

SECTION OF TAXATION MIDYEAR MEETING

LAKE LAS VEGAS, NV · Loews Resort & Ritz-Carlton
JANUARY 17–19, 2008



FINAL PROGRAM

**THE AMERICAN BAR ASSOCIATION
SECTION OF TAXATION**

Would like to acknowledge the support
of our sponsors for their involvement
in the 2008 Midyear Meeting:



&



Primary Sponsor of the ABA Section of Taxation

SILVER



Taggart & Hawkins,
A Professional Corporation

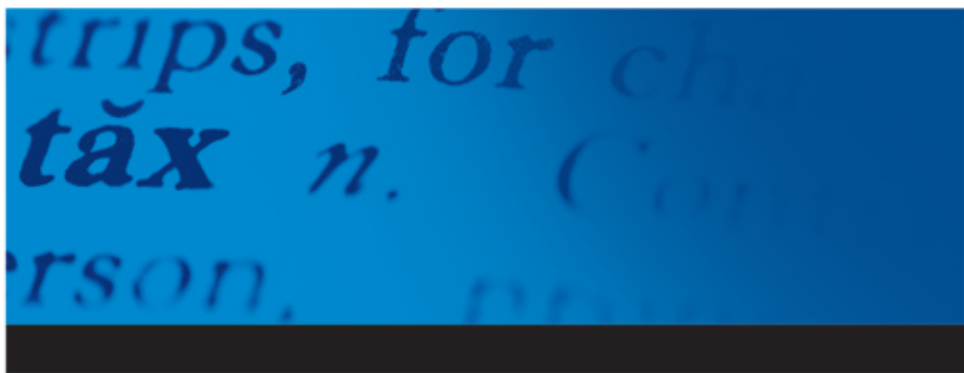
BRONZE

Baker & McKenzie
Chicago Deferred Exchange Company
Houlihan Lokey
J.P. Morgan Property Exchange, Inc.



2008 MIDYEAR MEETING

HIGHLIGHTS	4
PROGRAM SCHEDULE	
Thursday, January 17	
PM Schedule	7
Friday, January 18	
AM Schedule	8
PM Schedule	23
Saturday, January 19	
AM Schedule	42
PM Schedule	50
AFFILIATED ORGANIZATIONS	55
GENERAL INFORMATION	56
ACTIVITIES	58
ALPHA SCHEDULE	60
FUTURE MEETINGS/CLE CALENDAR	67
FLOORPLAN (See foldout on last page)	



Thomson Tax and Accounting and Thomson West are new primary sponsors of the ABA Section of Taxation

- **Thomson Tax and Accounting**, America's premier tax and accounting provider, offers such leading brands as RIA, WG&L and Checkpoint.
- **Thomson West**, America's premier legal publisher, supports tax practitioners with a wide range of primary and secondary tax material.

Visit us at the ABA Section of Taxation Midyear Meeting

Please visit the Thomson Tax and Accounting and Thomson West booths to learn about quality tax content and cutting-edge technology that can help you do your work more quickly, accurately and thoroughly.

We look forward to meeting you.



STANLEY L. BLEND
SECTION CHAIR



The Section of Taxation welcomes you to the **2008 Midyear Meeting** in Lake Las Vegas, Nevada. We are pleased that you have decided to join us and take advantage of the opportunity to participate in high-level discussions between private practitioners and government on the most important issues facing tax lawyers today. We hope you enjoy the meeting and we welcome your comments.

HIGHLIGHTS



SECTION LUNCHEON/PLENARY SESSION

Join us Saturday for a panel discussion on “New Standards and Higher Penalties for Practitioners Who Give Tax Advice.”

JANET SPRAGENS PRO BONO AWARD

The Janet Spragens Pro Bono Award was established to recognize one or more individuals or law firms that have provided meritorious *pro bono* service in the representation of low-income taxpayers. The award is intended to encourage *pro bono* activities by all members through public recognition of the *pro bono* services of the annual award winner.

The seventh annual Janet Spragens Pro Bono Award will be presented to **Joseph Barry Schimmel** at the Section Luncheon/Plenary Session on Saturday. Former recipients of the award are Professor Leslie M. Book (2007), Janet Spragens (2006), Diana L. Leyden (2005), Karen L. Hawkins (2004), Peter A. Lowy (2003) and Victoria Bjorklund (2002).

JOHN S. NOLAN TAX LAW FELLOWS

The Section will recognize the outgoing 2007 – 2008 fellows and announce the incoming 2008 – 2009 fellows during the Section Luncheon.

2007 – 2008 Jennifer Alexander, Deloitte Tax LLP, Washington, DC
Adam Cohen, Holland & Hart LLP, Denver, CO
Christopher D’Amico, Dean Mead Egerton Bloodworth Capouano
& Bozarth PA, Orlando, FL
Thomas Greenaway, Office of Chief Counsel, IRS, Boston, MA
Peter A. Lowy, Shell Oil Company, Houston, TX
Brandee A. Tilman, The Walt Disney Company, Glendale, CA

2008 – 2009 Megan L Brackney, Kostelanetz & Fink LLP, New York, NY
William E. Hansen, McDermott Will & Emery LLP, Washington, DC
Sarah M. Johnson, Venable LLP, Washington, DC
Robb A. Longman, Joseph Greenwald & Laake PA, Greenbelt, MD
Colleen M. O’Connor, Ernst & Young LLP, Washington, DC
Juan F. Vasquez Jr., Chamberlain Hrdlicka White Williams &
Martin, Houston, TX

VOLUNTEER INCOME TAX ASSISTANCE (VITA) ON-SITE TRAINING

The VITA training for the 2008 Midyear Meeting has been cancelled.



HIGHLIGHTS

REGISTRATION

Registration will be available at both the Loews and the Ritz-Carlton. All individuals attending any part of the **2008 Midyear Meeting**, *including speakers*, must register and pay the registration fee. Shared registrations are not permitted. Companions are defined as non-Section members not attending substantive meetings. Any companion attending substantive programs must register and pay either the Section member or non-Section member registration fee, whichever is applicable.

The registration fee includes one set of meeting materials on CD-ROM and permits registrants to attend all meetings, sessions and programs; however, it does not include meal functions and social events listed as "*Ticketed Event*." All ticketed events are sold on a first-come, first-served basis. Payment may be made by check or credit card. The Section accepts American Express, MasterCard and VISA.

Your meeting bags are provided courtesy of Thomson West.

ON-SITE REGISTRATION AND TICKET PURCHASE HOURS

The Registration Desk will be located at the Loews in the Medinas Foyer and at the Ritz-Carlton on the Lobby Level in the Ballroom Foyer and will be open during the following hours:

Thursday	12:00pm – 7:30pm
Friday	6:30am – 6:30pm
Saturday	6:30am – 2:00pm

BADGE IDENTIFICATION

RED Bar	Section Officers, Council Members, Committee Chairs, Task Force Chairs, Past Section Chairs
GREEN Bar	Government Officials/Guests
BLUE Bar	Young Lawyers
GRAY Bar	Law Students and LLM Candidates
YELLOW Bar	First-Time Attendees
ORANGE Bar	Companions
YELLOW Badge	Press

HIGHLIGHTS



SHUTTLE BUS SERVICE

Shuttle Bus service will be provided between the Loews, Ritz-Carlton and the Montelago Village Resort. Uniformed dispatchers will be stationed at the front entrance of each hotel to assist attendees with the shuttle bus. The shuttle busses will operate during the following hours:

Friday 6:00am – 9:00pm

Saturday 6:00am – 6:00pm

In addition, shuttle service within the Lake Las Vegas Resort is available from 7:00am – 10:00pm. Please see the hotel bell desk for more information.

SECTION EXHIBIT

The Section Exhibit will be open on Friday and Saturday from 7:00am – 5:00pm in the Medinas Foyer at the Loews. Representatives from the following entities will demonstrate the latest research methods and exciting new products to aid in your daily practice.

Chicago Deferred Exchange Company

Bureau of National Affairs

Thomson Tax & Accounting


Thomson West

Wachovia Securities Exchange



PROGRAM SCHEDULE

PROGRAM SCHEDULE THURSDAY, JANUARY 17 · PM

 = Taped

★ = Young Lawyers Program

 = Ethics Credit Requested

 = No CLE Credit

NOTE: Programs are listed chronologically by day and starting time. Refer to p. 60 for the Alpha Schedule.

7:00AM – 2:00PM

Reflection Bay Golf Course

Golf Outing at Reflection Bay  (Ticketed Event)

See p. 58 for a full description.

9:00AM – 12:00PM

Casablanca A&B, Loews

Officers and Council Meeting  (Executive Session)

6:00PM – 10:00PM

Zefferino, Venetian

Administrative Practice Leadership Dinner  (Invitation Only)

'Dinner on the Strip.' Dinner meeting in Las Vegas preceded by a cash bar. Transportation is included.

6:30PM – 9:30PM

Rotunda Room, Reflection Bay

Partnerships & LLCs and Real Estate Dinner ★  (Reservations Required)

Members of the Partnerships & LLCs and the Real Estate Committees will meet for cocktails and dinner in the Rotunda Room at Reflection Bay Golf Club, a restaurant with water views and within walking distance (less than half a mile) from the Loews hotel. Cash bar will begin at 6:30pm followed by dinner at 7:30pm. *Reservation and advance payment required.*

6:30PM – 10:00PM


Rabat A, Loews

State and Local Taxes Cash Bar and Executive Business Meeting Dinner 
(Executive Session)

PROGRAM SCHEDULE

AM · FRIDAY, JANUARY 18



 = Taped

★ = Young Lawyers Program

 = Ethics Credit Requested

 = No CLE Credit

NOTE: Programs are listed chronologically by day and starting time. Refer to p. 60 for the Alpha Schedule.

7:00AM – 9:00AM

Casablanca G, Loews

Capital Recovery and Leasing

CHAIR: Kevin D. Anderson, BDO Seidman LLP, Bethesda, MD

7:00am **Current Developments Report and Update on Pending Guidance Projects.** This program will cover the important recent developments in the areas of capital recovery and leasing since the 2007 Joint Fall CLE Meeting in Vancouver, BC, and provide an update on guidance projects in these areas. The program will include a brief discussion of guidance on the treatment of expenditures with respect to tangible property if issued before the meeting.

MODERATOR: Katherine Breaks, KPMG LLP, Washington, DC.

PANELISTS: Sharon Kay, Taxation Specialist, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC; Brandon Carlton, Attorney-Advisor, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC.

8:00am **Tenant Improvement Allowances and Recovery of Leasehold Improvements.** This program will cover current developments and open issues regarding tenant improvement allowances within and outside the section 110 safe harbor. In addition, the program will discuss issues concerning the capital recovery of leasehold improvements.

MODERATOR: Glenn Johnson, Ernst & Young LLP, Washington, DC.

