantive input of members is vital to the success of these programs. Each substantive committee has a member on the Section CLE Committee, but all are welcome.

1:30PM – 3:30PM — Independence A, Level 5B

US Activities of Foreigners & Tax Treaties

Chair: Michael J. Miller, Roberts & Holland LLP, New York, NY

1:30pm **Impact of Owners, Directors, and Service Providers in the United States.** It is becoming ever more common for foreign corporations to have owners, directors, or other service providers who perform activities for the corporation while physically situated in the US. This panel will address the question of when such individuals may be considered "agents" of the corporation so as to cause it to be engaged in a US trade or business (ETB) under the Code, and will include a discussion of inbound lending activities and recently issued CCA 201501013. The panel will further address questions as to when a foreign corporation's income will be "effectively connected" with its US trade or business, when the foreign corporation will be considered to have a US permanent establishment, and how profits may be attributed to a US permanent establishment. These topics will be considered with a view towards bricks and mortar income, stateless income and changing practices in a post-BEPS world.

Moderator: William B. Sherman, Holland & Knight LLP, Ft. Lauderdale, FL

Panelists: Michael Hirschfeld, Dechert LLP, New York, NY; Professor Stephen E. Shay, Harvard Law School, Cambridge, MA; Carol P. Tello, Sutherland Asbill & Brennan LLP, Washington, DC; Elena Virgadamo, Attorney Advisor, Office of International Tax Counsel, Office of Tax Policy, Department of Treasury, Washington, DC

2:00PM – 5:00PM — Franklin Square, Level 5B

Bankruptcy and Workouts

Chair: Lee Zimet, Berdon LLP, New York, NY

2:00pm **Debt Modifications Revisited.** Several rules regarding the tax treatment of debt modifications changed in recent years. The panel will discuss the 2012 regulations defining publicly traded property and how to apply them in practice. Also, discussed will be the 2014 changes to the section 6045B regulations, resulting in a requirement to file Forms 8937 to report some debt modifications.

Panelists: Peter J. Connors, Orrick Herrington & Sutcliffe LLP, New York, NY; Lee Zimet, Berdon LLP, New York, NY

3:00pm **Hot Topics in COD Income.** The panel will focus on topics of interest relating to cancellation of indebtedness (COD) income, including whether partners can qualify for the bankruptcy exception when the partnership is in bankruptcy, the treatment of COD income realized by a single member LLC, and the recapture of ordinary income after equity is exchanged for debt.

Moderator: Professor Don Leatherman, University of Tennessee College of Law, Knoxville, TN

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Panelists: Mark Hoffenberg, KPMG LLP, Washington, DC; Benjamin M. Willis, Tax Counsel, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC

4:00pm **Mediation in Collection Matters – A Brave New World.** Over the last several years, the IRS Office of Appeals has joined the modern trend of expanding access to alternate dispute resolution to increase opportunities to resolve cases without costly litigation. Revenue Procedure 2014-63 extended mediation to certain collection matters. Join our panel of practitioners in a review of what Revenue Procedure 2014-63 offers and how the mediation process might work in collection matters.

Moderator: Bob Pope, White & Reasor PLC, Nashville, TN

Panelists: Frances D. Sheehy, Law Office of Frances D. Sheehy, Coconut Creek, FL; Mitchell I. Horowitz, Buchanan Ingersoll & Rooney PC, Tampa, FL; Scott D. Reischer, Director, Appeals - Field Operations East, IRS, Washington, DC

2:00PM – 6:00PM Constitution CDE, Level 3B

Employee Benefits

Chair: Robert A. Miller, Calfee Halter Griswold LLP, Cleveland, OH

2:00pm **Department of Labor Employee Benefits Security Administration & Pension Benefit Guaranty Corporation Updates.** This panel will discuss current EBSA and PBGC regulatory, enforcement and litigation activities.

Moderators: W. Waldan Lloyd, Callister Nebeker McCullough, Salt Lake City, UT; Harold J. Ashner, Keightley & Ashner LLP, Washington, DC

Panelists: Phyllis C. Borzi, Assistant Secretary of Labor, Employee Benefits Security Administration, Department of Labor, Washington, DC (Invited); Israel Goldowitz, Chief Counsel, Pension Benefit Guaranty Corporation, Washington, DC (Invited)

3:00pm **Department of Treasury / IRS Hot Topics.** Representatives from the Department of Treasury and IRS will review recent guidance from, and current developments at, their agencies impacting employee benefits.

Moderator: Martha L. Hutzelman, Law Office of Martha L. Hutzelman, Columbus, OH

Panelists: J. Mark Iwry, Senior Advisor to the Secretary and Deputy Assistant Secretary for Retirement and Health Policy, Department of Treasury, Washington, DC; George H. Bostick, Benefits Tax Counsel, Department of Treasury, Washington, DC; Sunita B. Lough, Commissioner, Tax Exempt and Government Entities Division, IRS, Washington, DC; Robert S. Choi, Director of Employee Plans, Tax Exempt & Government Entities Division, IRS, Washington, DC; Seth Tievsky, Senior Technical Advisor, IRS, Washington, DC; Victoria A. Judson, Associate Chief Counsel, IRS Office of Associate Chief Counsel (TEGE), Washington, DC; Stephen Tackney, Deputy Associate Chief Counsel, IRS Office of Associate Chief Counsel (TEGE), Washington, DC

4:00pm **Department of Treasury / IRS Questions and Answers.** The panelists will review and discuss selected questions and proposed answers from members of the committees comprising the Joint Committee on Employee Benefits.

Moderator: W. Waldan Lloyd, Callister Nebeker McCullough, Salt Lake City, UT

Panelists: William Evans, Attorney Advisor, Office of Benefits Tax Counsel, Department of Treasury, Washington, DC; Seth Tievsky, Senior Technical Advisor, IRS, Washington, DC; TBD

PROGRAM SCHEDULE
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5:00pm **Treasury/IRS Fireside Chat.** Informal "town hall" discussion with Department of Treasury and IRS representatives on topics of interest to attendees.

6:00pm **Corporate Counsel Corner.** Informal meeting for in-house counsel attendees.
Chairs: Jacquelyn Abbott, ExxonMobil, Houston, TX; Vicki Blanton, American Airlines, Ft. Worth, TX

6:00pm **Networking Reception.** Arlington/Cabin John, Level 3B
Sponsored by: Practical Law

2:00PM – 5:00PM Declaration B, Level 1B

State & Local Taxes ⚖

Chair: Gregg D. Barton, Perkins Coie LLP, Seattle, WA

2:00pm **'Just Add SaLT!' When and How to Consider State Tax Ethical Issues in Advising Clients.**⚖ This panel, co-sponsored by the Standards of Tax Practice and State and Local Taxes Committees, explores select ethical dilemmas when state tax issues arise while representing a client. The panel will use hypothetical problems to address the applicable rules and how they apply in realistic practice settings. Examples include expanding the scope of services, "economic substance" concerns among jurisdictions, the utility of engagement letter descriptions, the circumstances under which the duty of competence requires a SaLT specialist, how SaLT specialists may protect their firms from liability, and other practical topics.
Moderator: Phillip Pillar, Grant Thornton LLP, Philadelphia, PA
Panelists: Professor Michal Lang, Chapman University Fowler School of Law, Orange, CA; Rachel Partain, Caplin & Drysdale, New York, NY; Marilyn Wethekam, Horwood Marcus & Berk, Chicago, IL
Co-Sponsored by: Standards of Tax Practice

3:00pm **The State of State Tax Courts.** This panel of experienced tax judges will review the rise of independent state tax tribunals around the country, the legislative/political history behind their respective tribunals, a few of the more notable pending cases they are each hearing or have decided recently, and some tips on effective advocacy (do's and don'ts) by lawyers or accountants representing taxpayers before them.
Moderator: Bruce Ely, Bradley Arant Boult Cummings LLP, Birmingham, AL
Panelists: The Honorable Cade Cole, Louisiana Board of Tax Appeals, Lake Charles, LA; The Honorable Martha Wentworth, Indiana Tax Court, Indianapolis, IN; The Honorable William Thompson, Alabama Tax Tribunal, Montgomery, AL

4:00pm **Hot Topics in the State Taxation of International Operations.** The panel will address recent legislative and case law developments including state "tax haven" proposals, the appropriate federal starting point for taxable income for state purposes and other state tax considerations relevant to income generated internationally.
Moderator: Fred Ackerson, McDermott Will & Emery, Chicago, IL
Panelist: Charles Moll, Winston & Strawn LLP, San Francisco, CA; Joseph X. Donovan, Sullivan & Worcester LLP, Boston, MA

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PROGRAM SCHEDULE
FRIDAY, MAY 8

2:00PM – 5:00PM Farragut Square, Level 5B

Tax Exempt Financing

Chair: Nancy M. Lashnits, Steptoe & Johnson PLLC, Phoenix, AZ

2:00pm **Legislative, Treasury and Internal Revenue Service Update.** This panel will discuss new legislative initiatives that may affect tax exempt financing, and any new Department of Treasury and IRS regulations and other guidance in the tax-exempt bond area.

