

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

December 7, 2011

**PROGRAM**

**FEDERAL**

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

**Economic Substance**

Speakers:

Peter Faber, Partner  
McDermott, Will & Emery  
Leah Robinson, Partner  
McDermott, Will & Emery

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

**Tax Controversy and Hot Audit Topics**

Speakers:

Donald Korb, Partner  
Sullivan & Cromwell LLP  
Barry B. Shott, Senior Managing Director  
PricewaterhouseCoopers LLP

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

**Global Information Reporting and FATCA**

Speakers:

Dominick Dell'Imperio, Partner  
PricewaterhouseCoopers LLP  
Candace Ewell, Managing Director  
PricewaterhouseCoopers LLP

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

**Proposed Legislation Update**

Speakers:

Michael Flaherty, Partner  
WTP Advisors LLC  
Jeff Malo, Director  
WTP Advisors LLC

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

**Tax Accounting Update, Accounting Regulatory Developments, and UTP Considerations**

Speaker:

Joan Schumaker, Partner  
Ernst & Young LLP

## **INTERNATIONAL**

MORNING SESSION 9:30 A.M. – 11:30 A.M.

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

Speakers:

James P. Fuller, Partner  
Fenwick & West LLP  
Adam Halpern, Partner  
Fenwick & West LLP

AFTERNOON SESSION 2:00 P.M. – 3:00 P.M.

### **International M&A – Latest Planning Ideas**

Speaker:

Tom May, Partner  
Baker & McKenzie LLP

AFTERNOON SESSION 3:00 P.M. – 3:45 P.M.

### **Asia Tax Discussion Tax Developments in China/India and Update on Asian Supply Chain Structures**

Speakers:

Lisa Lim, Americas Director – Tax Effective Supply Chain Management  
Ernst & Young LLP  
Sandy Chu, Greater China Tax Desk  
Ernst & Young LLP  
Tejas Mody, Indian Tax Desk  
Ernst & Young LLP

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

### **Substantial Contribution – Overview and Practical Guide to Documentation, Defense and Preparation for Audits**

Speakers:

Steven M. Davis, Principal – Business Model Optimization  
Deloitte Tax LLP  
Lisa Lim, Americas Director – Tax Effective Supply Chain Management  
Ernst & Young LLP  
Duncan Forsythe, Partner  
KPMG, LLP  
Corporate Panelist

## **STATE AND LOCAL**

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

### **What is “New” in New York State and New York City**

Speakers:

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

Peter Rabinowitz, Chief of Audit Operations  
New York City Department of Finance

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

### **Combined Returns – Tricks and Tips**

Speaker:

Richard W. Genetelli, President  
Genetelli Consulting Group

AFTERNOON SESSION 2:00 P.M. - 2:50 P.M.

### **Michigan/Texas Update**

Speakers:

Patrick R. Van Tiflin, Partner  
Honigman Miller Schwartz and Cohn LLP

Kirk R. Lyda, Partner  
Jones Day

AFTERNOON SESSION 2:50 P.M. – 3:45 P.M.

### **Multistate Corporate Income Tax Trends Including California, Economic Nexus and Resident/Non-Resident Legislation**

Speakers:

Maureen Pechacek, Partner  
PricewaterhouseCoopers LLP

Robert Porcelli, Director  
PricewaterhouseCoopers LLP

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

### **Significant Developments in State Taxation**

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:

<http://www.acteva.com/go/teiny>

### LUNCHEON SPEAKERS

#### Keynote Speaker – TBA

**Raymond Gwydir - President, New York Chapter, TEI**

#### Presentation of Award to:

**Mary Lou Fahey- Tax Executives Institute General Counsel (retired) - Outstanding Service Award**

#### *FEDERAL TAX COMMITTEE*

Vice-President – Gregory Viggiano

Chair – Lissette Roman

Vice-Chair – Paul Bulzacchelli

#### *INTERNATIONAL TAX COMMITTEE*

Vice President— Gregory Postian

Chairman — Dean Santucci

Vice-Chairman – Michael Leahy

#### *STATE & LOCAL COMMITTEE*

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Vice-Chairman —Kevin Mulvihill

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Vice-Chairman—Steven J. Rogozinski

Vice-Chair – Shaheda Sayed

Vice-Chair – Iris Schneider

Vice-Chairman – Harold J. Spitzfaden

6 Continuing Education Credits Granted -- New York CPE

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 48th 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 7, 2011.

This year has again 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. As part of our luncheon program, we will honor Mary Lou Fahey for her outstanding contribution at the Institute level.

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 colleagues. 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 7th.

Very truly yours,

Ray Gwydir  
President New York Chapter  
Tax Executives Institute, Inc.