PANELISTS: Brandon Carlton, Attorney-Advisor, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC; Robert Schachat, Ernst & Young LLP, Washington, DC; Jill Darrow, Katten Muchin Rosenman LLP, New York, NY.

7:00AM – 7:30AM

Rabat A, Loews

First Time Attendee Orientation ★

7:00AM – 4:00PM

Medinas Foyer, Loews

Hospitality Center *(Complimentary)*

Ballroom Foyer, Lobby Level, Ritz

Complimentary continental breakfast will be served in the morning. Snacks, coffee, sodas and water will be available in the afternoon.

7:30AM – 8:30AM

Vineyard, Garden Level, Ritz

Exempt Organizations Subcommittees on Audits & Appeals, Political & Lobbying Organizations & Activities and Religious Organizations

CHAIRS: Greg Colvin, Silk Adler & Colvin, San Francisco, CA; Professor Miriam Galston, George Washington University Law School, Washington, DC; Boyd J. Black, The Church of Jesus Christ of Latter-day Saints, Salt Lake City, UT; Thomas E. Wetmore, General



PROGRAM SCHEDULE

FRIDAY, JANUARY 18 · AM

Conference of Seventh-day Adventists, Silver Spring, MD; Marcus S. Owens, Caplin & Drysdale Chartered, Washington, DC; Robert Louthian, McDermott Will & Emery LLP, Washington, DC

7:30am Emerging Election Year Issues and Controversies for Charities, Churches and Other Tax-Exempt Organizations.

PANELIST: Judith E. Kindell, Technical Advisor to the Director, Exempt Organizations, IRS, Washington, DC.

7:30AM – 8:30AM

Tuscany, Garden Level, Ritz

Exempt Organizations Subcommittee on Health-Care Organizations

CHAIRS: Chris Jedrey, McDermott Will & Emery LLP, Boston, MA; T.J. Sullivan, Drinker Biddle & Reath LLP, Washington, DC

7:30am Roundtable Discussion of Current Developments, Including the Report of the Panel on the Nonprofit Sector, Principles for Good Governance and Ethical Practice and the AHA Comments on the Senate Finance Committee Proposed Changes to Community Benefit Standards.

7:30AM – 8:30AM

Orchard, Garden Level, Ritz

Exempt Organizations Subcommittees on Private Foundations, Unrelated Business Income and International Philanthropy

CHAIRS: Betsy Buchalter Adler, Silk Adler & Colvin, San Francisco, CA; Victoria B. Bjorklund, Simpson Thacher & Bartlett LLP, New York, NY (International Philanthropy); LaVerne Woods, Davis Wright Tremaine LLP, Seattle, WA; Lisa L. Johnsen, Bill & Melinda Gates Foundation, Seattle, WA (Private Foundations); Laura Kalick, BDO Seidman LLP, Bethesda, MD; Robert A. Wexler, Silk Adler & Colvin, San Francisco, CA (Unrelated Business Income)

7:30am Roundtable Discussion of Recent Developments.

7:30AM – 8:30AM

Safi, Loews

Task Force on Patenting Tax Strategies

CO-CHAIRS: Professor Ellen P. Aprill, Loyola Law School, Los Angeles, CA; Dennis Drapkin, Jones Day, Dallas, TX

8:00AM – 11:00AM

Casablanca C, Loews

Affiliated and Related Corporations

CHAIR: Derek Cain, PricewaterhouseCoopers LLP, Washington, DC

8:00am **Recent Developments.** This panel will review recent developments in the consolidated return area, including relevant private letter rulings and technical advice memoranda.

MODERATOR: Jeffrey Vogel, KPMG LLP, Washington, DC.

PANELISTS: Mark Schneider, Deputy Associate Chief Counsel (Corporate), IRS, Washington, DC; James Banks, PricewaterhouseCoopers LLP, Los Angeles, CA.



9:00am Consolidated Successors. This panel will consider the new loss disallowance rules (if finalized), including the basic rules, problems with those rules and possible amendments to the rules.

MODERATORS: Derek Cain, PricewaterhouseCoopers LLP, Washington, DC; Mark Schneider, Deputy Associate Chief Counsel (Corporate), IRS, Washington, DC.

PANELISTS: Devon Bodoh, Dewey & LeBoeuf LLP, Washington, DC; Mark Schneider, Deputy Associate Chief Counsel (Corporate), IRS, Washington, DC; Marc Countryman, Attorney-Advisor, Tax Legislative Counsel, Department of Treasury, Washington, DC; Jonathan Forrest; Deloitte Tax LLP, Washington, DC.

10:00am Basis in Consolidation. This panel will discuss the coordination of consolidated and non-consolidated basis rules.

MODERATORS: Gordon Warnke, Dewey & LeBoeuf LLP, New York, NY.

PANELISTS: Marc Countryman, Attorney-Advisor, Tax Legislative Counsel, Department of Treasury, Washington, DC; Theresa Abell, Counsel to the Associate Chief Counsel (Corporate), IRS, Washington, DC; Professor Don Leatherman, University of Tennessee College of Law, Knoxville, TN; Brian Peabody, Ernst & Young LLP, Washington, DC.

8:30AM – 11:30AM

Casablanca E, Loews

Administrative Practice

CHAIR: Phillip A. Pillar, Greenberg Traurig LLP, Philadelphia, PA

8:30am Opening Remarks. 

8:35am Navigating the Reportable Transactions and Penalty Regulations – Practitioner’s “Shelter Round-Up.” This panel will discuss technical details and practitioners’ experience with the reportable transaction regulations and other guidance under sections 6011, 6111 and 6112. The panel will also discuss the potentially applicable penalties under sections 6707A, 6707 and 6708.

MODERATOR: Robert T. Carney, O’Melveny & Myers LLP, Washington, DC.

PANELISTS: Anita Soucy, Attorney-Advisor, Tax Legislative Counsel, Department of Treasury, Washington, DC; John E. Budde, Senior Attorney, Office of Chief Counsel, IRS, Cincinnati, OH.

9:20am Important Developments. This panel will summarize recent developments affecting the IRS administrative practice.

PANELISTS: Kevin Johnson, Chamberlain Hrdlicka White Williams & Martin PC, Philadelphia, PA; Kevin M. Jacobs, Latham & Watkins LLP, Washington, DC.

9:40am The Rise and Fall of Interest Suspension Under § 6404(g). This panel will provide a primer on the interest suspension provisions of IRC § 6404(g), including the many exceptions that limit the applicability of interest suspension.



PROGRAM SCHEDULE FRIDAY, JANUARY 18 · AM

PANELISTS: Brian Lynn, Caplin & Drysdale Chartered, Washington, DC; Jeanne Ross, Attorney-Advisor, Tax Legislative Counsel, Department of Treasury, Washington, DC; Henry Schneiderman, Special Counsel to the Associate Chief Counsel, IRS, Washington, DC.

10:00am **Return Preparers: As the Stakes Increase, So Does the Importance of Calculating the Odds.** This panel will discuss recent amendments to the preparer penalty provisions of IRC § 6694.

MODERATOR: Christopher S. Rizek, Caplin & Drysdale Chartered, Washington, DC.

PANELISTS: Anita Soucy, Attorney-Advisor, Tax Legislative Counsel, Department of Treasury, Washington, DC; Thomas J. Kane, Special Counsel, Office of Chief Counsel, IRS, Washington, DC; Fred Murray, Grant Thornton LLP, Washington, DC; Eli Dicker, Tax Executives Institute, Washington, DC.

10:45am **Simultaneous Civil/Criminal Proceedings.** With the increasing intersection of criminal and civil tax proceedings, this panel will discuss issues that arise when both civil and criminal tax cases are being pursued simultaneously.

MODERATOR: Ronald L. Buch, McKee Nelson LLP, Washington, DC.

PANELISTS: Christopher B. Sterner, Division Counsel, Large & Mid-Size Business, IRS, Washington, DC; Dana J. Boente, First Assistant US Attorney, US Attorney's Office for the Eastern District of Virginia, Alexandria, VA; Miriam L. Fisher, Morgan Lewis & Bockius LLP, Washington, DC.

8:30AM – 11:30AM

Casablanca F, Loews

Banking and Savings Institutions

CHAIR: Michelle M. Henkel, Alston & Bird LLP, Atlanta, GA

8:30am **Subprime Markets, Predatory Lending Practices and Over-Rated Debt.** Since the collapse of the subprime market, attention has been focused on mortgage fees and adjustable rate mortgages, rating agencies, debt modifications and securitized debt and proposals to change the debt cancellation rules. This panel will look at tax and non-tax implications of this problem.

MODERATOR: John Ensminger, Law Offices of John Ensminger, Stone Ridge, NY.

PANELISTS: Yoram Keinan, Greenberg Traurig LLP, New York, NY; Fran Mordi, American Bankers Association, Washington, DC; Michael Novey, Associate Tax Legislative Counsel, Tax Legislative Counsel, Department of Treasury, Washington, DC.



9:30am **Litigation and Behind-the-Scenes Developments in the Financial Services Industry.** This panel will discuss (i) the latest developments with LILOs and SILOs, including changes in settlement ranges and changes in IRS personnel; (ii) the “designation for litigation” process, including how it works, how cases are selected, what does it mean and what internal analyses can the IRS disclose; (iii) the issue tiering process, including how issues are selected, what factors impact the selection, whether the tiered issues are public and what internal analyses can the IRS disclose and (iv) where the IRS is headed after *Textron* and what the IRS is planning to do next vis-à-vis FIN-48.

MODERATOR: Michelle M. Henkel, Alston & Bird LLP, Atlanta, GA.

PANELIST: Roland Barral, Area Counsel-Financial Services, Division Counsel (Large & Mid-Size Business), IRS, New York, NY.

10:30am **Recent Transactional Developments.** This panel will scrutinize the recent output from the Department of Treasury and Capitol Hill on including exchange traded notes, the *People’s Savings* case and its impact on interpretation of section 265, reaction to section 475 safeharbor rules and section 1221(a)(4).

MODERATOR: Viva Hammer, Crowell & Moring LLP, New York, NY.

PANELISTS: John Rogers III, Senior Attorney, Office of Chief Counsel (Financial Institutions & Products), IRS, Washington, DC; Vincent Guiliano, Banking Industry Director, LMSB Area Counsel, IRS, New York, NY; Robert Dilworth, McDermott Will & Emery LLP, Washington, DC; Catherine C. Barre, Legg Mason & Co LLC, Baltimore, MD.

8:30AM – 11:30AM

Casablanca B, Loews

Closely Held Businesses

CHAIR: William P. Prescott, Wickens Herzer Panza Cook & Batista Co, Avon, OH

8:30am **Opening Remarks.** 

8:35am **Entity Selection for the Closely Held Business.**

PANELISTS: Alson R. Martin, Lathrop & Gage LC, Overland Park, KS; Leslie E. Grodd, Halloran & Sage LLC, Westport, CT; Eric L. Green, Convicer & Percy LLP, Glastonbury, CT.