Moderator: Todd L. Cooper, Squire Patton Boggs, Cincinnati, OH

Panelists: John Cross III, Office of Tax Policy, Department of Treasury, Washington, DC (invited); Johanna Som de Cerff, Special Technical Reviewer, Branch 5, Financial Institutions & Products, IRS, Washington, DC (invited); Rebecca Harrigal, Director, Tax Exempt and Government Entities, IRS, Washington, DC (invited); Mitch Bragin, Kutak Rock, Washington, DC; Ed Oswald, Orrick Herrington, Washington, DC

3:15pm **Political Subdivision Comment Project.** Discussion of the Committee's Comments to the Department of Treasury and the IRS regarding the definition of political subdivision for purposes of sections 103, 141-150 and other tax-advantaged debt.

Moderator: Mark Norell, Sidley Austin LLP, New York, NY

Panelists: Scott Lilienthal, Hogan Lovells, Washington, DC; Vanessa Lowry, Greenberg Traurig, Philadelphia, PA; Stefano Taverna, McCall Parkhurst, Dallas, TX

3:40pm **Transportation Bonds, Private Business Use and Comment Project.** Discussion of the Committee Comments to the Department of Treasury and the IRS regarding Management Contract Safe-Harbor Rules associated with Public Private Partnership and Transportation financings.

Moderator: Carol Lew, Stradling Yocca, Newport Beach, CA

Panelists: Charles Cardall, Orrick Herrington, San Francisco, CA; Michela Daliana, Hawkins Delafield, New York, NY; Michael Thomas, Kutak Rock, Denver, CO

4:10pm **Economic Development Financings and Private Lending.** Discussion of various financing options and issues related to economic development and private lending, such as TIF Bonds, special economic development districts and combinations of tax-exempt bonds with other tax advantaged financing tools.

Moderator: Nancy Lashnits, Steptoe & Johnson, Phoenix, AZ

Panelists: David Cholst, Chapman & Cutler, Chicago, IL; Marybeth Frantz, Harris Beach PLLC, Pittsford, NY; Bruce Serchuk, Nixon Peabody LLP, Washington, DC; Vicky Tsilas, Ballard Spahr LLP, Washington, DC

2:30PM – 5:30PM Constitution A, Level 3B

Court Procedure and Practice

Chair: Mark D. Allison, Caplin & Drysdale, New York, NY

2:30pm **Important Developments.** This panel will provide an update on recent developments and remarks from the US Tax Court, IRS Chief Counsel, and Department of Treasury. It will also discuss recent cases and other current issues of particular interest to tax litigators.

Moderator: Sean M. Akins, Latham & Watkins LLP, Washington, DC

Panelists: The Honorable Michael Thornton, Chief Judge, US Tax Court, Washington, DC; Elizabeth McGee, Arnold & Porter LLP, San Francisco, CA; Alexandra Minkovich, Department of Treasury, Washington, DC (Invited); Richard G. Goldman, Branch

Chief, Office of Chief Counsel (Procedure and Administration), IRS, Washington, DC; Grover Hartt, III, Department of Justice, Dallas, TX (Invited)

3:10pm **A Look Inside an IRS Criminal Investigation: The Journey from CI Referral to Indictment - How Did We Get Here.** This panel of current and former Tax Division attorneys and Assistant US Attorneys and a former IRS CI agent & supervisor will provide an 'inside baseball' review of the progress of a criminal tax investigation from the initial IRS CI contact to the charging process and explore issues like conference strategies, proffers, and charging decisions.

Moderator: Richard Sapinski, Sills Cummis & Gross PC, Newark, NJ

Panelists: Tino Lisella, Deputy Chief, Criminal Trial Section, Western Region, Tax Division, Department of Justice, Washington, DC; Peter Hardy, Post & Schell, Philadelphia, PA; Carlos Ortiz, Blank Rome, New York, NY; David Gannaway, O'Connor Davies, Cranford, NJ

3:55pm **Transfer Pricing, International Enforcement Issues, and Other Offshore Related Hot Topics.** This panel will include discussions of country-by-country reporting, the differing views on arbitration, updates related to APAs involving certain jurisdictions, and other hot controversy topics.

Moderators: Joshua D. Odintz, Baker & McKenzie LLP, Washington, DC

Panelists: Salim Rahim, Baker & McKenzie LLP, Washington, DC; J. David Varley, IRS, Washington, DC; Paul Nolan, McCormick & Company Inc., Sparks, MD

4:45pm **Cross Border Privileges Issues.** This panel will discuss the application of the attorney-client privilege and work product doctrine in the context of cross-border and international transactions. Panelists will provide practical tips and strategies for multinationals and individuals in foreign jurisdictions to optimize the protection of legal privileges, and provide insight on how the IRS's approach to privilege issues on its growing caseload of international tax disputes is evolving.

Moderators: Peter A. Lowy, Caplin & Drysdale, New York, NY

Panelist: Nathaniel Parker, Attorney, Office of Associate Chief Counsel (International), Branch 7, IRS, Washington, DC; Kathleen Dale, General Electric Corporation, Stamford, CT; Mark D. Allison, Caplin & Drysdale, New York, NY

2:30PM – 3:30PM Potomac, Level 3B

Law Student Tax Challenge Planning Meeting

Please attend this planning meeting if you would like to volunteer to help with the Law Student Tax Challenge. Now in its 15th year, the Law Student Tax Challenge is an outstanding event and a great opportunity to get involved with the Young Lawyers Forum. This meeting will kick off our planning for the next Law Student Tax Challenge to be held at the 2016 Midyear Meeting, January 28-30, in Los Angeles, CA. We always look for enthusiastic volunteers to assist with marketing, problem drafting, judging, day-of-competition support and more. No previous experience necessary!

PROGRAM SCHEDULE
FRIDAY, MAY 8

3:00PM – 5:45PM Independence I, Level 5B

Closely Held Businesses

Chair: J. Robert Turnipseed, Armbrecht Jackson LLP, Mobile, AL

3:00pm **Buy-Sell Agreements for Closely Held Businesses.** This panel will review practical issues and tax considerations when assisting clients with succession planning and putting a buy-sell agreement in place for closely held business owners. The panel will also review valuation issues and funding mechanisms for practitioners to consider.

Panelists: Eric L. Green, Green & Sklarz LLC, Stamford, CT; Shelby L. Wilson, Berchem Moses & Devlin PC, Westport, CT; J. Robert Turnipseed, Armbrecht Jackson LLP, Mobile, AL

4:15pm **Defending Clients From the Trust Fund Recovery Penalty.** This program will provide a basic understanding of persons who may be deemed personally liable when an employer fails to meet its federal tax deposit obligations under IRC section 6672. This liability may attach not only business owners, but also employees, corporate officers, and even third party payors. Panelists will provide practical pointers in defending potential responsible persons in IRS interviews, appealing an assessment, statute of limitations and other defenses, relevant case law and the requisite willfulness required to sustain the penalty.

Moderator: Eric L. Green, Green & Sklarz LLC, Stamford, CT

Panelists: Megan L. Brackney, Kostelanetz & Fink LLP, New York, NY; Katherine M. Reinhart, Tax Division, Department of Justice, Washington, DC (invited)

3:00PM – 5:00PM Arlington/Cabin John, Level 3B

Diversity

Chair: Cathy Fung, Office of Associate Chief Counsel (Financial Institutions & Products), IRS, Washington, DC

3:00pm **Working with Your Client: Perspectives from In-House Counsel.** CLE What do your clients want and how do they want it? What is the best way to work with your client to ensure that their legal and business needs are met? A panel of current and former in-house counsel will discuss their views on best practices for working and interacting with outside counsel. The panel will also focus on diversity issues in this area.

Moderator: Professor Allen D. Madison, University of South Dakota School of Law, Vermillion, SD

Panelists: Annette Guarisco Fildes, The ERISA Industry Committee (ERIC), Washington, DC; Stephen Ianello, Consolidated Edison Company, New York, NY

Co-Sponsored by: Tax Practice Management

4:00pm **Ensuring Ethical Client Solicitations.** This panel will explore what types of activities constitute solicitation and will include a discussion of the applicable ABA Model Rules and Circular 230 § 10.30. We will discuss traditional communications, the ethical implications of modern technologies (such as LinkedIn and Twitter), and provide some best practices. This panel is designed for young lawyers looking to grow their practice, those who may be contemplating a change of employment, or anyone who wants a refresher in this thorny area.

