

# NYSBA

## Tax Section Annual Meeting

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

**MORNING PANELS**  
9:00 A.M. and 10:30 A.M.  
Rendezvous Ballroom and Trianon Ballroom, 3rd Floor

**DUTCH TREAT RECEPTION**  
12:00 P.M.  
Grand Ballroom Foyer, 3rd Floor

**LUNCHEON**  
12:30 P.M.  
Grand Ballroom, 3rd Floor

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

**AFTERNOON STATE & LOCAL MEETING**  
4:00 P.M.  
Lincoln Suite, 4th Floor

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



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



# SCHEDULE OF EVENTS

## Morning Program

- 8:30 - 8:45 a.m.**      **Business Meeting and Election of Officers**  
Trianon Ballroom, 3rd Floor  
Presentation by The New York Bar Foundation
- 9:00 - 10:15 a.m.**      **Current Issues in Partnership Tax**  
Rendezvous Ballroom, 3rd Floor (1.5 Professional Practice)
- Panel Chair:**      **Joel Scharfstein**, Fried, Frank, Harris, Shriver & Jacobson LLP, New York City
- Panelists:**      **Craig Gerson** (Invited), Attorney-Advisor, Office of Tax Legislative Counsel  
Department of the Treasury, Washington, D.C.
- Phillip Gall**, Ernst & Young LLP, New York City
- Marcy G. Geller**, Simpson Thacher & Bartlett LLP, New York City
- 9:00 - 10:15 a.m.**      **FATCA Basics: What Every Tax Lawyer Should Know**  
Trianon Ballroom, 3rd Floor (1.5 Professional Practice)
- Panel Chair:**      **Philip Wagman**, Clifford Chance LLP, New York City
- Panelists:**      **Kimberly S. Blanchard**, Weil, Gotshal & Manges LLP, New York City
- Amanda H. Nussbaum**, Proskauer Rose LLP, New York City
- Peter F. G. Schuur**, Debevoise & Plimpton LLP, New York City
- Andrew R. Walker**, Milbank, Tweed, Hadley & McCloy LLP, New York City
- 10:30 - 12:00 p.m.**      **What's Hot in Corporate Tax**  
Rendezvous Ballroom, 3rd Floor (1.5 Professional Practice)
- Panel Chair:**      **Gordon Warnke**, Linklaters, New York City
- Panelists:**      **William D. Alexander** (Invited), Associate Chief Counsel (Corporate)  
Internal Revenue Service, Washington, D.C.
- Neil Barr**, Davis Polk & Wardwell LLP, New York City
- Karen Gilbreath Sowell**, Ernst & Young LLP, Washington, D.C.
- 10:30 - 12:00 p.m.**      **Advanced FATCA and Recent Developments**  
Trianon Ballroom, 3rd Floor (1.5 Professional Practice)
- Panel Chair:**      **Philip Wagman**, Clifford Chance LLP, New York City
- Panelists:**      **Steven A. Musher** (Invited), Associate Chief Counsel (International)  
Internal Revenue Service, Washington, D.C.
- Andrew H. Braiterman**, Hughes Hubbard & Reed LLP, New York City
- David S. Miller**, Cadwalader, Wickersham & Taft LLP, New York City
- Andrew P. Solomon**, Sullivan & Cromwell LLP, New York City

## Reception and Luncheon

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

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

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

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

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

## Afternoon Program

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

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

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

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

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

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

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

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

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

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

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

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

## AFTERNOON STATE & LOCAL MEETING

4:00 - 5:15 p.m.

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

Commissioners Mattox, Nero, and Newman (and members of their senior staffs) will discuss recent changes in their respective agencies, as well as their imminent and long-term plans. In this traditionally informal forum, members of the Tax Section will be able to share their thoughts with New York's top tax officials. (This meeting is not open to the press.)

### NEW YORK STATE BAR ASSOCIATION Current Officers of the Tax Section Executive Committee

**DAVID H. SCHNABEL**  
 Chair

**DAVID R. SICULAR**  
 First Vice-Chair

**STEPHEN B. LAND**  
 Second Vice-Chair

**MICHAEL S. FARBER**  
 Secretary

### IMPORTANT INFORMATION

The New York State Bar Association's Meetings Department has been certified by the NYS Continuing Legal Education Board as an accredited provider of continuing legal education in the State of New York. **Under New York's MCLE rule**, this program has been approved for a total of up to **4.5 credit hours in professional practice**. This meeting will not qualify for credit for newly admitted attorneys because it is not a basic practical skills program.

**Discounts and Scholarships:** New York State Bar Association members and non-members may apply for a discount or scholarship to attend this program, based on financial hardship. ***This discount applies to the educational portion of the program only.*** Under that policy, any member of our Association or non-member who has a genuine basis of his/her hardship, if approved, can receive a discount or scholarship, depending on the circumstances. Your application must be received at least ten days prior to the program. For more details, please contact Lori Nicoll at New York State Bar Association, One Elk Street, Albany, New York 12207.



**Accommodations for Persons with Disabilities:** NYSBA welcomes participation by individuals with disabilities. NYSBA is committed to complying with all applicable laws that prohibit discrimination against individuals on the basis of disability in the full and equal enjoyment of its goods, services, programs, activities, facilities, privileges, advantages, or accommodations. To request auxiliary aids or services or if you have any questions regarding accessibility, please contact Lori Nicoll at 518-487-5563.



For overnight room accommodations, please call the Hilton New York at 1-800-445-8667 and identify yourself as a member of the New York State Bar Association. Room rates are \$249.00 for single/double occupancy. ***Reservations must be made by December 23, 2013.*** You also can reserve your overnight room on the web at [www.nysba.org/14accomm](http://www.nysba.org/14accomm).



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