9:30am **S Corporations... What’s New?**

SPEAKERS: Ronald A. Levitt, Sirote & Permutt PC, Birmingham, AL; Stephen R. Looney, Dean Mead Egerton Bloodworth Capouano & Bozarth PA, Orlando, FL.

10:15am **Entity Formalities, Governance and Dissolution.**

PANELISTS: David L. Herzer, Wickens Herzer Panza Cook & Batista Co, Avon, OH; James Robert Turnipseed, Bowron Latta & Wasden PC, Mobile, AL.



PROGRAM SCHEDULE

FRIDAY, JANUARY 18 · AM

8:30AM – 9:30AM

Baraka, Loews

Companions Breakfast ☕ (Complimentary)

8:30AM – 10:15AM

Tuscany, Garden Level, Ritz

Employee Benefits Administrative Practices Update

Presented by the Subcommittee on Self Correction, Determination Letters and Other Administrative Practices

CHAIRS/VICE-CHAIR: Martha L. Hutzelman, Kruchko & Fries, McLean, VA; Joy M. Mercer, Joy M. Mercer PC, Florham Park, NJ; Lisa Tavares, Venable LLP, Washington, DC; Benjamin J. Evans, Greenebaum Doll & McDonald PLLC, Louisville, KY (*Young Lawyer Liaison*)

The subcommittee will discuss recent developments regarding (i) the staggered remedial amendment period system for determination letters, including interim amendment requirements and deadlines, (ii) EP examination and enforcement activity and (iii) EPCRS.

SPEAKERS: Andrew Zuckerman, Director, EP Rulings and Agreements, IRS, Washington, DC; Ingrid Grinde, Tax Law Specialist, EP Technical Guidance and Quality Assurance, IRS, Washington, DC.

8:30AM – 10:15AM

Montelago I, Garden Level, Ritz

Employee Benefits Executive Compensation, Securities Law and Fringe Benefit Update

Presented by the Subcommittees on Executive Compensation, Federal Securities Laws Issues and Fringe Benefits

CHAIRS/VICE-CHAIRS: Wayne R. Luepker, Mayer Brown LLP, Chicago, IL; Althea R. Day, Morgan Lewis & Bockius LLP, Washington, DC; Susan J. Daley, Perkins Coie LLP, Chicago, IL; Gail W. Stewart, Baker Botts LLP, Houston, TX; Avery E. Neumark, Rosen Seymour Shapps Martin & Company LLP, New York, NY; Adam B. Cohen, Sutherland Asbill & Brennan LLP, Washington, DC; William Hansen, McDermott Will & Emery LLP, Washington, DC (*Young Lawyer Liaison*); Kevin Burch, Holme Roberts & Owen LLP, Denver, CO (*Young Lawyer Liaison*)

The subcommittees will be discussing issues on executive compensation disclosure, application of section 409A, enforcement initiatives and other developments in executive compensation, securities law and fringe benefits areas.

**8:30AM – 10:15AM**

Salon III, Lobby Level, Ritz

Employee Benefits Welfare Benefits Design, Funding and Regulation Update

Presented by the Subcommittees on Welfare Plan Design and Funding, Cafeteria Plans and Reimbursement Accounts and HIPAA, COBRA & State Insurance Regulation of Welfare Plans

CHAIRS/VICE-CHAIRS: Andy R. Anderson, Morgan Lewis & Bockius LLP, Chicago, IL; Alden J. Bianchi, Mintz Levin Cohn Ferris Glovsky and Popeo PC, Boston, MA; Phyllis C. Borzi, O'Donoghue & O'Donoghue LLP, Washington, DC; Julie Burbank, Trucker Huss PC, San Francisco, CA; Nancy K. Campbell, Snell & Wilmer LLP, Phoenix, AZ; Mark L. Stember, Kilpatrick Stockton LLP, Washington, DC; George L. Whitfield, Warner Norcross & Judd LLP, Grand Rapids, MI; Dana L. Goldblatt, Caplin & Drysdale Chartered, Washington, DC (*Young Lawyer Liaison*)

This session will cover recent regulatory and legislative developments for health and welfare plans, including recent developments in health savings accounts and state health benefits legislation.

8:30AM – 11:30AM

Casablanca A, Loews

Estate & Gift Taxes 

CHAIR: John Bergner, Winstead PC, Dallas, TX

8:30am Opening Remarks by the Chair. 

8:35am **Recent Developments.** This panel will discuss recent developments in estate and gift tax planning and administration.

PANELISTS: Catherine V. Hughes, Attorney-Advisor, Office of Tax Policy, Department of Treasury, Washington, DC; Benjamin Carter, Winstead PC, Dallas, TX.

9:15am **529 Plans: Extra Credit for the Estate Planning Attorney.**

SPEAKERS: Christopher E. Houston, Ropes & Gray LLP, Boston, MA; Sarah M. Johnson, Venable LLP, Washington, DC.

10:00am **Estate Planning for Lottery and Other Winners.**

SPEAKERS: Judith Tobey, Hughes & Luce LLP, Dallas, TX; Russell W. Hall, Russell W. Hall & Associates PC, Bellaire, TX.

10:45am **Gift and Estate Tax Consequences of DING Trusts.**

SPEAKER: Stephen F. Lappert, Carter Ledyard & Milburn LLP, New York, NY.

8:30AM – 4:15PM

Salon II, Lobby Level, Ritz

Exempt Organizations  

CHAIR: Michael A. Clark, Sidley Austin LLP, Chicago, IL

8:30am **News from the IRS and Department of Treasury.** Representatives from the Tax Exempt/Government Entities Division of IRS and from the Department of Treasury will speak on recent developments and pending guidance.

MODERATOR: Frederick J. Gerhart, Dechert LLP, Philadelphia, PA.



PROGRAM SCHEDULE
FRIDAY, JANUARY 18 · AM

- PANELISTS:** Lois G. Lerner, Director, Exempt Organizations, IRS, Washington, DC; Catherine E. Livingston, Assistant Chief Counsel, Tax Exempt/Government Entities, IRS, Washington, DC; Eric A. San Juan, Deputy Tax Legislative Counsel (Tax Legislation), Office of Tax Policy, Department of Treasury, Washington, DC.
- 9:30am Form 990 Update.** A panel discussion of the new IRS draft form 990, highlighting changes from the June 14, 2007 draft and analyzing implementation issues.
MODERATOR: Ralph DeJong, McDermott Will & Emery LLP, Chicago, IL.
PANELISTS: Ronald J. Schultz, Senior Technical Advisor to the Commissioner, Tax Exempt/Government Entities, IRS, Washington, DC; Beth Kingsley, Harmon Curran Spielberg & Eisenberg LLP, Washington, DC; Lauren Mack, Sonnenschein Nath & Rosenthal LLP, San Francisco, CA; Douglas M. Mancino, McDermott Will & Emery LLP, Los Angeles, CA.
- 10:30am Election Year Issues, as Seen by the IRS, the FEC and the Rest of Us.** This panel will discuss current guidance and issues regarding lobbying and political activities.
MODERATOR: Professor Miriam Galston, George Washington University Law School, Washington, DC.
PANELISTS: Judith Kindell, Senior Technical Advisor to the Director, Exempt Organizations, IRS, Washington, DC; Craig Engle, Arent Fox LLP, Washington, DC; James P. Joseph, Arnold & Porter LLP, Washington, DC.
- 11:30am Endowment and Investment Issues.** This panel will discuss issues regarding the management of endowment funds, including proposals with respect to the tax treatment of hedge fund investments.
MODERATOR: Suzanne Ross McDowell, Steptoe & Johnson LLP, Washington, DC.
PANELISTS: Bill Bowers, Senior Counsel, Office of Tax Policy, Department of Treasury, Washington, DC; David Shevlin, Simpson Thacher & Bartlett LLP, New York, NY; Carolyn M. Osteen, Ropes & Gray LLP, Boston, MA.
- 12:45pm Luncheon.** 🎫 *(Ticketed Event)*
SPEAKER: Rev. J. Edwin Bacon Jr., All Saints Church, Pasadena, CA.
TOPIC: A Church's Perspective on Enforcement of the Political Campaign Proscription
- 2:15pm FIN 48 Issues.** This panel will discuss the application of FIN 48 to the disclosure of contingent liabilities relating to tax exempt organizations, including unrelated business income issues and exemption issues.
MODERATOR: Elizabeth Mills, McDermott Will & Emery LLP, Chicago, IL.
PANELISTS: Rob Friz, PricewaterhouseCoopers LLP, Philadelphia, PA; Laura Kalick, BDO Siedman LLP, Washington, DC; Fred F. Murray, Grant Thornton LLP, Washington, DC.



- 3:15pm** **Circular 230, Tax Shelter Transactions and Preparer Penalties—What EO Practitioners Need to Know.** 🗣️ This panel will discuss the updated Circular 230 regulations and the preparer penalty standards under section 6694, as amended by the Small Business and Work Opportunity Tax Act of 2007.

MODERATOR: Michael A. Clark, Sidley Austin LLP, Chicago, IL.

SPEAKERS: Michael R. Chesman, Director, Office of Professional Responsibility, IRS, Washington, DC; Anita Soucy, Attorney-Advisor, Tax Legislative Counsel, Department of Treasury, Washington, DC; Brian C. Bernhardt, McGuireWoods LLP, Richmond, VA; Celia Roady, Morgan Lewis & Bockius LLP, Washington, DC.

- 4:15pm** **Cash Bar.** 🍷 **Salon I Foyer, Lobby Level, Ritz**

8:30AM – 11:30AM

Casablanca H, Loews

Individual and Family Taxation 🗣️

CHAIR: Professor Bryan T. Camp, Texas Tech University School of Law, Lubbock, TX

- 8:30am** **Opening Remarks by the Chair.** 🗣️

- 8:35am** **When Having Fun is Making Money: Taxation of Hobbies.** This panel will explore the rules associated with section 183, which allows taxpayers to deduct expenses associated with income from hobbies, but does not permit taxpayers to shelter non-hobby income when hobby expenses exceed hobby income.

MODERATOR: Professor Roberta Mann, Widener University School of Law, Wilmington, DE.

PANELISTS: Professor Christopher M. Pietruszkiewicz, Louisiana State University, Paul M. Hebert Law Center, Baton Rouge, LA; Andrew J. Keyso, Special Counsel to the Associate Chief Counsel (Income Tax & Accounting), IRS, Washington, DC.

- 10:15am** **When Making Money is Having Fun: Taxation of Gaming.** This panel will explore the rules associated with gaming activities with a focus on potential realization issues.

PANELISTS: Professor Bryan T. Camp, Texas Tech University School of Law, Lubbock, TX; Professor Theodore Seto, Loyola Law School, Los Angeles, CA.