Panelists: Karen L. Hawkins, Director, IRS Office of Professional Responsibility, Washington, DC; Matthew S. Cooper, EY, Washington, DC; Joseph A. DiRuzzo, III,

Fuerst Ittleman David & Joseph, Miami, FL; Rachel L. Partain, Caplin & Drysdale Chtd., New York, NY
Co-Sponsored by: Standards of Tax Practice

3:00PM – 5:45PM Independence FG, Level 5B
Financial Transactions 📼
Chair: Eileen Marshall, Wilson Sonsini Goodrich & Rosati PC, Washington, DC

3:00pm **Five Households, All Alike in Dignity: Resolving Differing Views of Tax Law within the IRS Office of Chief Counsel.** As a formal matter, the IRS Office of Chief Counsel speaks with a single voice. In practice, though, each Associate Chief Counsel's Office has its own body of law to administer, and the different offices sometimes view the same transaction from different perspectives. This panel will explore some of the tensions that arise when this happens.
Moderator: Matthew A. Stevens, EY, Washington, DC
Panelists: Richard G. Larkins, EY, Washington, DC; Erik H. Corwin, Deputy Chief Counsel (Technical), Office of Chief Counsel, IRS, Washington, DC; Helen M. Hubbard, Associate Chief Counsel (Financial Institutions and Products), Office of Chief Counsel, IRS, Washington, DC

4:00pm **Related Party Financing: Current Law and Policy Considerations.** Related party financing is common in the capital structure of multinationals. Various features of current law limit the amount of intercompany debt and the interest thereon, such as thin capitalization and other debt/equity factors, transfer pricing and the earnings stripping rules. The OECD's BEPS Action 4 also is developing recommendations to prevent base erosion through related-party financing. This panel will analyze the limitations under current law and explore whether tighter restrictions might be sensible as a policy matter.
Moderator: David C. Garlock, EY, Washington, DC
Panelists: Steven Rosenthal, Urban Institute, Washington, DC; Danielle Rolfes, International Tax Counsel (Tax Policy), Department of Treasury, Washington, DC

5:00pm **Current Developments and Issues.** This panel will focus on current developments and practice issues in financial transactions and products.
Moderator: Rebecca E. Lee, PwC, San Francisco, CA
Panelists: Helen M. Hubbard, Acting Associate Chief Counsel (Financial Institutions and Products), Office of Chief Counsel, IRS, Washington, DC; David Silber, Acting Deputy Associate Chief Counsel (Financial Institutions and Products), Office of Chief Counsel, IRS, Washington, DC; William E. Blanchard, Senior Technician Reviewer (Financial Institutions and Products), Office of Chief Counsel, IRS, Washington, DC; Diana A. Imholtz, Branch Chief (Financial Institutions and Products), Office of Chief Counsel, IRS, Washington, DC; Erika W. Nijenhuis, Cleary Gottlieb Steen and Hamilton LLP, New York, NY

PROGRAM SCHEDULE

FRIDAY, MAY 8

3:00PM – 5:45PM Lafayette Park, Level 5B

Insurance Companies

Chair: Bryan W. Keene, Davis & Harman LLP, Washington, DC

3:00pm **Health Insurance Update.** This panel will discuss current and pending developments involving health insurance arrangements under the Affordable Care Act, including the upcoming excise tax on high-cost "Cadillac" plans, the potential implications of the Supreme Court's forthcoming decision in *King v. Burwell*, and more.

Moderator: Lori A. Robbins, KPMG LLP, Washington, DC

Panelist: Thomas Wilder, America's Health Insurance Plans, Washington, DC; Catherine Livingston, Jones Day, Washington, DC; Robert Neis, Deputy Benefits Tax Counsel, Office of Benefits Tax Counsel, Department of Treasury, Washington, DC; Rebecca Baxter, Office of Associate Chief Counsel, IRS, Washington, DC

3:55pm **Legislative Update.** This panel will provide an update on current and future legislative proposals and developments affecting the federal income taxation of life insurance companies and the products they issue, including the prospects for tax reform in the current and future Congresses.

Moderator: Ann B. Cammack, EY, Washington, DC

Panelists: Alan Lee, Tax Counsel, House Ways and Means Committee (Minority), Washington, DC (Invited); Preston Rutledge, Tax and Benefits Counsel, Senate Finance Committee (Majority), Washington, DC (Invited)

4:55pm **Captive Insurance Update.** There has been a tremendous amount of activity involving captive insurance arrangements over the last year. This panel will discuss many of those developments, including the Tax Court decisions in *Rent-A-Center* and *Securitas*, the inclusion of "guidance on captive insurance companies" on the IRS/Treasury Priority Guidance Plan, the IRS including certain captive arrangements electing taxation under section 831(b) on its annual "dirty dozen" list of abusive tax shelters, and recent legislative proposals involving small captive arrangements.

Moderator: Charles J. Lavelle, Bingham Greenebaum Doll LLP, Louisville, KY

Panelist: Elizabeth Erickson, McDermott Will & Emery, Washington, DC; Alexis MacIvor, Office of Associate Chief Counsel, IRS, Washington, DC

3:00PM – 5:45PM Independence BCDE, Level 5B

Real Estate

Chair: L. Wayne Pressgrove, Jr., King & Spalding LLP, Atlanta, GA

3:00pm **Legislative Update.** This panel will provide an update on current and future legislative proposals and developments affecting the federal income taxation of real estate.

Moderator: Ryan P. McCormick, The Real Estate Roundtable, Washington, DC

Panelists: Mark Prater, Chief Tax Counsel, US Senate Committee on Finance, Washington, DC; George Callas, Chief Tax Counsel, House Ways and Means Committee, Washington, DC

3:55pm **FIRPTA, Section 892 & REITs.** This panel will cover FIRPTA issues, including foreign investment in US real estate through partnerships, corporations and REITs. The panel will also consider section 892 issues.

Moderator: Professor Alan Appel, New York Law School, New York, NY

Panelists: Summer Ayers LePree, Bilzin Sumberg Baena Price & Axelrod LLP, Miami, FL; Philip R. Hirschfeld, Ruchelman PLLC, New York, NY; Michael J. Miller,

Roberts & Holland LLP, New York, NY; Charles Besecky, Branch Chief for Branch 4, IRS Office of the Associate Chief Counsel – International, Washington, DC; Julia Tonkovich, Attorney Advisor, Department of Treasury, Washington, DC

4:50pm **Motivating the Real Estate Deal and Fund Team.** This panel will discuss the business and tax issues related to the incentives and compensation being offered in real estate deals and by real estate funds, including phantom equity rights, profits interests, management fees, and compensation strategies.

Moderator: Eliot L. Kaplan, Squire Patton Boggs, Phoenix, AZ

Panelists: Elizabeth E. Drigotas, Deloitte Tax LLP, Washington, DC; Steven R. Schneider, Goulston & Storrs PC, Washington, DC

3:00PM – 4:00PM Washington Boardroom, Level 3B

Sponsorships

Chair: Leslie E. Grodd, Halloran & Sage LLP, Westport, CT

3:00PM – 5:45PM Tiber Creek, Level 1B

Tax Accounting

Chair: Colleen M. O'Connor, KPMG LLP, Washington, DC

3:00pm **Section 199 – Recent Developments and Hot Topics.** This panel will address several pieces of recently issued guidance under section 199 affecting computer software, qualified films, and cost allocations. In addition, the panel will address forthcoming regulations that are expected to be issued prior to this panel that will address recent legislative changes to section 199 as well as a variety of hot topic issues taxpayers and IRS frequently encounter.

Moderator: George Manousos, PwC, Washington, DC

Panelists: Beth Benko, KPMG LLP, Washington, DC; Ken Beck, Taxation Specialist, Office of Tax Policy, Department of Treasury, Washington, DC; Paul Handleman, Branch Chief, Branch 5, Passthroughs and Special Industries, IRS, Washington, DC; James Holmes, Attorney, Branch 5, Passthroughs and Special Industries, IRS, Washington, DC

3:45pm **Accounting Methods Considerations for Partnerships.** This panel will discuss various accounting methods issues that taxpayers and practitioners may encounter as a result of a partnership transactions. In particular, this panel will discuss the differences between technical and actual terminations and how accounting methods may be affected by each type transaction. This panel will also discuss how accounting methods are affected by section 721 contributions, as well as other accounting methods issues specific to partnerships.

Moderator: Heather Harman, EY, Washington, DC

Panelists: Kate Abdoo, McGladrey LLP, Washington, DC; Jeanne Ross, Senior Level Counsel, Passthroughs and Special Industries, IRS, Washington, DC; Roy Hirshhorn, Branch Chief, Branch 6, Income Tax and Accounting, IRS, Washington, DC; Karla Meola, Special Counsel, Branch 7, Income Tax and Accounting, IRS, Washington, DC

4:25pm **Current Developments.** This panel will review recent developments in the area of tax accounting since the Section of Taxation meeting held in Houston, TX in January. The panel will also discuss ongoing projects and anticipated guidance, with commentary and input from our guests from the IRS and Department of Treasury.

