

WALL STREET TAX EDUCATIONAL CORP.

Fall Tax Seminar – Thursday, May 19, 2016

New York Marriott Marquis – 1535 Broadway, New York NY

Program

8:15 am – 8:45 am BREAKFAST & REGISTRATION

8:45 am – 8:50 am OPENING REMARKS – Eric Klein, President, WSTA & WSTEC

8:50 am – 10:00 am STATE & LOCAL TAXATION

Topics: NY: apportionment issues; draft regs. on combined reporting; new investment capital rules. Multistate: new market-based sourcing regimes; other factor sourcing issues; discussion of income/franchise tax cases. Sales and use tax: current issues.

Panelists: Peter Faber, McDermott Will and Emery
Gregg Roberts, Morrison and Foerster
Leah Robinson, Sutherland Asbill
Jane Steinmetz, EY

Moderator: Lou Palladino, Morgan Stanley

10:00 am – 10:15 am BREAK

10:15 am - 11:30 am CURRENT TOPICS IN ALTERNATIVE INVESTMENT FUND TAXATION

Topics: BDCs, litigation claims, peer-to-peer lending, registered obligations, OTC FX options, basket derivatives update, partnership audit rules update

Panelists: Jay Freedman, KPMG
Mark Leeds, Mayer Brown
Michael Meisler, EY

Moderator: Guillaume Lefebvre, Two Sigma

11:30 am - 11:40 am BREAK

11:40 am – 12:50 pm FEDERAL/FINANCIAL PRODUCTS

Topics: Section 385 Regulations - Overview/Domestic Aspects/Treasury Center Considerations; Section 305(c) Regulations

Panelists: Mike Shulman, Shearman & Sterling
Chip Harter, PwC
Jeff Hochberg, Sullivan & Cromwell

Moderator: Jay Friedman, Goldman Sachs

12:50 pm – 1:20 pm LUNCH

1:20 pm – 2:00 pm SPEAKER: Pam Olson, PwC

2:00 pm – 3:15 pm INTERNATIONAL TAX

Topics: New Inversion Rules; International Updates; Impact of Section 385 Regulations on International Issues

Panelists: Jeff Quinn, Shearman & Sterling
Chris Housman, EY

Moderator: Susan Ludwigson, Morgan Stanley

3:15 pm – 3:30 pm BREAK

3:30 pm – 4:45 pm ETHICS

Topics: Protecting Privilege for Legal Advice to the Business by In-House Tax Lawyers

Panelists: Diana Wollman, Cleary, Gottlieb, Steen & Hamilton
Daniel Dumezich, Deloitte
Bryan Skarlatos, Kostelantz & Fink

Moderator: Elena Romanova, CITI

4:45 pm – 6:00 pm COCKTAILS AND NETWORKING RECEPTION