8:30AM – 11:30AM

Casablanca D, Loews

Real Estate 🗣️

CHAIR: Kevin Thomason, Thompson & Knight LLP, Dallas, TX

- 8:30am** **Opening Remarks by the Chair.** 🗣️

- 8:35am** **Just What is “Real Property” for Tax Purposes?** This panel will describe and analyze the major distinctions among the meanings of the term “real property” for purposes of section 512 (Unrelated Trade or Business Income), section 856 (REITs), section 897 (FIRPTA) and section 1031 (Like Kind Exchanges).



PROGRAM SCHEDULE

FRIDAY, JANUARY 18 · AM

MODERATOR: David Miller, Ernst & Young LLP, Dallas, TX.

PANELISTS: Professor Bradley T. Borden, Washburn University School of Law, Topeka, KS; Roger Aksamit, Bracewell & Giuliani LLP, Houston, TX.

9:20am REIT Liquidations. This panel will explore the methods of effectuating, and the tax issues implicated in, the liquidation of REITs, both public and private, including 100-shareholder compliance, personal holding company issues, FIRPTA gain recognition and withholding for non-US investors and maintaining REIT compliance during the liquidation period.

MODERATOR: Peter J. Genz, King & Spalding LLP, Atlanta, GA.

PANELISTS: John Merrick, Special Counsel to the Associate Chief Counsel, Chief Counsel (International), IRS, Washington, DC; Brian S. Masterson, Venable LLP, Washington, DC.

9:55am Hot Planning Techniques Involving Leases. The panel will describe key tax planning techniques involving leases, including (i) the treatment of rent prepayments for tax purposes and the limits on the number of years for which rent can be prepaid, (ii) the use of leases to obtain state tax advantages and (iii) the structuring of a lease so that it does not “cross the line” and become a current sale for tax purposes.

MODERATOR: Jill Darrow, Katten Muchin Rosenman LLP, New York, NY.

PANELISTS: Carolyn Joy Lee, Jones Day, New York, NY; Joseph Lipari, Roberts & Holland LLP, New York, NY; Kevin Anderson, BDO Seidman LLP, Bethesda, MD.

10:20am Troubled Like Kind Exchanges. Has your intended like kind exchange gone awry? Is your qualified intermediary disappearing? This panel will focus on cutting edge techniques for dealing with these and other issues that have recently arisen in connection with troubled section 1031 exchanges.

MODERATOR: Robert D. Schachat, Ernst & Young LLP, Washington, DC.

PANELIST: Louis Weller, Deloitte Tax LLP, San Francisco, CA.

10:45am Doing Deals with Funds and REITs Part I. This panel, as well as a companion panel to be presented in the afternoon by the Partnerships & LLCs Committee, will focus on the business, REIT and other tax issues faced by a modest-sized regional real estate company that has been approached by a REIT and/or a fund with tax-exempt and foreign investors. Potential negotiation strategies that may be employed by the real estate company will also be discussed. This panel will focus on the business and REIT-specific issues involved in such negotiations.

MODERATOR: Darryl Steinhouse, Luce Forward Hamilton & Scripps LLP, San Diego, CA.


PANELISTS: Jim Lowy, Ernst & Young LLP, San Francisco, CA; Leslie H. Loffman, DLA Piper LLP, New York, NY; James H. Lokey, King & Spalding LLP, Atlanta, GA.

**8:30AM – 12:30PM**

Kenitra A&B, Loews

S Corporations 

CHAIR: Carol Kulish Harvey, KPMG LLP, Washington, DC

- 8:30am** Opening Remarks and Report on Committee Business by the Chair. 
- 8:40am** **Important Developments.** Discussion of recent legislative, administrative and judicial developments relating to S corporations and their shareholders, including a discussion of provisions relevant to S corporations in the Tax Reduction and Reform Act of 2007, introduced by Charles Rangel (D-NY), the Chairman of the House Committee on Ways and Means.
MODERATOR: Laura Howell-Smith, Deloitte Tax LLP, Washington, DC.
- 9:30am** **Recent Developments Regarding Estate Planning for Shareholders of S Corporations.**
MODERATOR: Laura Howell-Smith, Deloitte Tax LLP, Washington, DC.
PANELIST: Jeanne L. Newlon, Venable LLP, Washington, DC.
- 10:00am** **Recent Developments in State and Local Taxation of S Corporations.** A discussion of recent developments in state and local taxation relevant to S corporations, including states that require withholding on nonresident shareholders, state treatment of Qualified Subchapter S Subsidiaries and single-member limited liability companies, state recognition of section 338(h)(10) elections, sales of S corporation stock by nonresidents and availability of credits for taxes paid to another state.
MODERATOR: Stephen Nechemias, Taft Stettinius & Hollister LLP, Cincinnati, OH.
PANELIST: David E. Kahen, Roberts & Holland LLP, New York, NY.
- 10:45am** **Limited Liability Companies Classified as S Corporations – Part II.** Continuation of discussion from 2007 May Meeting in Washington, DC, along with discussion of form of operating agreement for Delaware LLC that elects S corporation status.
MODERATOR: Ronald Levitt, Sirote & Permutt PC, Birmingham, AL.
PANELISTS: Steven Klein, Sher Garner Cahill Richter Klein McAlister & Hilbert LLC, New Orleans, LA; Stephen R. Looney, Dean Mead Egerton Bloodworth Capouano & Bozarth PA, Orlando, FL; Christopher R. D'Amico, Dean Mead Egerton Bloodworth Capouano & Bozarth PA, Orlando, FL.
- 11:30am** **Built-In Gains Tax – Planning Considerations.** A discussion with members of the Committee regarding selected built-in gains tax issues and a paper on the subject.
MODERATORS: Professor Lorence Bravenec, Texas A&M University, Mays Business School, College Station, TX; Professor Fred Feucht, Prairie View A&M, Prairie View, TX.



PROGRAM SCHEDULE

FRIDAY, JANUARY 18 · AM

8:30AM – 10:30AM

Salon I, Lobby Level, Ritz

US Activities of Foreigners and Tax Treaties ★

CHAIR: William S. Dixon, Citigroup Global Markets Inc, New York, NY

- 8:30am** **Section 7874 and Inversions: News, Policy and Technicals.** ★ The panel will discuss many of the news events of 2007 pertinent to section 7874 and so-called “inversion” transactions evidenced in the marketplace. The panel will also consider the recurring policy themes associated with various transactions as well as a select list of practical technical related questions that warrant administrative guidance.

MODERATOR: William S. Dixon, Citigroup Global Markets Inc, New York, NY.

PANELISTS: Peter Blessing, Sherman & Sterling LLP, New York, NY; Jose Murillo, Taxation Specialist, Department of Treasury, Washington, DC; Karen Gilbreath Sowell, Deputy Assistant Secretary (Tax Policy), Department of Treasury, Washington, DC; Edward Tanenbaum, Alston & Bird LLC, New York, NY.

- 9:30am** **Tax Treaty Medley: Canada, Germany and Iceland.** ★ The panel will identify and discuss a handful of interesting and important themes and issues present in the recently announced income tax treaties or protocols, as applicable with Canada, Germany and Iceland

MODERATOR: Kimberly Blanchard, Weil Gotshal & Manges LLP, New York, NY.

PANELISTS: Bruce Cohen, American International Group Inc, New York, NY; John Harrington, International Tax Counsel, Department of Treasury, Washington, DC; Michael Mundaca, Deputy Assistant Secretary (Tax Policy), Department of Treasury, Washington, DC.

9:00AM – 10:00AM

Safi, Loews

Distinguished Service Award (*Executive Session*)

CHAIR: Kenneth W. Gideon, Skadden Arps Slate Meagher & Flom LLP, Washington, DC

9:00AM – 12:00PM

Deserto & Lago, Garden Level, Ritz

Young Lawyers Forum – 2007 Law Student Tax Challenge ★

Semi-Final Rounds (*Open to the Public*)

Six teams of JD semi-finalists, selected for their written submissions, will compete before a panel of judges who will role-play as a “client” and then as “senior partner” in a firm. The two-member teams present their solutions to the tax planning problem and, based on their oral presentations, will be selected to compete in the afternoon final rounds.



9:15AM – 10:15AM

Olive Grove, Garden Level, Ritz

Employee Benefits ESOP Update

Presented by the Subcommittee on ESOPs

CHAIR/VICE-CHAIR: Gregory K. Brown, Katten Muchin Rosenman LLP, Chicago, IL; W. Walden Lloyd, Callister Nebeker & McCullough PC, Salt Lake City, UT

This session will cover recent legislative changes, recent litigation and recent IRS and Department of Labor rulings and interpretations concerning ESOPs.

9:30AM – 12:30PM

Casablanca G, Loews

Investment Companies 

CHAIR: Deanna Flores, Havertown, PA

9:30am Opening Remarks by the Chair. 

9:35am **Organization for Economic Co-operation and Development (OECD) Task Force on Taxation of Collective Investment Schemes under OECD Model Treaty: Potential Impact of Recommendations on RICs and REITs.** This panel will discuss the ongoing efforts of the OECD to address the taxation of collective investment schemes within OECD member countries and procedures for tax relief for cross-border investors.

MODERATOR: Keith Lawson, Investment Company Institute, Washington, DC.

PANELISTS: Patricia A. Brown, Centre for Tax Policy and Administration, Organisation for Economic Co-operation and Development, Washington, DC; Chris Gilbert, JPMorgan Chase Bank NA, Bournemouth, UK; Tony Edwards, National Association of Real Estate Investment Trusts, Washington, DC.

10:35am **Living with FIN 48: Practical Application to Uncertain Tax Positions, Return Preparer Penalties and Work Product Privilege.** This panel will explore a variety of issues presented by the application of FIN 48 to investment companies, including whether different taxpayers could reasonably adopt different “more likely than not” tax positions for the same tax issue.

MODERATOR: Gwen Shaneyfelt, Franklin Templeton Investments, Ft. Lauderdale, FL.

PANELISTS: David Shapiro, Senior Counsel (Financial Products - Domestic & International), Department of Treasury, Washington, DC; Dale Collinson, KPMG LLP, Washington, DC.

11:30am **The Proliferation of Investment Structures: Where Are We Today and Where Are We Going?** This panel will discuss latest developments impacting the industry. We will scrutinize the recent output from the Department of Treasury and Capitol Hill on including exchange traded notes. We will also analyze the carried interest controversy and the effect of the paid preparer penalties on the atmosphere in which we operate.



PROGRAM SCHEDULE FRIDAY, JANUARY 18 · AM

MODERATOR: Viva Hammer, Crowell & Moring LLP, New York, NY.