Moderator: Catherine Brandt, EY, Indianapolis, IN

Panelists: A.J. Schiavone, Crowe Horwath, Columbus, OH; Andrew J. Keyso, Associate Chief Counsel, Income Tax and Accounting, IRS, Washington, DC; Ken Beck, Taxation Specialist, Office of Tax Policy, Department of Treasury, Washington, DC

5:00pm **Tangible Property Regulations Guidance Update.** This panel will discuss recent guidance regarding the application of the Tangible Property Regulations. Specific topics to be discussed include: (1) special rules for small business taxpayers under Rev. Proc. 2015-20; (2) SB/SE FAQs regarding the application of the regulations; (3) the impact of transition rules under Rev. Proc. 2015-13; and (4) a status update on Industry Issue Resolution projects.

Moderator: Christian Wood, McGladrey LLP, Washington, DC

Panelists: Richard Shevak, CohnReznick, New York, NY; Scott Dinwiddie, Special Counsel to the Associate Chief Counsel, Income Tax & Accounting, IRS, Washington, DC; Kathleen Reed, Branch Chief, Branch 7, Income Tax and Accounting, IRS, Washington, DC; Merrill Feldstein, Special Counsel, Branch 3, Income Tax and Accounting, IRS, Washington, DC

3:00PM – 4:30PM Roosevelt/Wilson, Level 3B

Teaching Taxation

Chair: Professor Danshera Cords, University of Pittsburgh, Pittsburgh, PA

3:00pm **Changing the Conversation About Tax Reform: Dynamic Scoring.** With a change in the Congressional balance, talk has turned again to tax reform. Although many are skeptical that major tax reform will take place, it is clear there will be changes. This panel will discuss some of the ways in which the discussion may change, both linguistically and practically. What is dynamic scoring? In practice how would it work? What changes would it bring to the legislative process? These experts in the field will answer these questions and more.

Moderator: Professor Tracy A. Kaye, Seton Hall University School of Law, Newark, NJ

Panelists: Thomas Barthold, Chief of Staff, Joint Committee on Taxation, Washington, DC; Jane Gravelle, Senior Specialist in Economic Policy, Congressional Research Service, Washington, DC; G. William Hoagland, Senior Vice President, Bipartisan Policy Center, Washington, DC

Co-Sponsored by: Tax Policy and Simplification

3:30PM – 5:30PM Independence A, Level 5B

Foreign Activities of US Taxpayers, Foreign Lawyers Forum, Transfer Pricing, and US Activities of Foreigners and Tax Treaties

3:30pm **Joint Current International Developments Panel.** The joint international current developments panel will be provide a provocative discussion of current events in outbound and inbound international taxation, transfer pricing, and foreign tax issues.

Moderator: Paul Schmidt, Baker & Hostetler LLP, Washington, DC

Panelists: Professor Karen B. Brown, The George Washington University Law School, Washington, DC; Libin Zhang, Roberts & Holland LLP, New York, NY; Laura

Gould, King & Wood Mallesons LLP, London, UK; John Breen, Skadden Arps Slate Meagher & Flom LLP, Washington, DC; Anne Devereaux, Deputy Associate Chief Counsel (Field and Litigation), IRS Office of Associate Chief Counsel – International, Washington, DC; Brenda Zent, Special Advisor on International Taxation, Department of Treasury – Office of International Tax Counsel, Washington, DC

4:00PM – 5:00PM Latrobe, Level 3B
Publications *(Executive Session)*
Chair: Professor Alice Abreu, Temple University, Beasley School of Law, Philadelphia, PA

4:00PM – 5:30PM Penn Quarter A, Level 1B
Young Lawyers Forum ★
Chair: Ivan H. Golden, Schiff Hardin LLP, Chicago, IL

4:00pm **Hot Topics in International Tax.** ★ This panel will address several recent developments in international tax, with a focus on issues that young lawyers and new practitioners are likely to encounter in practice. The panelists will discuss a variety of topics, including BEPS action plans and their impact on cross-border tax structuring, outbound planning and compliance issues, and civil and criminal tax issues for US taxpayers with foreign assets or accounts.
Panelists: Anisa Afshar, PwC, New York, NY; Travis A. Greaves, Caplin & Drysdale, Washington, DC; Severiano Ortiz, Holland & Knight LLP, Chicago, IL

4:30PM – 5:00PM Potomac, Level 3B
Companion Event Committee
Chair: Leslie E. Grodd, Halloran & Sage LLP, Westport, CT

5:30PM – 6:30PM Grand Foyer, Level 1B
Diversity & Young Lawyers Forum Networking Reception ★

5:45PM – 6:30PM Washington Boardroom, Level 3B
Foreign Activities of US Taxpayers Business Meeting

5:45PM – 6:30PM Roosevelt/Wilson, Level 3B
Foreign Lawyers Forum Business Meeting

5:45PM – 6:30PM Bulfinch/Renwich, Level 4B
Transfer Pricing Business Meeting

5:45PM – 6:30PM Latrobe, Level 3B
US Activities of Foreigners & Tax Treaties Business Meeting

6:30PM – 8:00PM National Portrait Gallery, Kogod Courtyard
Section Reception ★ *(Ticketed Event)*
Enjoy great food and drinks with your colleagues and friends. Tickets can be purchased at registration until 6:30pm on Friday. Tickets will not be available at the door.

8:00PM – 10:00PM
Joint International Committees Dinner *(Reservation Required)*

= Taped ★ = Young Lawyers Program = Ethics Credits Requested = No CLE Credit

PROGRAM SCHEDULE
SATURDAY, MAY 9

7:00AM – 4:00PM Grand Foyer, Level 1B
Hospitality Center *(Complimentary)*
Continental breakfast will be served in the morning. Snacks, coffee, sodas and water will be available in the afternoon.

7:00AM – 8:30AM Declaration, Level 1B
Tax Practice Management
Chair: Robb A. Longman, Longman & Van Grack, LLC, Bethesda, MD

7:00am **Managing your Malpractice Risk: Ways to Reduce your Claims and Costs.** This panel will discuss ways to reduce the risk of malpractice claims. It will focus on retainers, client termination letters and dealing with issues that arise in every day practice. It will also provide hypothetical situations and a way to resolve them without malpractice issues.
Panelists: Robb A. Longman, Longman & Van Grack LLC, Bethesda, MD; Jeffrey K. Gonya, Venable LLP, Baltimore, MD

7:15AM – 8:30AM Constitution B, Level 3B
Real Estate, Partnerships & LLCs and S Corporations "Shop Talking" Breakfast
(Ticketed Event)
Members of the Real Estate, Partnerships & LLCs and S Corporations Committees will gather for the traditional "open mic" breakfast to share ideas and war stories and to seek input on technical issues.

7:30AM – 8:30AM Independence A, Level 5B
Incoming Committee Chairs, Vice-Chairs, Officers & Council Breakfast *(Executive Session)*

7:45AM – 9:15AM Burnham, Level 3B
Court Procedure & Practice Officers and Subcommittee Chairs Breakfast *(Ticketed Event)*

8:30AM – 11:30AM Constitution A, Level 3B
Employee Benefits
Chair: Robert A. Miller, Calfee Halter Griswold LLP, Cleveland, OH

8:30am **Affordable Care Act After 5 Years.** This panel will take a policy retrospective and prospective look at the Affordable Care Act (ACA) in terms of the evolution of health care coverage for employees offered by their employers. Starting with the types of employer-provided health coverage that existed back in 2010 and seeing the changes made over the past five years, the panel will discuss how the excise tax on high cost plans (the Cadillac tax) that goes into effect in 2018, and well as other ACA provisions, will impact employer-sponsored health plans in the future.
Moderator: Professor Kathryn J. Kennedy, The John Marshall Law School, Chicago, IL
Panelists: Phyllis Borzi, Assistant Secretary for the Employee Benefits Security Administration, Department of Labor, Washington, DC (Invited); J. Mark Iwry, Senior Advisor to the Secretary and Deputy Assistant Secretary for Retirement and Health Policy, Department of Treasury, Washington, DC (Invited); Professor Bradley Herring, The Johns Hopkins Bloomberg School of Public Health, Baltimore, MD; Linda Mendel, Vorys Sater Seymour & Pease LLP, Columbus, OH; Helen Morrison, EY, Washington, DC

9:30am **Qualified Plan Testing in Controlled Group and Affiliated Service Group Environments.** This panel will review minimum coverage testing and nondiscrimination testing issues that arise in controlled group and affiliated service group environments. The panel will also review and discuss controlled groups that include for-profit and tax-exempt entities and the application of the qualified separate line of business rules.

Moderator: Bret Hamlin, Hill Ward Henderson, Tampa, FL

Panelists: Bruce Barth, Robinson & Cole LLP, Hartford, CT; Erin Turley, K&L Gates LLP, Dallas, TX; Michael Weddell, Towers Watson, Southfield, MI

10:30am **Fiduciary Issues and Data Privacy.** As employers and third party administrators store more information electronically, protecting the privacy of employee participants' personal information has become more challenging. Breaches of data privacy fill the headlines, but no one ever really discusses the complexity of the issues faced by employers in managing such breaches. This panel will address privacy and data security issues relevant to ERISA fiduciaries, including obligations to respond and investigate a data breach, duties to notify under HIPAA and related state data breach notification laws, the practicalities of responding to employee concerns and data privacy considerations when selecting and contracting with vendors.

