

Tax Executives Institute – New York Chapter

SIXTY FIRST ANNUAL TAX SYMPOSIUM

Thursday, December 5, 2024

Convене Conference Center
237 Park Avenue, NY, NY – Lobby Level

Registration and Breakfast: 8:15 A.M. - 8:55 A.M.

Technical Sessions: 9:00 A.M. – 11:45 P.M.

Lunch: 11:45 A.M.– 12:45 P.M.

Technical Sessions: 12:45 P.M. – 4:15 P.M.

Early Bird Pricing ends November 15th -- To register:

<https://app.memberplanet.com/#/event/tei-newyork/teinyorkchapter61stannualtaxsymposium>

PROGRAM

MORNING SESSION 9:00 - 10:15 A.M.

PLENARY SESSION – Room: **Forum**

What's Next? The Impact of the 2024 Elections

Speakers:

Stephen P. Kranz, Partner
McDermott Will & Emery LLP
Lauren Ponds, Partner
Miller Chevalier

Morning break: 10:15 - 10:30 A.M

MORNING SESSION 10:30 - 11:45 A.M.

CONCURRENT SESSIONS: 1 or 2

1 – Managing SALT Controversy- Best Practices, Taxpayer Bill of Rights

Speakers:

Jeffrey Friedman, Partner
Eversheds Sutherland
Joseph Carzo, Director, State and Local Tax
CohnReznick LLP

2 - International Hot Topics: Navigating the Impact of Pillar 2 and Rethinking the Tax Approach

Speakers:

Serge Huysmans, Principal - BEPS Desk
Ernst & Young LLP
Kara Mungovan, Member and Tax Policy Practice Co-Lead
Davis Polk

Lunch: 11:45 A.M. – 12:45 P.M.

AFTERNOON SESSION 12:45 P.M.-2 P.M.

CONCURRENT SESSIONS: 1 or 2

1 – Tax Accounting – New Disclosure Rules, Footnotes, Year-End Issues, BEPS Pillar 2, International ESG Disclosures

Speakers:

Peter Crocco, Partner
Andersen Tax LLC
Adam Scarpati, Tax Principal
BDO USA

2 – Optimizing and Protecting Tax Attributes: NOLs, 163j, RDE, Valuation Allowance

Speakers:

Brian Hill, Partner
RSM US LLC
Todd Reinstein, Partner
Forvis Mazars US

AFTERNOON SESSION: 2 P.M.- 3:15 P.M.

CONCURRENT SESSIONS: 1 or 2

1 - State and Local Taxes – The Year In Review: Most Impactful SALT cases and Legislative Changes

Speakers:

Marc Simonetti, Partner
State Tax Law LLC
Drew Vandenbrul, Managing Director
Grant Thornton

2 – Where in the World? - International Tax Planning – Transfer Pricing, Managing IP/Profits

Speaker:

Joe Tobin, Principal
Deloitte Tax LLP

Proposed Section 987, Foreign Currency Regs, Loss Recognition and Effective Dates

Speaker:

Michael Turgeon, Partner
PricewaterhouseCoopers

Break: 3:15 P.M. - 3:30 P.M.

AFTERNOON SESSION: 3:30 P.M. – 4:15 P.M.

CONCURRENT SESSIONS: 1 or 2

1 - Year-End Employment Tax Insights

- Proposed DOL independent contractor rules
- Increase in NY payroll tax audits
- Corporate Aircraft and more

Speaker:

Samantha Jo Marciliano, Managing Director
KPMG LLP

2 – Valuations Where You Least Expect It: Cross Border Transactions and BEPS, Debt Transactions, NOL Limitations, Purchase Price Allocations

Speakers: Tom Gottfried, Managing Director
Valuation Research Corp
Joseph Ciccarelli, Managing Director
Global Tax Management