PANELISTS: John Rogers III, Senior Attorney, Office of Chief Counsel (Financial Institutions & Products), IRS, Washington, DC; Robert Dilworth, McDermott Will & Emery LLP, Washington, DC; Allison Rosier, PricewaterhouseCoopers LLP, New York, NY.

10:15AM – 11:15AM

Vineyard, Garden Level, Ritz

Employee Benefits Contingent Workforce Update

Presented by the Subcommittee on Controlled Groups, Affiliated Service Groups and Employee Status

CHAIRS: Peter J. Hunt, Pillsbury Winthrop Shaw Pittman LLP, New York, NY; Norman J. Misher, Roberts & Holland LLP, New York, NY; Daniel L. Morgan, Dickstein Shapiro LLP, Washington, DC

This session will review recent court decisions and regulatory developments regarding worker classification, controlled group determinations and employee benefits for contingent workers.

10:15AM – 12:00PM

Orchard, Garden Level, Ritz

Employee Benefits Defined Contribution Plans/Electronic Plan Administration Update

Presented by the Subcommittee on Defined Contribution Plans and Task Force on Electronic Plan Administration/Vendor Management

CHAIRS/VICE-CHAIRS: Leonard S. Hirsh, Ernst & Young LLP, New York, NY; Bernard F. O'Hare, Patterson Belknap Webb & Tyler LLP, New York, NY; Danny A. Martin Jr., Shell Oil Company, Houston, TX; Gary J. Chase, Roberts & Holland LLP, New York, NY (*Young Lawyer Liaison*)

This meeting will review issues under the proposed IRS regulations relating to automatic contribution arrangements and the final Department of Labor regulations relating to qualified default investment alternatives. In addition, the meeting will examine other recent regulatory and legislative activity affecting section 401(k) plans and other defined contribution plans, including issues regarding fee disclosure under 401(k) plans. Recent developments in electronic plan administration and vendor management also will be covered.

10:15AM – 12:00PM

Montelago I, Garden Level, Ritz

Employee Benefits Fiduciary Responsibility and Litigation Update

Presented by the Subcommittees on Fiduciary Responsibility/Plan Investments, Litigation and ESOPs

CHAIRS/VICE-CHAIRS: Gregory K. Brown, Katten Muchin Rosenman LLP, Chicago, IL; W. Walden Lloyd, Callister Nebeker & McCullough PC, Salt Lake City, UT; Susan Katz Hoffman, Littler Mendelson PC, Philadelphia, PA; Joni L. Andrioff, Jones Day Reavis & Pogue, Chicago, IL; Andrew Oringer, White & Case LLP, New York, NY; Robert F. Pizzo, Law Offices of Robert F. Pizzo, Rochester, NY; Tiffany E. Walker, Haynes and Boone LLP, Dallas, TX (*Young Lawyer Liaison*); Lisa J. Bleier, American Bankers Association, Washington, DC (*Young Lawyer Liaison*)

PROGRAM SCHEDULE

AM · FRIDAY, JANUARY 18



The subcommittees will review cases and legislative and regulatory developments of current interest.

10:30AM – 11:30AM

Agadir B, Loews

In-House Counsel Roundtable 🗣️ (*Executive Session*)

Discussion of important developments and opportunity to share and discuss best practices with other in-house tax attorneys.

SPONSORED BY: State & Local Taxes

10:30AM – 12:00PM

Salon I, Lobby Level, Ritz

Joint Session of FAUST, USAFTT, Transfer Pricing and FLF: Important Developments

The panel will discuss numerous recent developments concerning international tax rules and the recently passed Canadian Tax Treaty.

MODERATOR: Jennifer Molnar, Sutherland Asbill & Brennan LLP, Washington, DC.

PANELISTS: Elinore Richardson, Borden Ladner Gervais LLP, Toronto, ON; William Chip, Covington & Burling LLP, Washington, DC; David Bowen, Grant Thornton LLP, Washington, DC; Michael DiFronzo, Deputy Associate Chief Counsel (International), IRS, Washington, DC; John Harrington, International Tax Counsel, Department of Treasury, Washington, DC; Steven Musher, Associate Chief Counsel (International), IRS, Washington, DC; Alan Appel, Bryan Cave LLP, New York, NY.

11:00AM – 1:00PM

Marssa Restaurant, Loews

Companions' Activity: Cooking Demo with Master Sushi Chef & Luncheon 🗣️ (*Ticketed Event*)

See p. 58 for a full description.

11:00AM – 1:00PM

Tangier, Loews

Tax Shelters 🗣️

CHAIR: Julian Kim, Latham & Watkins LLP, Washington, DC

11:15AM – 12:15PM

Salon IV, Lobby Level, Ritz

Employee Benefits EEOC Issues/Military and Other Leaves Update

Presented by the Subcommittee on EEOC Issues/FMLA, Military and Other Leaves

CHAIRS: Thomas R. Standley, Marathon Oil Company, Findlay, OH; Thomas C. Graves, Stinson Morrison Hecker LLP, Kansas City, MO

The program will focus on recent EEOC developments affecting benefit plans. The program will also discuss recent developments impacting individuals on military and other types of leaves.

11:30AM – 12:30PM

Rabat A, Loews

Appointments to the Tax Court 🗣️ (*Executive Session*)

CHAIR: Robert T. Duffy, Kirkpatrick Stockton LLP, Charlotte, NC



PROGRAM SCHEDULE FRIDAY, JANUARY 18 · PM

COMMITTEE LUNCHEONS

12:00PM – 1:30PM

Casablanca C, Loews

Corporate Tax and Affiliated & Related Corporations 🕒 (Ticketed Event)

SPONSORED BY: Baker & McKenzie LLP

12:00PM – 1:30PM

Salon I, Lobby Level, Ritz

FAUST, FLF, Transfer Pricing and USAFTT 🕒 (Ticketed Event)

12:30PM – 1:30PM

Casablanca E, Loews

Administrative Practice and Court Procedure & Practice 🕒 (Ticketed Event)

12:30PM – 1:30PM

Casablanca F, Loews

Banking & Savings Institutions, Financial Transactions, Insurance Companies, Investment Companies and Tax Exempt Financing 🕒 (Ticketed Event)

SPEAKER: Richard M. Lipton, Baker & McKenzie LLP, Chicago, IL

12:30PM – 1:30PM

Safi, Loews

Business Cooperatives & Agriculture 🕒 (Ticketed Event)

12:30PM – 1:30PM

Casablanca B, Loews

Civil and Criminal Tax Penalties 🕒 (Ticketed Event)

SPONSORED BY: Taggart and Hawkins, A Professional Corporation

12:30PM – 1:30PM

Casablanca A, Loews

Estate & Gift Taxes and Fiduciary Income Tax 🕒 (Ticketed Event)

12:30PM – 1:30PM

Casablanca D, Loews

Partnerships & LLCs and Real Estate ★ 🕒 (Ticketed Event)

SPEAKER: Karen Gilbreath Sowell, Deputy Assistant Secretary (Tax Policy), Department of Treasury, Washington, DC

SPONSORED BY: J.P. Morgan Property Exchange, Inc.

12:30PM – 1:00PM

Casablanca H, Loews

State and Local Taxes 🕒 (Ticketed Event)

12:45PM – 2:00PM

Salon II, Lobby Level, Ritz

Exempt Organizations 🕒 (Ticketed Event)

SPEAKER: Rev. J. Edwin Bacon Jr., All Saints Church, Pasadena, CA

TOPIC: A Church's Perspective on Enforcement of the Political Campaign Proscription



12:00PM – 1:15PM

Orchard, Garden Level, Ritz

Employee Benefits International Update

Presented by the Subcommittee on Foreign and International Issues

CHAIRS/VICE-CHAIRS: Russell E. Hall, Towers Perrin, Valhalla, NY; Andrew C. Liazos, McDermott Will & Emery LLP, Boston, MA; Mark C. Jones, Pillsbury Winthrop Shaw & Pittman LLP, New York, NY (*Young Lawyer Liaison*)

The subcommittee will discuss (i) legislative proposals to tax certain foreign nonqualified deferred compensation (e.g., H.R. 3996), (ii) the current guidance applicable under section 409A(b) to offshore funding arrangements and specific practices that might be subject to these rules and (iii) roundtable discussion of experiences working with the 409A international rules in practice.

12:00PM – 1:00PM

Fez A, Loews

Membership and Marketing 

CHAIR: Stuart M. Lewis, Buchanan Ingersoll & Rooney PC, Washington, DC

12:15PM – 1:15PM

Village Boardroom, Garden Level, Ritz

Employee Benefits Young/New Lawyers in Employee Benefits Forum ★

Presented by the Young Lawyers in Employee Benefits Forum

CHAIRS: Gary J. Chase, Roberts & Holland LLP, New York, NY; William Hansen, McDermott Will & Emery LLP, Washington, DC

The forum will present a discussion on issues affecting young employee benefit lawyers when drafting amendments to 401(k) plans to include Roth provisions. Time permitting, the forum will also review the opportunities available to young and other new lawyers to increase their understanding of, and involvement in, the Employee Benefits Committee.

1:00PM – 1:30PM

Casablanca H, Loews

State and Local Taxes: A Review of Recent State & Local Tax Developments 

MeadWestvaco Corp. v. Illinois – Sourcing the Gain (Loss) From Sale of a Business. The US Supreme Court has agreed to hear the taxpayer's appeal in *MeadWestvaco Corp. v. Illinois* involving whether Illinois can tax a non-domiciliary company's gain from the sale of a business. This case will address critical issues involving whether the gain from the sale of a business generates apportionable or allocable income.

MODERATOR: Michael McLoughlin, Morrison & Foerster LLP, New York, NY.

SPEAKER: Paul H. Frankel, Morrison & Foerster LLP, New York, NY.



PROGRAM SCHEDULE

FRIDAY, JANUARY 18 · PM

1:15PM – 2:30PM

Vineyard, Garden Level, Ritz

Employee Benefits Distributions Update

Presented by the Subcommittee on Distributions

CHAIRS/VICE-CHAIR: Mark A. Bodron, Baker Botts LLP, Houston, TX; Linda Griffey, O'Melveny & Meyer LLP, Los Angeles, CA; Jose Juan Valcarce, Shell Oil Company, Houston, TX (*Young Lawyer Liaison*)

The session will discuss IRS and Department of Labor regulatory developments and recent decisions regarding qualified plan distributions (including QDROs), as well as other items of interest to those in attendance.

1:15PM – 2:30PM

Salon IV, Lobby Level, Ritz

Employee Benefits Government and Tax Exempt Plans Update

Presented by the Subcommittee on Exempt Organization and Governmental Plans

CHAIRS: Amy A. Null, Wilmer Cutler Pickering Hale & Dorr LLP, Boston, MA; Michael A. Laing, Taft Stettinius & Hollister LLP, Cincinnati, OH; Robert Abramowitz, Morgan Lewis & Bockius LLP, Philadelphia, PA

The subcommittee will review current developments/guidance for governmental and tax exempt employers.