Moderator: Susan A. Wetzel, Haynes and Boone LLP, Dallas, TX

Panelists: Andrew C. Liazos, McDermott Will & Emery, Boston, MA; Ann Killilea, McDermott Will & Emery, Boston, MA; Julie Burbank, Chevron Corporation, San Ramon, CA

8:30AM – 11:30AM Bulfinch/Renwick, Level 3B

Fiduciary Income Tax

Chair: Lewis J. Saret, Law Office of Lewis J. Saret, Washington, DC

8:30am **Current Developments.** Irene Estrada and Jeff Gonya will review current developments in fiduciary income tax, and Cathy Hughes and Adrienne Mikolashek will update the committee on developments with the Treasury and the Service.

Panelist: Catherine V. Hughes, Office of Tax Policy, Department of Treasury, Washington, DC; Irene C. Estrada, KPMG LLP, Washington, DC; Jeffrey K. Gonya, Venable LLP, Baltimore, MD; Adrienne Mikolashek, Attorney, Office of the Associate Chief Counsel (Passthroughs and Special Industries), IRS, Washington, DC

9:15am **State Fiduciary Law Update.** This panel will provide an update of fiduciary law developments from a state law perspective, leading off with the changes implemented in the state of New York.

Panelists: Stacey Delich-Gould, Venable LLP, New York, NY; Brandon A. S. Ross, Loeb & Loeb LLP, Washington, DC; David A. Berek, Horwood Marcus & Berk Chartered, Chicago, IL; George D. Karibjanian, Proskauer Rose LLP, Boca Raton, FL

9:40am **Including Capital Gains in DNI.** This Program will review of the operation of the distributable net income ("DNI") rules and planning opportunities for treating short-term capital gains and/or long term capital gains as part of DNI. The discussion will also focus on drafting techniques to minimize the 3.8% tax on net investment income and to carry out capital gains as part of DNI.

Panelist: Gregory V. Gadarian, Gadarian & Cacy PLLC, Tucson, AZ

= Taped ★ = Young Lawyers Program = Ethics Credits Requested = No CLE Credit

10:35am **Charitable Contribution Deductions for Estates and Trusts under Section 642(c): Timing, Traps and Techniques.** This program will begin with a brief overview of the mechanics and requirements for the income tax charitable contribution deduction. It then will explore, in depth, the unique overlay and application of section 642(c) to what can be deducted and when by decedent's estates and taxable trusts. The programs will conclude with a review of particularly advantageous planning techniques for Charitable Lead Trusts and Income in Respect of a Decedent.
Panelist: Edward Jay Beckwith, BakerHostetler LLP, Washington, DC

8:30AM – 10:30AM Arlington/Cabin John, Level 3B

LLCs and LLPs Subcommittee of Partnerships & LLCs CLE

Chair: J. Leigh Griffith, Waller Lansden Dortch & Davis LLP, Nashville, TN

8:30am **Partnership Divisions: Opportunity or Nightmare.** CLE This presentation will give an overview of the partnership division regulations and discuss the traps for the unwary, including the potential for disguised sales, mixing bowl transactions and gain from deemed hot asset exchanges.
Panelist: Eliot L. Kaplan, Squire Patton Boggs (US) LLP, Phoenix, AZ

9:30am **Dual Status Issue.** CLE This panel will focus on the dual status issue concerning partners and whether they can also have the status of an employee.

8:30AM – 11:30AM Farragut/Lafayette, Level 5B

Pro Bono & Tax Clinics

Chair: Andrew R. Roberson, McDermott Will & Emery LLP, Chicago, IL

8:30am **Update from Tax Court.** Chief Special Trial Judge Peter Panuthos will bring to the committee his annual update on cases, rules and administrative practices at the Tax Court that impact practitioners representing low-income taxpayers.
Panelist: The Honorable Peter J. Panuthos, Chief Special Trial Judge, US Tax Court, Washington, DC

9:00am **Handling Cases With Potential Criminal Issues.** Many tax cases have potential criminal aspects, including failure to file and omission of amounts or sources of income. This panel will discuss the criminal tax regime and the legal, strategy, and ethical issues that can arise in representing clients who have crossed the often blurry line between civil and criminal tax exposure.
Moderator: Patrick W. Thomas, Neighborhood Christian Legal Clinic, Indianapolis, IN
Panelists: Miriam Fisher, Latham & Watkins LLP, Washington, DC; Professor Scott Schumacher, University of Washington School of Law, Seattle, WA; Mark E. Matthews, Caplin & Drysdale, Washington, DC

10:00am **W-2 and Worker Classification Issues.** Taxpayer representatives must be prepared for a potential increase in worker classification disputes as implementation of Employer Shared Responsibility is phased in starting this year. This panel will identify common worker classification and W-2 issues encountered by low-income taxpayers, with a particular focus on ITIN filers, and discuss options and strategies available to affected taxpayers and their representatives.
Moderator: Lany Villalobos, Philadelphia Legal Assistance, Philadelphia, PA

Panelists: Laura Baek, Senior Attorney Advisor, Taxpayer Advocate Service, IRS, Washington, DC; Mary Corrigan Gorman, EY, Washington, DC; Anna C. Tavis, South Brooklyn Legal Services, Brooklyn, NY

11:00am **Hot Topics.** This panel will raise common recurring issues seen by practitioners in representing low-income taxpayers. Issues will include erroneous assessments in Tax Court cases, tax scams, power of attorney questions, recent civil penalty guidance, and other items of interest.

Panelists: Andrew VanSingel, Prairie State Legal Services Inc., Wheaton, IL; Molly Recar, Prairie State Legal Services Inc., Wheaton, IL

8:30AM – 11:30AM Independence FG, Level 5B

Sales, Exchanges & Basis ★

Chair: Mary B. Foster, 1031 Services Inc., Bellevue, WA

8:30am **Current Developments in Sales, Exchanges & Basis.** ★ Panelists review recent case law and guidance on traditional sale, exchange, and basis issues.

Panelists: Professor Erik Jensen, Case Western Reserve University, Cleveland, OH; David Shechtman, Drinker Biddle & Reath LLP, Philadelphia, PA

9:00am **The Long and the Short of the Effects of *Long* on Long Term Capital Gains.** The Eleventh Circuit's 2014 decision in *Long*, reversing the Tax Court, allowed a developer long term capital gain on the sale of rights to proceeds from a lawsuit seeking specific performance of a contract to buy land for condominium development. This panel will discuss *Long* in the context of prior case law concerning dispositions of contracts and the statutory rules of sections 1234 and 1234A concerning the disposition of certain contractual rights to acquire property.

Moderator: Professor Bradley T. Borden, Brooklyn Law School, Brooklyn, NY

Panelists: Professor Danshera Cords, University of Pittsburgh School of Law, Pittsburgh, PA; Sandy Irving, Senior Counsel, IRS Associate Chief Counsel (Income Tax & Accounting), Washington, DC; Professor Calvin H. Johnson, The University of Texas School of Law, Austin, TX; Charles H. Kim, Attorney, IRS Associate Chief Counsel (Income Tax & Accounting), Washington, DC; Kate Kraus, EY, Los Angeles, CA

10:00am **Taxation of Fees for Distribution Rights and Franchises.** Companies earning fees from their distributors and franchisees represent a large portion of the US economy. This panel will review the issues of what determines whether their fee income, derived from either fixed fees upon granting the rights or contingent fees based upon the distributor's or franchisee's sales, is ordinary income or capital gain. Related topics, such as basis recovery, the personal holding company tax, the net investment income tax, and taxation of advertising funds, will also be discussed.

Moderator: Alan S. Lederman, Gunster, Ft. Lauderdale, FL

Panelists: Matthew E. Rappaport, Karol & Sosnik PC, Garden City, NY; Mark E. Wilensky, Meltzer Lippe Goldstein & Breitstone LLP, Mineola, NY

10:45am **A Critical Look at "Deferred Sales Trusts."** Some promoters argue that by selling appreciated property for an installment note to a trust that, in turn, sells the property for cash to an unrelated buyer, the seller can defer tax on the trust's cash resale price

until the trust makes payments on the note to the seller. This is also promoted as a solution for failed 1031 exchanges. The panel will consider possible IRS attacks on such arrangements.

