

Dear Members and Honored Guests:

On behalf of the leadership team of Tax Executives Institute's New York Chapter, it is my privilege to invite you to our 47th Annual Tax Symposium. This marquee event will be held at the Sheraton New York Hotel, located on Seventh Avenue and Fifty Third Street on December 8, 2010.

This year has been highlighted by increased transparency and seeing the effect of a struggling economy on the tax system. Our technical committees have assembled prominent tax experts to address these and other emerging issues we face at our companies. Our keynote speaker is Kevin Brown of PricewaterhouseCoopers. Prior to PwC, Kevin served as Acting IRS Commissioner and Deputy Commissioner - Services and Enforcement. As part of our luncheon program, we will honor Joshua Wind, Philip Cohen and Mary Lou Fahey for their outstanding contributions at the Chapter and Institute levels.

This brochure contains the details of the technical sessions and I am sure you will conclude that the New York Chapter once again provides an excellent program for members and their staff. I would be remiss if I did not thank our sponsors for their contributions which enable us to defray the cost of this program. Many of our sponsors will have exhibits during the program. Please visit these exhibits and see what our sponsors do offer.

I look forward to seeing everyone on December 8th.

Very truly yours,

Barry Agranoff  
President New York Chapter  
Tax Executives Institute, Inc.

**Tax Executives Institute – New York Chapter**  
**FORTY-SEVENTH ANNUAL TAX SYMPOSIUM**

December 8, 2010

**PROGRAM**

**FEDERAL**

MORNING SESSION 9:30 A.M. - 10:30 A.M.

**The IRS and the Evolution of Taxpayer Transparency**

Speakers:

Donald Korb, Partner  
Sullivan & Cromwell LLP

Roland Barral, Area Counsel, Financial Services Industry  
Internal Revenue Service

MORNING SESSION 10:45 A.M. - 11:55 A.M.

**Hot Audit Topics**

Speakers:

Brian Andreoli, Partner  
DLA Piper LLP

James Wall, Principal  
J.H. Cohn LLP

AFTERNOON SESSION 2:00 P.M. - 3:45 P.M.

**Tax Accounting Issues – Nightmares and Other Things That Go Bump in the Night!**

Speaker:

Mike Baldassaro, Partner, National Tax  
Ernst & Young LLP

AFTERNOON SESSION 4:00 P.M. – 5:00 P.M.

**Current Issues: Partnerships and Joint Ventures**

Speakers:

Glenn E. Dance, Partner – National Tax  
Ernst & Young LLP

Jeff A. Erickson, Principal – National Tax  
Ernst & Young LLP

## **INTERNATIONAL - The Game is Changing - Response to Tax Authority Assertiveness**

[MORNING SESSION 9:30 A.M. – 10:30 A.M.](#)

### **Recent Developments in U.S. - International Taxation**

Speaker:

James P. Fuller, Partner  
Fenwick & West LLP

[MORNING SESSION 10:45 A.M. – 11:55 A.M.](#)

### **Impact of Aggressive Tax Authority Positions and Recent Legislation on Cross Border Acquisition/Disposition Structures**

Speakers:

James Tobin, Partner  
Ernst & Young LLP

Stephen Bates, Partner  
Ernst & Young LLP

[AFTERNOON SESSION 2:00 P.M. – 3:45 P.M.](#)

### **Five Things You Need to Do to Address 2010 International Tax Legislation**

Speakers:

Evan Migdail, Partner  
DLA Piper LLP

David Hryck, Partner  
DLA Piper LLP

### **Addressing Codified Economic Substance in the International Realm – New Restrictions or Not?**

Speaker:

Carol P. Tello, Partner  
Sutherland Asbill & Brennan LLP

[AFTERNOON SESSION 4:00 P.M. – 5:00 P.M.](#)

### **IP Migration Strategies in Light of Recent Legislative and Judicial Trends**

Speakers:

Steven M. Davis, Principal  
Deloitte Tax LLP

John P. Kennedy, Partner  
Deloitte Tax LLP

## **STATE AND LOCAL**

[MORNING SESSION 9:30 A.M. – 10:30 A.M.](#)

### **New York State and New York City Tax Update**

Speakers:

Peter Rabinowitz, Senior Director Audit Division  
New York City Department of Finance

Nonie Manion, Director of Tax Audits  
New York State Department of Taxation and Finance

Jack Trachtenberg, Taxpayer Rights Advocate  
New York State Department of Taxation and Finance

[MORNING SESSION 10:45 A.M. – 11:55 A.M.](#)

### **Nexus Issues for Non-Income Taxes**

Speakers:

Marc Simonetti, Partner  
Sutherland Asbill & Brennan LLP

Jeffrey Serether, Of Counsel  
Sutherland Asbill & Brennan LLP

[AFTERNOON SESSION 2:00 P.M. - 3:45 P.M.](#)

### **Update on Multistate Combined and Unitary Reporting**

Speakers:

Peter L. Faber, Partner  
McDermott Will & Emery LLP

Leah Robinson, Partner  
McDermott Will & Emery LLP

### **Sales Taxation of Bits and Bytes**

Speakers:

Jeremiah Lynch, Principal  
Ryan and Company

Carolynn S. Iafrate, CFO  
Industry Sales Tax Solutions

[AFTERNOON SESSION 4:00 P.M. – 5:00 P.M.](#)

### **State Tax Roundup**

Speaker:

Paul H. Frankel, Partner  
Morrison & Foerster LLP

## PROGRAM

**Sheraton New York Hotel**  
811 Seventh Avenue (at 53<sup>rd</sup> Street)  
New York, N.Y.

Registration and Continental Breakfast: 8:30 A.M. - 9:30 A.M.  
Technical Sessions: 9:30 A.M. - 11:55 A.M.  
Luncheon: 12:00 Noon  
Technical Sessions: 2:00 P.M. - 5:00 P.M.  
Reception and Buffet Dinner 5:10 P.M.

**To Register Please Log onto:**

<https://acteva.com/go/teiny>

## LUNCHEON SPEAKERS

**Keynote Speaker – Kevin Brown, PricewaterhouseCoopers**  
**Barry Agranoff - President, New York Chapter, TEI**

**Presentation of Awards to:**

**Philip Cohen** – TEI Washington Federal Tax Committee Meritorious Service Award  
**Mary Lou Fahey**- Tax Executives Institute General Counsel- Outstanding Service Award  
**Joshua Wind** –Meritorious Chapter Service Award

### *FEDERAL TAX COMMITTEE*

Vice-President – Jeff Cheshire  
Chairman – Gregory Viggiano  
Vice-Chair – Lissette Roman

### *STATE & LOCAL COMMITTEE*

Vice-President— Paul Bulzacchelli  
Chairman — Mark Mishler  
Vice-Chairman —Tushar Mehta

### *INTERNATIONAL TAX COMMITTEE*

Vice President— Gregory Postian  
Chairman — Jay Bharatiya  
Vice-Chair – Anthony Alexandrou

### *SYMPOSIUM COMMITTEE*

Vice-President – Brian Spillane  
Chair – Linda A. Klang  
Vice-Chair – Thomas P. Wharton

### *IRS ADMINISTRATIVE AFFAIRS COMMITTEE*

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Vice-Chair – Shaheda Sayed  
Vice-Chair – Iris Schneider  
Vice-Chairman – Harold J. Spitzfaden

6 Continuing Education Credits Granted -- New York CPE