1:15PM – 2:30PM

Salon III, Lobby Level, Ritz

Employee Benefits Mergers and Acquisitions Update

Presented by the Subcommittee on Mergers and Acquisitions

CHAIRS/VICE-CHAIR: Susan A. Wetzel, Haynes and Boone LLP, Dallas, TX; Christine L. Richardson, Pillsbury Winthrop Shaw Pittman LLP, San Francisco, CA; Robert Miller, Caffee Halter & Griswold LLP, Cleveland, OH; Jennifer M. Wolff, Weil Gotshal & Manges LLP, New York, NY (*Young Lawyer Liaison*)

This session will feature a potpourri of M&A issues, including disclosure of employee data, benefit restrictions in under funded defined benefit plans, the new cafeteria plan proposed regulations and an update on recent case law. We will also discuss the related impact of these issues on benefits due diligence, as well as on representations, warranties and covenants.

1:15PM – 2:30PM

Orchard, Garden Level, Ritz

Employee Benefits Pension Legislation Update

Presented by the Subcommittee on Pension Legislation

CHAIRS/VICE-CHAIR: Keith Mong, Buchanan Ingersoll & Rooney PC, Washington, DC; David N. Levine, Groom Law Group Chartered, Washington, DC; James W. Thweatt III, Keating Muething & Klekamp PLL, Cincinnati, OH (*Young Lawyer Liaison*)

We will discuss recent legislative developments, including (to the extent applicable) technical corrections to the Pension Protection Act of 2006, \$1 million cap on deferred compensation and the expansion of covered employees under Code section 162(m).

**1:30PM – 2:30PM**

Kenitra A, Loews

Court Procedure and Practice Roundtable Discussion  ★

Issues in Forum Selection (*Co-Sponsored by Young Lawyers Forum*).

This panel will discuss issues that arise in advising a client to litigate a tax matter in the Tax Court, Court of Federal Claims or Federal District Court. The panel will consider the issues of precedent, discovery procedures, pre-payment or post-payment, availability of a jury and other issues related to choice of forum.

MODERATOR: Professor Christopher M. Pietruszkiewicz, Louisiana State University, Paul M. Hebert Law Center, Baton Rouge, LA.

PANELISTS: Christopher S. Rizek, Caplin & Drysdale Chartered, Washington, DC; Peter K. Reilly, Special Counsel (Tax Practice and Procedure), IRS, Washington, DC; Charles E. Hodges II, Chamberlain Hrdlicka White Williams & Martin PC, Atlanta, GA.

1:30PM – 4:30PM

Fez B, Loews

Employment Taxes 

CHAIR: Thomas H. Meyerer, Ernst & Young LLP, Washington, DC

1:30pm Opening Remarks by the Chair. 

1:35pm Update from the Executive Branch and Private Practitioners on **Emerging Employment Tax Issues**. A panel of government representatives and private practitioners will discuss the most recent significant developments affecting employment taxes with a focus on their practical implications. The discussion will include the appropriateness of any actions to be taken by the Committee in response to those developments.

MODERATOR: Thomas H. Meyerer, Ernst & Young LLP, Washington, DC.

PANELISTS: Margaret A. Owens, Assistant Branch Chief, Employment Tax, Branch 1, IRS, Washington, DC; Anita Bartels, Senior Program Analyst, Employment Tax, IRS, Maitland, FL; Thomas M. Cryan, Deloitte Tax LLP, Washington, DC.

2:15pm **Protection from Third Party Payers Misappropriation and Employment Tax Consequences of Such Actions for the In-Home Care Service Recipients (HCSRs)**. The National Taxpayer Advocate will lead an interactive discussion of the most serious problems and key legislative recommendations included in the FY 2007 National Taxpayer Advocate Annual Report to Congress, related to small business setbacks resulting from third party payroll agents (TPPAs) misappropriation of client employers' funds intended to be used for the payment of employment taxes and employment tax consequences of such TPPA actions for the elderly and disabled in-home care service recipients (HCSRs). Issues to be discussed include absence of TPPA definition and classification, common law employer ultimate liability



PROGRAM SCHEDULE

FRIDAY, JANUARY 18 · PM

for the payment of the payroll taxes and Taxpayer Advocate efforts to resolve systemic problems associated with the TPPAs and HCSRs.

MODERATOR: Jeffrey H. Schechter, Cole Schotz Meisel Forman & Leonard PA, Hackensack, NJ.

PANELISTS: Nina Olson, National Taxpayer Advocate, IRS, Washington, DC; Rosty Shiller, Attorney-Advisor, Taxpayer Advocate Service, IRS, Washington, DC.

3:00pm

Employment Tax Aspects of the Gaming Industry. Issues to be discussed include worker classification, proper work visas, reporting and recordkeeping requirements of casinos, internet gaming entities and Indian Tribal Government operations.

MODERATOR: Edward J. Leyden, Hollrah Leyden LLC, Washington, DC.

PANELISTS: Mary C. Gorman, Assistant Division Counsel, Small Business/Self-Employed, IRS, Lanham, MD; Gary Erlich, Catania Consulting, North Haledon, NJ; Mary Angelbeck, Ernst & Young LLP, Philadelphia, PA.

3:30pm

Tip Reporting Update. This panel will focus on all aspects of tips reporting with an emphasis on the gaming industry and on the restaurant and beverage industry.

MODERATOR: Deborah J. Spyker, Ernst & Young LLP, Denver, CO.

PANELISTS: Mary C. Gorman, Assistant Division Counsel, Small Business/Self Employed, IRS, Lanham, MD; Daniel Lauer, National Tip Income Reporting Compliance Program Manager, IRS, Grand Rapids, MI; Tammy Wise, National Tip Reporting Compliance Gaming Analyst, IRS, Las Vegas, NV; Ida Volz, National Tip Reporting Compliance Program Food & Beverage Analyst, Grand Rapids, MI; Shawn T. Sani, MGM Mirage, Las Vegas, NV; Marianna G. Dyson, Miller & Chevalier Chartered, Washington, DC.

1:30PM – 2:30PM

Rabat A, Loews

Estate & Gift Taxes and Fiduciary Income Tax Young Lawyers Subcommittee ★ 

**1:30PM – 3:30PM**

Salon I, Lobby Level, Ritz

Foreign Lawyers Forum 

CHAIR: Friedhelm Jacob, Hengeler Mueller, Frankfurt, Germany

1:30pm Opening Remarks by the Chair. 

1:35pm **Comparative Anti-Avoidance Developments: Is a Common Standard Emerging?** This panel will examine comparative anti-avoidance developments in the US, UK, Germany and other countries. It will review developments in areas including arbitrage, transaction disclosure rules, advisor-focused rules, statutory and judicial anti-abuse law, enforcement and tax minimization through the use of the low tax jurisdictions (including German proposals relating to business restructurings and UK proposals regarding CFC reforms). The panel will probe the extent to which the developments reviewed suggest that common global standards are emerging.

MODERATOR: Philip R. West, Steptoe & Johnson LLP, Washington, DC.**PANELISTS:** Tom Akin, McCarthy Tétrault LLP, Toronto, ON; Professor Reuven Avi-Yonah, University of Michigan Law School, Ann Arbor, MI; Mark Baldwin, Macfarlanes, London, England; Alice Niemann, Max Planck Institute for Intellectual Property Competition and Tax Law, Munich, Germany.

2:30pm **Tax Incentives Under Attack! – Which Shall Live and Which Shall Die?** This panel will consider a number of beneficial tax regimes such as the Dutch interest box, the Luxembourg SICAR and securitization vehicle regimes and will alert tax practitioners whether these regimes are moribund due to challenges such as illicit state aid. We will also consider the UK consultative paper as it considers a change from a foreign tax credit to an exemption regime and discuss this against the background of the EU Commission's activities for the introduction of a Common Consolidated Corporate Tax Base (CCCTB).

MODERATOR: Werner Heyvaert, Stibbe, Brussels, Belgium.**PANELISTS:** Michel Collet, CMS Bureau Francis Lefebvre, Paris, France; Jean-Marc Groelly, NautaDutilh, Luxembourg, Luxembourg; Kassim Meghjee, Steptoe & Johnson LLP, London, England; Paul Steurink, De Brauw Blackstone Westbroek, Amsterdam, The Netherlands.



PROGRAM SCHEDULE

FRIDAY, JANUARY 18 · PM

1:30PM – 3:00PM

Rabat B, Loews

Teaching Taxation ★

CHAIR: Professor Leandra Lederman, Indiana University School of Law-Bloomington, Bloomington, IN

1:30pm Opening Remarks by the Chair. 

1:35pm Tax in the 21st Century: What's Blogging Got to Do with It? ★

Over the past few years, tax blogs have become a powerful force in the tax world. They serve as resources, provide an outlet for social commentary and advocacy and indeed help create and sustain the tax community. This panel will examine a number of different types of tax blogs and explore the various ways in which tax scholars and practitioners use blogs in their professional work.

MODERATOR: Professor Michael B. Lang, Chapman University School of Law, Orange, CA.

PANELISTS: Professor Linda M. Beale, Wayne State University Law School, Detroit, MI; Professor Neil H. Buchanan, George Washington University Law School, Washington, DC; Professor Paul Caron, University of Cincinnati College of Law, Cincinnati, OH; Donald L. Korb, Chief Counsel, Office of Chief Counsel, IRS, Washington, DC.

2:00PM – 5:00PM

Tangier, Loews

Nominating (*Executive Session*)

CHAIR: Dennis B. Drapkin, Jones Day, Dallas, TX

2:30PM – 5:30PM

Kenitra A, Loews

Bankruptcy and Workouts

CHAIR: Frances D. Sheehy, Law Office of Frances D. Sheehy, Coconut Creek, FL

2:30pm Opening Remarks by the Chair. 

2:35pm **Ramifications of COD in Business Bankruptcies and Workouts.** This panel will discuss COD, when it is realized, how it is computed and when it causes attribute reduction, as well as the planning opportunities and the pitfalls.

MODERATOR: George Nelson, Deloitte Tax LLP, Houston, TX.

PANELISTS: Milton Hyman, Irell & Manella LLP, Los Angeles, CA; Fred Witt, Deloitte Tax LLP, Phoenix, AZ.

4:00pm **Back to the Future – the World of Bankruptcy According to BAPCPA.** The speaker will discuss the judicial interpretation and development of case law since the overhaul of the Bankruptcy Act in 2005.

SPEAKER: Kenneth Weil, Kenneth C. Weil Law Office, Seattle, WA.

**2:30PM – 5:30PM**

Casablanca B, Loews

Closely Held Businesses ☞

CHAIR: William P. Prescott, Wickens Herzer Panza Cook & Batista Co, Avon, OH

2:30pm Buy-Sell Agreements for All Triggering Events – The Do's and Don'ts.