Moderator: Professor Roberta F. Mann, University of Oregon School of Law, Eugene, OR

Panelists: Stephen M. Breitstone, Meltzer Lippe Goldstein & Breitstone LLP, Mineola, NY; Vivek A. Chandrasekhar, Roberts & Holland, New York, NY; E. John Wagner, II, Williams Parker Harrison Dietz & Getzen, Sarasota, FL; Jerome M. Hesch, Berger Singerman, Miami, FL

8:30AM – 10:30AM — Roosevelt/Wilson, Level 3B

State & Local Taxes Practitioner's Roundtable *(Executive Session)*

Moderator: Leah Robinson, Sutherland Asbill & Brennan LLP, New York, NY

8:45AM – 11:45AM — Constitution CDE, Level 3B

Civil and Criminal Tax Penalties

Chair: Josh O. Ungerman, Meadows Collier Reed Cousins Crouch & Ungerman LLP, Dallas, TX

8:45am **Reports of Subcommittees on Important Developments.** Important Developments (Criminal) - Jason Freeman, Meadows Collier Reed Cousins Crouch & Ungerman LLP, Dallas, TX; Important Developments (Civil) – Troy Olsen, FedEx Corp., Memphis, TN; Sara Neill, Capes Sokol Goodman Sarachan PC, St. Louis, MO; IRS Investigations and Practices – Michael A. Villa, Jr., Meadows Collier Reed Cousins Crouch & Ungerman LLP, Dallas, TX; Monetary Violations and Forfeitures – Peter Hardy, Post & Schell PC, Philadelphia, PA; Loren Washburn, Clyde Snow and Sessions, Salt Lake City, UT; Sentencing Guidelines – Matt Hicks, Caplin & Drysdale, Washington, DC; Jeffrey A. Neiman, Law Offices of Jeffrey A. Neiman, Ft. Lauderdale, FL; International Tax Enforcement – Bruce Zagaris, Berliner Corcoran & Rowe LLP, Washington, DC; Joseph M. Erwin, Dallas, TX; Attorney-Client and Constitutional Privileges – William P. Davis, Calvo Fisher & Jacob LLP, Dallas, TX; Brian McManus, Latham & Watkins LLP, Washington, DC

9:20am **Internal Revenue Service, Criminal Investigation – Update.**
Panelist: Rebecca A. Sparkman, Director, Operations, Policy & Support, Criminal Investigation, IRS, Washington, DC

9:45am **Department of Justice, Tax Division – Update.**
Panelist: Diana L. Erbsen, Deputy Assistant Attorney General for Appellate and Review, Tax Division, Department of Justice, Washington, DC

10:10am **Day of Reckoning – An Update on Offshore Appeals.** The civil willful FBAR penalty cases have made their way to the IRS Office of Appeals. This panel will explore the procedural issues of taking a civil willful FBAR case to IRS Appeals along with the expected IRS arguments and taxpayer defenses.
Moderator: Elizabeth A. Copeland, Strasburger & Price LLP, San Antonio, TX
Panelists: Mary E. Wood, Meadows Collier Reed Cousins Crouch & Ungerman LLP, Dallas, TX

10:55am **Money Laundering – IRS Seizure and Forfeiture Post October 25, 2014.** On October 25, 2104 Chief of IRS CI Richard Weber announced that IRS CI will no longer pursue the seizure and forfeiture of funds associated solely with "legal source"

structuring cases unless there are exceptional circumstances. This panel will focus on the new methods and scenarios in which the IRS is expected to seize and forfeit funds of a taxpayer and even potentially of an attorney.

Moderator: Ian Comisky, Blank Rome LLP, Philadelphia, PA

Panelists: Michael A. Villa, Jr., Meadows Collier Reed Cousins Crouch & Ungerman LLP, Dallas, TX; Peter Hardy, Post & Schell PC, Philadelphia, PA; Peter Alvarado, Deloitte, Washington, DC

8:45AM – 11:45AM Independence BCD, Level 5B

Corporate Tax

Chair: Julie Hogan Rodgers, WilmerHale LLP, Boston, MA

8:45am **Current Developments.** This panel will review the important recent developments in corporate tax.

Moderator: Devon Bodoh, KPMG LLP, Washington, DC

Panelists: Andrew Morris, Linklaters LLP, New York, NY; Alison Burns, Acting Associate Chief Counsel (Corporate), IRS, Washington, DC; Lisa Fuller, Acting Deputy Associate Chief Counsel (Corporate), IRS, Washington, DC

9:15am **It's All About That Basis.** This panel will review the issues and uncertainties related to the determination and recovery of basis, explore proposals to address the issues, and discuss the role of E&P in formulating future guidance.

Moderator: Karen Gilbreath Sowell, EY, Washington, DC

Panelists: Rebecca O. Burch, EY, Washington, DC; Gordon Warnke, Linklaters LLP, New York, NY; Michael Schler, Cravath Swaine & Moore LLP, New York, NY; Krishna P. Vallabhaneni, Office of Tax Legislative Counsel, Department of the Treasury, Washington, DC; Kevin Jacobs, Office of Associate Chief Counsel (Corporate), IRS, Washington, DC

10:30am **Not Free From Doubt? – Corporate Tax Opinions.** This panel will discuss SEC Staff Legal Bulletin No. 19, its application to different corporate transactions and its effect on tax opinions and disclosure. The panel will also discuss other aspects of opinion practice, including the impact of FIN 48 and the various functions of tax opinions.

Moderator: Rachel D. Kleinberg, Davis Polk & Wardwell LLP, Menlo Park, CA

Panelists: Thomas Greenaway, KPMG LLP, Boston, MA; Eileen Marshall, Wilson Sonsini Goodrich & Rosati, Washington, DC; Joan L. Schumaker, EY, New York, NY; Barry N. Summer, Associate Director, Division of Corporate Finance, US Securities and Exchange Commission, Washington, DC

9:00AM – 11:30AM Independence HI, Level 5B

Foreign Lawyers Forum

Chair: Thierry Boitelle, Bonnard Lawson, Geneva, Switzerland

9:00am **General Anti-Abuse Rules (GAAR) Rapidly Gaining Territory in Double Tax Treaties.** More and more jurisdictions are introducing general-anti abuse rules (GAAR's) in their double tax treaties, other international tax agreements or in domestic law overriding the treaties. This panel will provide an update on the latest anti-abuse developments in the field of double tax treaties. Special attention will be given to the GAAR's introduced in Canada, China, Denmark and India.

Moderator: Brian Davis, Ivins Phillips & Barker, Washington, DC

= Taped ★ = Young Lawyers Program = Ethics Credits Requested = No CLE Credit

Panelists: Zhao Yan, King & Wood Mallesons, Beijing, China; Francesco Gucciardo, Aird & Berlis, Toronto, ON; Gagan Kumar, Krishnomics Legal, New Delhi, India; Anders Oreby Hansen, Bech-Bruun, Copenhagen, Denmark; Danielle Rolfes, International Tax Counsel, Department of Treasury, Washington, DC

10:15am **Lux Tax Leaks Become EU Tax Leaks: 2016 Automatic Exchange of Tax Rulings in the EU.** The EU commission proposes automatic exchange of advance pricing agreements (APA's) and advance tax rulings (ATR's) already as of 1 January 2016. This panel will discuss the implications for multinational companies and may also touch upon the most recent EU State Aid developments, e.g. with respect to the Irish, Netherlands, Belgian and Luxembourg ruling practices.

Moderator: Brian Davis, Ivins Phillips & Barker, Washington, DC

Panelists: Willem Bongaerts, Bird & Bird, The Hague, the Netherlands; Michel Collet, CMS Bureau Francis Lefebvre, Paris, France; James Somerville, A&L Goodbody, Dublin, Ireland; Thierry Lesage, Arendt & Medernach, Luxembourg

10:00AM – 11:00AM Constitution B, Level 3B

Employment Taxes & Exempt Organizations Joint Panel

Employment Taxes Chair: Dan E. Boeskin, PwC, Washington, DC

Exempt Organizations Chair: Robert A. Wexler, Adler & Colvin, San Francisco, CA

10:00am **Exempt Organizations, Employment Taxes and Information Reporting.** This panel will explore employment tax and information reporting required for universities and colleges relative to their student population, such as Forms W-2, 1099-MISC, 1042 and Form 1098-T, and discuss current challenges faced by educational institutions. The panelists will consider recent penalty notices for missing or incorrect taxpayer identification numbers and the steps taxpayers should take to limit exposure, including how to assess payments made to US persons and non-resident aliens.

Moderator: Megan Marlin, PwC, Washington, DC

Panelists: Janine Cook, Deputy Associate Chief Counsel, TEGE, IRS, Washington, DC; Ira Mirsky, BDO USA LLP, Bethesda, MD

10:30AM – 11:00AM Roosevelt/Wilson, Level 3B

State & Local Taxes: Publication Subcommittees CLE

Those persons responsible for *The Tax Lawyer – The State and Local Tax Edition*, *Sales & Use Tax Deskbook*, *Property Tax Deskbook*, and committee webpage and listserv will meet to discuss the status of their work.

Panelists: Gregg D. Barton, Perkins Coie LLP, Seattle WA; Jeffrey Reed, Mayer Brown, New York, NY; Matthew Hedstrom, Alston & Bird, LLP, New York, NY; Robert L. Mahon, Perkins Coie LLP, Seattle WA; Scott E. Sebastian, MassMutual, Springfield, MA; Jeffrey J. McNaught, Lindquist & Vennum PLLP, Minneapolis, MN; Timothy R. Van Valen, Brownstein Hyatt Farber Schreck LLP, Albuquerque, NM; Kyle Wingfield, Williams Mullen, Richmond, VA

11:00AM – 12:00PM Roosevelt/Wilson, Level 3B

State and Local Taxes Vice-Chairs' Planning Meeting CLE *(Executive Session)*

Chair: Gregg D. Barton, Perkins Coie LLP, Seattle WA

12:00PM – 1:30PM Independence A, Level 5B

Section Luncheon & Plenary Session *(Ticketed Event)*
Armando Gomez, Section Chair, Presiding

Certificate Presentation
Recognition of the 2014-2015 Section of Taxation Chair, Armando Gomez, Skadden Arps Slate Meagher & Flom LLP, Washington, DC

Chair's Report to the Section
Armando Gomez, Section Chair

PRESENTATION
2015 Distinguished Service Award Recipient

Stefan F. Tucker will be recognized for his distinguished career and his many contributions to the tax profession with the 2015 Distinguished Service Award.

A week after graduating from law school, Stef went to work as a law clerk for Judge Clarence Opper at the US Tax Court. After his clerkship, Stef went to work as an associate with the Arent Fox law firm in Washington. For a while, Stef was the only associate in its business group and, thus, got exposed to several related areas of the law, including tax, estate planning, mergers and acquisitions, real estate, and partnerships.

After ten years, first as an associate and then as a partner, Stef decided that Arent Fox had grown too large (from 23 lawyers when he arrived to 120 lawyers in 1974). He and four others left to form Tucker, Flyer, and, although they vowed to stay small, that firm grew to 55 lawyers by 1999. After 25 years, Tucker, Flyer merged with Venable on January 1, 2000, where Stef still practices full-time.

Stef joined the Tax Section in 1964 when he became an associate at Arent Fox. He joined and later became Chair of the Committee on Real Estate (then called the Committee on Real Estate Tax Problems). Among other positions, he served on Council and as Vice-Chair Committee Operations, and then as Chair of the Section in 1998–1999. During his term as Chair of the Section, he spearheaded the development of a long-range plan emphasizing diversity and participation by younger members—an emphasis that continues to be a top Section priority to this day. As Chair of the Section, Stef testified before the House Ways & Means Committee at a hearing focused on the role of accountants in the tax shelter industry.

Stef has also found time to be active in community affairs, serving lengthy stints as an officer and board member for Washington Performing Arts, the Jewish Foundation for Group Homes, and the Jewish Community Center of Greater Washington.

PROGRAM SCHEDULE
SATURDAY, MAY 9

KEYNOTE SPEAKER

William J. Wilkins
Chief Counsel
Office of Chief Counsel, IRS

2:00PM – 4:00PM Declaration, Level 1B

Choosing Wisely: When to Use (or Not Use) Mediation to Obtain Cost-Effective Closure in Exam & Collection Cases

Which cases are best suited for mediation or Fast Track Settlement? What are the factors to consider before making a recommendation to your client? What is the optimal point in the process – exam, appeals, or docketed case – to use these techniques for maximum cost effectiveness? Is the analysis different if the case originates from an exam or from a collection contact? How do the available options differ and what does that mean for your client's case? The IRS's recent expansion of its mediation program means that these tools are now available for new and different types of cases. The panel will share their real world experience in the trenches to help you think strategically about the use (or non-use) of Mediation and Fast Track Settlement in your cases.

Moderator: Kevin Johnson, Pepper Hamilton LLP, Philadelphia, PA

Panelists: The Honorable Peter J. Panuthos, Chief Special Trial Judge, US Tax Court, Washington, DC; Susan T. Mosley, Branch Chief, Branch 3, Office of Chief Counsel Procedure & Administration, IRS, Washington, DC; Gary B. Wilcox, PwC, Washington, DC; Maxine Aaronson, Law Office of Maxine Aaronson, Dallas, TX

Sponsored by: Administrative Practice; Civil and Criminal Tax Penalties; Court Procedure and Practice

2:00PM – 3:00PM Banneker, Level 1B

HUF HUF and Blow the IRS Away: An analysis of a Hindu Undivided Family ("HUF") - Is it an entity or a trust? Neither? A Tenancies in Common? How does it comply with US Tax Laws

Absent any IRS guidance on a HUF, how should practitioners counsel their clients in light of the increased information sharing due to FATCA and inter-governmental agreements? This panel explores the cross-section of US tax classifications, income and transfer tax implications, and compliance issues related to a HUF: Tenancy in common? Trust? Entity? Income Tax? Estate/Gift? FATCA? FBAR?

Panelists: Rahul P. Ranadive, Global Tax and Estate Counsel LLP, Miami, FL; Daksha Baxi, Khaitan & Co., Mumbai, India; Victor Jaramillo, Caplin & Drysdale, Washington, DC; Severiano Ortiz, Holland & Knight LLP, Chicago, IL

Sponsored by: CLE Committee

AFFILIATED ORGANIZATIONS

AMERICAN COLLEGE OF TAX COUNSEL

FRIDAY, MAY 8

7:30AM – 9:00AM Banneker, Level 1B

ACTC Board of Regents Meeting *(Executive Session)*

SATURDAY, MAY 9

7:30AM – 9:00AM Franklin/McPherson, Level 5B

ACTC Fellows Breakfast *(ACTC Members and Guests)*

NATIONAL CENTER ON PHILANTHROPY AND THE LAW

THURSDAY, MAY 7

4:30PM – 6:00PM Franklin, Level 5B

Philanthropy Professors Meeting

OHIO NORTHERN UNIVERSITY PETTIT COLLEGE OF LAW

THURSDAY, MAY 7

5:00PM – 7:00PM Constitution A, Level 3B

The Laurence Neal Woodworth Memorial Lecture and Reception

GENERAL INFORMATION

MEETING MATERIALS

In the interest of providing the most up-to-date meeting materials for all attendees, materials for the **2015 May Meeting** will be available online at **www.ambar.org/taxmtgmaterials** and via the mobile meeting application (please see page 5 for more information). Complimentary WiFi will be provided throughout the meeting space.

Should you wish to print out any materials, convenient print stations are located in Independence Foyer, Level 5B.

Please note that materials will be updated on the website throughout the meeting. These materials, to the extent they are provided to the Section, will also be made available to Tax Section members following the meeting as an exclusive membership benefit at **www.ambar.org/taxiq**.

CLE AND ETHICS CREDIT ⚖ ~~CLE~~

You ***must be registered for the meeting*** in order to attend and be eligible to receive CLE or ethics credit.

The ABA directly applies for and ordinarily receives CLE credit for ABA programs in AK, AL, AR, AZ, CA, CO, DE, GA, GU, HI, IA, IL, IN, KS, KY, LA, MN, MS, MO, MT, NC, ND, NH, NM, NV, NY, OH, OK, OR, PA, SC, TN, TX, UT, VT, VA, VI, WA, WI, and WV. These states sometimes do not approve a program for credit before the program occurs. This transitional program is approved for both newly admitted and experienced attorneys in NY. Attorneys may be eligible to receive CLE credit through reciprocity or attorney self-submission in other states. For more information about CLE accreditation in your state, visit visit **http://www.americanbar.org/groups/taxation/events_cle/fall_cle.html** or contact Tim Brady (**tim.brady@americanbar.org**).

Please note the ⚖ symbol indicates that Ethics credit will be requested for this program, and the ~~CLE~~ symbol indicates that CLE credit is not available for this program.

REQUIREMENTS FOR NEW YORK ATTORNEYS: New York-licensed attorneys are responsible for signing in and out of each session they attend. The New York sign-in/out sheets are available in each meeting room. A customized New York CLE certificate will be issued to New York-licensed attorneys following the meeting by email, based on information recorded on the sign-in sheets.

REQUIREMENTS FOR ILLINOIS ATTORNEYS: Illinois-licensed attorneys are responsible for signing in for each session they attend. The Illinois sign-in sheets are available in each meeting room. A customized Illinois Certificate of Attendance will be issued to Illinois-licensed attorneys following the meeting by email, based on information recorded on the sign-in sheets.

CPE INFORMATION

The American Bar Association is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be submitted to the National Registry of CPE Sponsors through its website: **www.learningmarket.org**.

CLE INFORMATION BOOTH

The CLE Information Booth, located in Independence Foyer, Level 5B, will be open during the following hours:

Thursday	12:00pm – 7:30pm
Friday	8:00am – 6:30pm
Saturday	8:00am – 4:00pm

GENERAL INFORMATION

Please direct all questions regarding CLE credit to the CLE Information Booth, not the Registration Desk.