PANELISTS: Morton A. Harris, Hatcher Stubbs Land Hollis & Rothschild LLP, Columbus, GA; Alson R. Martin, Lathrope & Gage LC, Overland Park, KS; William P. Prescott, Wickens Herzer Panza Cook & Batista Co, Avon, OH.

4:10pm Asset Protection for “Real” People.

SPEAKERS: A. Thomas Skallas, Holland & Knight LLP, Chicago, IL; Ray Burgan, Gammage & Burnham PLC, Phoenix, AZ.

2:30PM – 5:30PM

Casablanca E, Loews

Court Procedure and Practice ☞

CHAIR: Lawrence M. Hill, Dewey & LeBoeuf LLP, New York, NY

2:30pm Opening Remarks by the Chair. ☞**2:35pm Remarks on Behalf of the Tax Court.**

SPEAKER: The Honorable John Colvin, Chief Judge, US Tax Court, Washington, DC.

2:45pm Selected Discovery Issues in Civil Tax Litigation. This panel of judges and practitioners will share their views on the applicability and effectiveness of various tools used during discovery in tax litigation, including requests for admissions, protective orders and privilege logs.

MODERATOR: Jonathan E. Strouse, Holland & Knight LLP, Chicago, IL.

PANELISTS: The Honorable Stephen J. Swift, Judge, US Tax Court, Washington, DC; The Honorable Francis M. Allegra, Judge, US Court of Federal Claims, Washington, DC; The Honorable George W. Foley, Magistrate Judge, US District Court for the District of Nevada, Las Vegas, NV; Peter K. Reilly, Special Counsel (Tax Practice and Procedure), IRS, Washington, DC.

3:35pm Remarks on Behalf of the Office of Chief Counsel, IRS.

SPEAKER: Deborah A. Butler, Associate Chief Counsel (Procedure and Administration), IRS, Washington, DC.

3:45pm Settling TEFRA Cases. This panel will address issues concerning the mechanics and strategies for settling partnership cases subject to the unified audit and litigation procedures under TEFRA, including which partners have the authority to settle the actions, the effect of settlements on other partners and other taxable years and the disposition of penalties and defenses thereto.



PROGRAM SCHEDULE

FRIDAY, JANUARY 18 · PM

- MODERATOR:** Mark Allison, Dewey & LeBoeuf LLP, New York, NY.
PANELISTS: Ronald Buch, McKee Nelson LLP, Washington, DC; Henry Schneiderman, Special Counsel to the Associate Chief Counsel (Procedure and Administration), IRS, Washington, DC.
- 4:15pm** **Spotlight on the Joint International Tax Shelter Information Center.**
MODERATOR: Todd Welty, Meadows Collier Reed Cousins & Blau LLP, Dallas, TX.
PANELIST: Tamara Ashford, Acting Director of JITSIC, IRS, Washington, DC.
- 4:35pm** **Managing Corporate Tax Litigation: The Role of In-House Counsel.**
This panel will discuss the preparation for and management of federal and state tax litigation by corporate taxpayers, with a focus on the role played by in-house tax counsel. The panel will address the following issues: document and e-mail retention; the impact of FIN 48 and *Textron* on potential litigation issues; legal hold orders; managing the discovery process; handling key executive witnesses and the role of in-house counsel at trial.
MODERATOR: Brian P. Kaufman, Capital One Financial Corporation, McLean, VA.
PANELISTS: Kathleen Dale, General Electric Company, Stamford, CT; Richard Nessler, Dewey & LeBoeuf LLP, New York, NY; Peter Lowy, Shell Oil Company, Houston, TX.
- 5:20pm** **Current Developments.**
SPEAKER: Rachel Partain, Dewey & LeBoeuf LLP, New York, NY.
- 2:30PM – 5:30PM** **MonteLago I&I, Garden Level, Ritz**
Employee Benefits 📺 🗣️
- CHAIR:** David Mustone, Hunton & Williams LLP, McLean, VA
- 2:30pm** **Opening Remarks by the Chair.** 🗣️
- 2:35pm** **Cash Balance Plan Developments.** This session will discuss recent regulatory/administrative developments concerning the hybrid plan provisions under the Pension Protection Act of 2006 and recent IRS developments in the determination letter process, including treatment of “greater of” formulas under the back-loading rules. Time permitting, recent litigation involving cash balance plans will also be discussed.
MODERATOR: David E. Gordon, Pearl Meyer & Partners, Los Angeles, CA.
PANELISTS: Alan Tawshunsky, Deputy Division Counsel/Deputy Associate Chief Counsel (Employee Benefits), IRS, Washington, DC; William Bortz, Associate Benefits Counsel, Office of Tax Policy, Department of Treasury, Washington, DC; Harlan Weller, Government Actuary, Office of Tax Policy, Department of Treasury, Washington, DC; Kyle Brown, Watson Wyatt Worldwide, Arlington, VA; Richard Shea, Covington & Burling LLP, Washington, DC.



3:30pm **Everyday Ethics: A Practical Guide for Employee Benefits Counsel.**
 ☞ This panel will address common ethical issues in the practice of employee benefits law. Topics to be addressed include privilege, audit and engagement letters, the permissible use of newsletters and multi-state practice considerations.
MODERATOR: John L. Utz, Utz Miller & Kuhn LLC, Overland Park, KS.
PANELISTS: Anne M. Meyer, Snell & Wilmer LLP, Phoenix, AZ; Bruce D. Pingree, Baker & Botts LLP, Dallas, TX; Martha N. Steinman, Dewey & LeBoeuf LLP, New York, NY.

4:30pm **Hot Employee Benefits Topics.** A discussion of late-breaking tax and ERISA developments, including the latest guidance under the Pension Protection Act of 2006.
MODERATOR: Priscilla Ryan, Sidley Austin LLP, Chicago, IL.
PANELISTS: W. Thomas Reeder, Benefits Tax Counsel, Department of Treasury, Washington, DC; Robert Doyle, Director, Office of Regulations and Interpretations, Employee Benefits Security Administration, Department of Labor, Washington, DC; Alan Tawshunsky, Deputy Division Counsel/Deputy Associate Chief Counsel (Employee Benefits), IRS, Washington, DC.

5:35pm **Government Guest Reception** **Montelago Foyer,
Garden Level, Ritz**
 and Cash Bar. ☞

2:30PM – 5:30PM

Casablanca G, Loews

Energy & Environmental Taxes ☞ ★

CHAIR: Stephen A. Lee, Crady Jewett & McCulley LLP, Houston, TX

2:30pm **Opening Remarks by Chair.** ☞

2:35pm **R&D Credit in the Energy Industry – Updates and Challenges.** This presentation will discuss recent developments in the R&D credit that are of particular interest to the energy industry.
MODERATOR: Samira A. Salman, Shell Oil Company, Houston, TX.
PANELISTS: Mickey Culpepper, Baker Hughes Incorporated, Houston, TX; David Paul, Honda of North America, Torrance, CA; David S. Hudson, Ernst & Young LLP, Washington, DC; Holly Martin, Ernst & Young LLP, Houston, TX.

3:30pm **The History and Development by the Supreme Court of the Mineral “Economic Interest” Doctrine for Federal Income Tax Purposes.** ★
 This presentation will trace the development of the “economic interest” doctrine as it applies to the taxation of mineral income and highlight some of the areas where this definition is critical.
MODERATOR: Robert A. Swiech, KPMG LLP, Houston, TX.



PROGRAM SCHEDULE
FRIDAY, JANUARY 18 · PM

4:30pm REIT Ownership of Transmission and Distribution Systems. The IRS ruled that a passive conduit system owned by a Real Estate Investment Trust qualified as a real estate asset in PLR 200725015. This panel will discuss this ruling and its application to passive utility systems, such as electric transmission and distribution systems, considering a more tax-efficient structure for the ownership of their utility assets.

MODERATOR: Todd Reinstein, Pepper Hamilton LLP, Washington, DC.

PANELIST: B. Benjamin Haas, Exelon Corporation, Philadelphia, PA.

2:30PM – 5:30PM

Casablanca C, Loews

Financial Transactions 

CHAIR: Jeff Maddrey, PricewaterhouseCoopers LLP, Washington, DC

2:30pm Structured Notes, Prepaid Forward Contracts and Exchange Traded Notes (ETNs): Where Do We Go From Here? This panel will discuss current issues in structured notes—legal form notes that provide the holder a return on its investment tied to the performance of one or more reference assets or risks. This panel will discuss tax characterization, timing, character and other issues under current law as well as tax policy considerations and will contrast the current treatment of investors in these products with the treatment for similar investments.

MODERATOR: Erika Nijenhuis, Cleary Gottlieb Steen & Hamilton LLP, New York, NY.

PANELISTS: Michael Farber, Davis Polk & Wardwell, New York, NY; Jeffrey D. Hochberg, Sullivan & Cromwell LLP, New York, NY; David Shapiro, Senior Counsel, Office of Tax Policy, Department of Treasury, Washington, DC.

4:00pm More Likely Than Not—Common Financial Transactions for Hedge Funds and Mutual Funds in a Section 6694 Disclosure World. This panel will discuss selected common fact patterns for funds that transact in securities and/or enter into derivatives. In some cases, financial products tax positions that are established and long-standing may require disclosure under the new regime.

MODERATOR: Allison Rosier, PricewaterhouseCoopers LLP, New York, NY.

PANELIST: Alan Munro, Ernst & Young LLP, Washington, DC.

4:45pm Update on Current Financial Products Issues. This panel will address current developments in financial products including PSB Holdings (section 265 as applied to financial institutions) and PLR 200742016 (debt-for-debt exchange).

MODERATOR: David Garlock, Ernst & Young LLP, Washington, DC.

PANELIST: Stephen Larson, Associate Chief Counsel (Financial Institutions and Products), IRS, Washington, DC.