REGISTRATION

Registration will be available in Independence Foyer, Level 5B. All individuals attending any part of the 2015 May Meeting, including speakers, must register and pay the registration fee. Shared registrations are not permitted. Companions are defined as non-Section members not attending substantive meetings. Any companion attending substantive programs must register and pay either the Section member or non-Section member registration fee, whichever is applicable.

The registration fee includes exclusive access to the meeting materials website, mobile meeting application and permits registrants to attend all meetings, sessions and programs; however, it does not include meal functions and social events listed as "Ticketed Event." All ticketed events are sold on a first-come, first-served basis.

REFUND POLICY

The deadline for refunds was **April 30, 2015. Refunds will not be granted at or after the meeting.**

AUDIO CDS AND MP3 INSTANT DOWNLOADS

Audio CDs and MP3s of Committee Meetings and Section Programs are available for purchase on site.

To place an order, visit the Digital Conference Providers (DCP) booth located in Constitution Coat Check, Level 3B. After the meeting visit: **www.dcporder.com/abatx/** for mail order audio CDs or **www.dcprovidersonline.com/abatx/** for instant downloads.

20% MEETING DISCOUNT ON SECTION PUBLICATIONS

Stop by the Publications Display, located on Level 3B to preview the most popular titles from the Section of Taxation and receive a 20% discount on all publication orders. Use this meeting discount code: **PTX15SMAY** online or call the ABA Service Center at (800) 285-2221 to take advantage of this special discount. Please note that the offer expires May 15, 2015.

ABA OPEN MEETINGS POLICY

In accordance with the ABA Open Meetings Policy, all ABA programs are open to the media unless they are to conduct business sessions of a confidential nature. The Association encourages media coverage of its activities. If you have questions about this policy, please contact the Sections' main office at 202-662-8670.

Please note: By attending the conference, attendees have agreed to the terms of the American Bar Association Image/Audio/Video Release Form, which allows images, audio and video recorded on site to be used for educational and promotional purposes.

SCHOLARSHIP POLICY

Scholarships to defray tuition expense for this program are available upon application on a case-by-case basis. To request a scholarship application, please contact Thomas Blandi (**thomas.blandi@americanbar.org**).

ACTIVITIES

Friday, May 8, 2015

9:00AM – 3:00PM

The Capitol Experience: Private Tour of the Capitol and Library of Congress *(Ticketed Event $160)*

Guests will experience the homes of the US Government where all of the action takes place – the Capitol Building and Library of Congress! Guests will enjoy a VIP guided tour of the nation's most recognized location- the Capitol Building A Capitol Historical Society Guide will take guests on a private VIP Tour of the Capitol Building. This special tour is a once-in-a-lifetime opportunity! Guests will be able to go into rooms and spaces that guests on the standard Capitol tour are unable to go!

Following this exciting guided tour, guests will enjoy a tour of the historic Jefferson Building of the Library of Congress. They will learn the story of the Library- America's oldest cultural institution and research arm of the Congress – by talking about its history, its collections, and the services provided to Congress and the nation.

Luncheon will follow at DBGB Daniel Boulud, French Bistro

- Roundtrip transportation will be provided.
- The activity level for this tour is moderate.
- All Guests must be prepared to pass through security screening at these locations.

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SECTION OF TAXATION

2015 JOINT FALL CLE MEETING

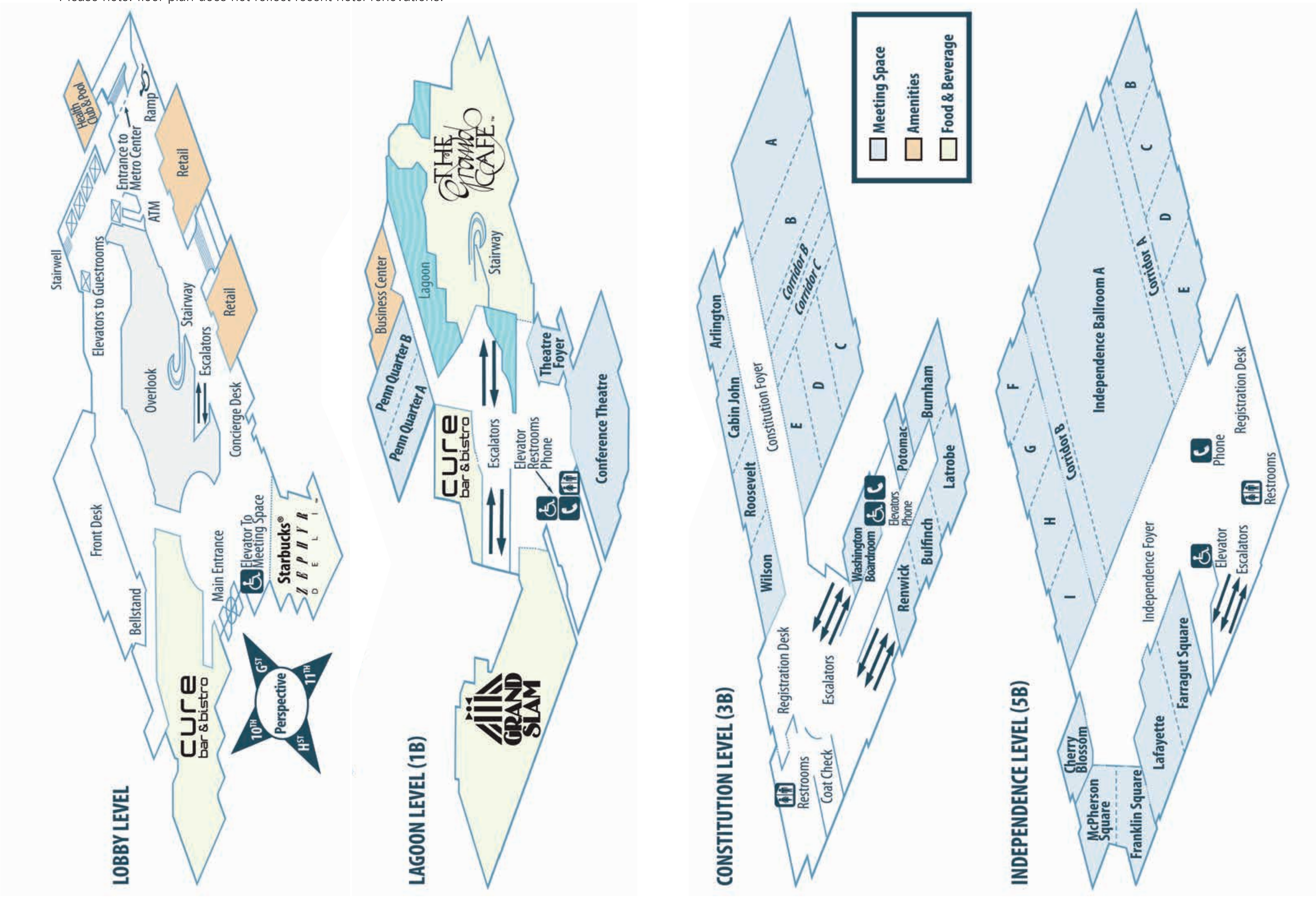
SEPTEMBER 17-19, 2015 • CHICAGO, ILLINOIS

Thank you for joining us at the May Meeting. We look forward to seeing you at the Joint Fall CLE Meeting in Chicago, IL.

< Please fold back page to the left fo find the hotel floorplan.

GRAND HYATT FLOOR PLANS

Please note: floor plan does not reflect recent hotel renovations.



ABA Section of Taxation
Tax Assistance Public Service Endowment Fund
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The *NewsQuarterly* Is Going Digital!

The Tax Section is excited to announce that the *NewsQuarterly* (NQ) will be moving soon to a digital-only format. Beginning with the Fall 2015 issue, the NQ will be available on the Section's website at **http://www.americanbar.org/groups/taxation/publications/newsquarterly_home.html**, and, as in the past, the link to a downloadable version will be distributed by e-mail to Section members.

The digital NQ will continue to offer Section news and feature other interviews and articles of interest to our members, but the digital-only format will give us greater flexibility to engage members in new ways. Over time, we hope to enhance the existing features to make them more user-friendly and to add new features with increased coverage of the Section's areas of practice and committee activities. In addition, by eliminating the paper version, the NQ digital-only format will shrink the Section's environmental footprint. As we continue to work toward the fall roll-out of the *new* NQ, the NQ Editors invite your ideas, article submissions, letters to the editor, and other inquiries. Please contact us at **tax@americanbar.or**g.

If you want to receive the NQ by e-mail, please be sure that the Section has the correct e-mail address for you and that your ABA communication preferences reflect your wish to receive the NQ by e-mail. You can call the ABA Service Center at 800-285-2221 or go to **www.myABA.org** to register your e-mail. The ABA values your privacy: we do not share or otherwise distribute our member e-mail addresses outside the ABA.