**2:30PM – 5:30PM**

Kenitra B, Loews

Insurance Companies 

CHAIR: Kirk Van Brunt, Davis & Harman LLP, Washington, DC

- 2:30pm** **Opening Remarks by the Chair.** 
- 2:35pm** **Current Developments in Life Insurance Company and Product Taxation.** This panel will review significant developments during the past year, discussing significant published guidance, cases, PLRs/TAMs and IRS Business Plan items.
MODERATOR: Jean Baxley, Crowell & Moring LLP, Washington, DC.
PANELISTS: Mark Smith, Attorney-Advisor, Tax Legislative Counsel, Department of Treasury, Washington, DC; Susan Seabrook, Latham & Watkins LLP, Washington, DC.
- 3:05pm** **Defining Insurance for Tax Purposes.** This panel will focus on the definitions of “insurance” and “reinsurance” for tax purposes, with particular emphasis on recent IRS guidance, including Rev. Rul. 2007-4.
MODERATOR: Richard Bromley, Foley & Lardner LLP, Chicago, IL.
PANELISTS: Mark Smith, Attorney-Advisor, Tax Legislative Counsel, Department of Treasury, Washington, DC; Marc Oberholtzer, PricewaterhouseCoopers LLP, Philadelphia, PA.
- 4:00pm** **Proposed Intercompany Transaction Regulations and Captive Insurance.** This panel will address the recently proposed new inter-company transaction regulations dealing with insurance transactions within the consolidated group and their impact on captive insurance transactions.
MODERATOR: Frederick Krull, Ernst & Young LLP, Los Angeles, CA.
PANELISTS: Marc Countryman, Attorney-Advisor, Tax Legislative Counsel, Department of Treasury, Washington, DC; Mark Smith, Attorney-Advisor, Tax Legislative Counsel, Department of Treasury, Washington, DC; Andrew Dubroff, Ernst & Young LLP, New York, NY.
- 4:45pm** **Update on I-COLI.** This panel will review developments relating to Rev. Proc. 2007-61, including discussing its scope and recent audit activity relating to I-COLI.
MODERATOR: Susan Seabrook, Latham & Watkins LLP, Washington, DC.
PANELISTS: Mark Smith, Attorney-Advisor, Tax Legislative Counsel, Department of Treasury, Washington, DC; Lori Robbins, Latham & Watkins LLP, Washington, DC.



PROGRAM SCHEDULE

FRIDAY, JANUARY 18 · PM

2:30PM – 5:30PM

Casablanca D, Loews

Partnerships & LLCs

CHAIR: Eric Sloan, Deloitte Tax LLP, New York, NY

- 2:30pm** **Opening Remarks by the Chair.** 
- 2:35pm** **Doing Deals with Funds and REITs Part II.** This panel, which is a continuation of the discussion begun by the Real Estate Committee, will discuss the business and tax issues specific to real estate funds (as opposed to REITs), focusing on the issues associated with fund structures.
MODERATOR: Michael Frankel, Ernst & Young LLP, Dallas, TX.
PANELISTS: Steven G. Frost, Chapman & Cutler LLP, Chicago, IL; Donna Maimin, Tishman Speyer, New York, NY.
- 3:15pm** **New Regulations on Partnership Mergers and the Mixing Bowl Rules.** The panel will discuss the proposed partnership merger regulations issued in August 2007 and effective for distributions after January 19, 2005. The new regulations dictate when a new seven-year mixing bowl clock will start after an “assets-over” partnership merger. This controversial issue was first raised in Rev. Rul. 2004-43.
MODERATOR: Blake D. Rubin, McDermott Will & Emery LLP, Washington, DC.
PANELISTS: Beverly Katz, Senior Technician Reviewer, Office of Chief Counsel, IRS, Washington, DC; Christopher S. McLoon, Verrill Dana LLP, Portland, ME; Glenn E. Mincey, Deloitte Tax LLP, New York, NY.
- 4:00pm** **Partnership Deal Structuring Mini-Panels.** Various mini-panels will discuss a number of significant opportunities and traps encountered in structuring joint ventures. The panels will cover layer cake vs. targeted allocations, negotiating section 704(c) allocations and tax liability distributions.
MODERATOR: William P. Bowers, Senior Counsel, Office of Assistant Secretary for Tax Policy, Department of Treasury, Washington, DC.
PANELISTS: (Panel 1) Jennifer Alexander, Deloitte Tax LLP, Washington, DC; Steven Schneider, Miller & Chevalier Chartered, Washington, DC; (Panel 2) Jeanne Sullivan, KPMG LLP, Washington, DC; Neil Barr, Davis Polk & Wardwell, New York, NY; (Panel 3) Martin D. Pollack, Weil Gotshal & Manges LLP, New York, NY; Ossie Borosh, Goulston & Storrs, Washington, DC.
- 5:00pm** **Hot Topics.** This panel will discuss recent developments affecting partnerships, including legislation, legislative proposals, regulations, administrative guidance and noteworthy cases.
MODERATOR: Craig A. Gerson, PricewaterhouseCoopers LLP, Washington, DC.
PANELIST: William P. O’Shea, Associate Chief Counsel of Passthroughs and Special Industries, IRS, Washington, DC.



2:30PM – 6:00PM

Casablanca H, Loews

State and Local Taxes 

CHAIR: Philip M. Tatarowicz, Ernst & Young LLP, Washington, DC

- 2:30pm State Taxation of Services, Mixed Transactions Involving Services.** Although the Florida and Massachusetts attempts at adding services to the sales tax base failed thirty years ago, a number of states have taxed various services for many years with varying degrees of success. This panel will discuss the evolution of sales taxation of services and the unique issues it presents in today's high-tech environment and will also address Michigan's passage of a tax on all gross receipts from services, its recent efforts to add a number of services to its sales tax base and the resulting political firestorm.
MODERATOR: John R. Shaughnessy Jr., Robinson & Cole LLP, Hartford, CT.
PANELISTS: Edward J. Bernert, Baker & Hostetler LLP, Columbus, OH;Carolynn S. Iafrate, Industry Sales Tax Solutions LLC, Exton, PA; Lynn A. Gandhi, Miller Canfield Paddock & Stone PLC, Detroit, MI.
- 3:20pm Federal Consolidated Return Issues for State Corporate Income Tax Filers.** A panel discussion of the issues encountered when affiliated corporations elect to file on a consolidated basis for federal purposes, but must file under a different method for state purposes. Issues discussed will include deferred intercorporate transactions; and, basis rules and use of NOLs. Discussion will also include drafting tax sharing agreements to address these issues internally.
MODERATOR: Diann Smith, Sutherland Asbill & Brennan LLP, New York, NY.
- 4:10pm VAT and State Retail Sales Taxes: A Comparative Perspective** *(Co-Sponsored with VAT and Other Consumption Taxes Committee).* This panel will discuss practical issues in coordinating a potential federal VAT with the existing state & local retail sales taxes, drawing on experience in coordinating federal and state consumption taxes from Canada and the European Union.
MODERATORS: Professor Reuven Avi-Yonah, University of Michigan Law School, Ann Arbor, MI; Stephanie Lipinski Galland, Thompson & Coburn LLP, Washington, DC.
PANELISTS: Professor Jack Mintz, University of Calgary, Calgary, AB; Luca Dell'Anese, Ropes & Gray LLP, Boston, MA; Itai Grinberg, Attorney-Advisor, Office of Tax Policy, Department of Treasury, Washington, DC.
- 5:10pm Protecting SALT Workpapers: *Textron* Through SALT Colored Glasses.** When and if states start demanding tax accrual/FIN 48 workpapers, what defenses will be available to taxpayers? How can privilege be established and protected? This panel of SALT attorneys will explore the current state of affairs critical to advising on this important matter.



PROGRAM SCHEDULE

FRIDAY, JANUARY 18 · PM

MODERATOR: Kimberley Reeder, Baker & McKenzie LLP, Palo Alto, CA.

PANELISTS: John Barrie, Bryan Cave LLP, Washington, DC; William Hilson, California Franchise Tax Board, Sacramento, CA; Margaret Wilson, Verizon Communications, Basking Ridge, NJ.

2:30PM – 5:30PM

Casablanca F, Loews

Tax Accounting

CHAIR: Jody Brewster, Skadden Arps Slate Meagher & Flom LLP, Washington, DC

2:30pm **Recent Developments in the Area of Tax Accounting.** This panel will cover important recent developments in the tax accounting area since the 2007 Joint Fall CLE Meeting in Vancouver, BC, with commentary and input from our guests from the Department of Treasury Office of Tax Policy and the IRS.

MODERATOR: Colleen O'Connor, Ernst & Young LLP, Washington, DC.

PANELISTS: Alison Jones, Ernst & Young LLP, Washington, DC; Sharon Kay, Taxation Specialist, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC; Brandon Carlton, Attorney-Advisor, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC; George Blaine, Associate Chief Counsel (Income Tax & Accounting), IRS, Washington, DC; Kimberly Koch, Special Counsel (Income Tax & Accounting), IRS, Washington, DC.

3:30pm **Proposal for Changes to Procedures for Requesting Accounting Method Changes.** This program will discuss the IRS recent proposal described in Notice 2007-88 to change the process for requesting accounting method changes. The panel will also discuss comments submitted by the public addressing issues raised in the Notice. We anticipate commentary and input from our guests from the Department of Treasury and the IRS.

MODERATOR: Helen Hubbard, Baker & McKenzie LLP, Washington, DC.

PANELISTS: Carol Conjura, KPMG LLP, Washington, DC; George Blaine, Associate Chief Counsel (Income Tax & Accounting), IRS, Washington, DC; Sharon Kay, Taxation Specialist, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC; Andrew Keyso, Special Counsel (Income Tax & Accounting), IRS, Washington, DC; Leslie J. Schneider, Ivins Phillips & Barker Chartered, Washington, DC.



- 4:20pm** **Are Sales-Based Royalties Required to be Capitalized under Section 263A?** This panel will discuss the recent controversy surrounding the extent to which royalties paid in connection with the manufacture of inventory and contingent on sales are required to be capitalized in ending inventory. The panel will critique the Tax Court decision in *Plastics Engineering v. Commissioner*. The panel will also compare and contrast the potential treatment of royalties with the treatment of other post-production costs, and the potential impact on pending guidance addressing royalties. We anticipate commentary and input from our guests from the Department of Treasury and the IRS.

MODERATOR: Heather Maloy, Skadden Arps Slate Meagher & Flom LLP, Washington, DC.

PANELISTS: Jan Skelton, Deloitte Tax LLP, Washington, DC; Sharon Kay, Taxation Specialist, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC; Brandon Carlton, Attorney-Advisor, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC; Kimberly Koch, Special Counsel (Income Tax & Accounting), IRS, Washington, DC.

- 4:50pm** **Carryover of Tax Accounting Methods Required in Section 381 Transactions.** This panel will discuss the recently issued proposed regulations under section 381 addressing the carryover of certain tax attributes, including accounting methods. This panel will consider the accounting method considerations that arise under sections 381(c)(4) and (c)(5) and it will address opportunities that may be available (and pitfalls to avoid) when undergoing a transaction subject to section 381.

MODERATOR: Jack Donovan, Ernst & Young LLP, Washington, DC.


PANELISTS: Kevin Anderson, BDO Seidman LLP, Bethesda, MD; Alison Jones, Ernst & Young LLP, Washington, DC; Sharon Kay, Taxation Specialist, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC; Brandon Carlton, Attorney-Advisor, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC.

2:30PM – 5:30PM

Casablanca A, Loews

Tax Exempt Financing

CHAIR: Michael G. Bailey, Foley & Lardner LLP, Chicago, IL

- 2:30pm** **Opening Remarks by the Chair.** 
- 2:35pm** **IRS and Department of Treasury Update.** This panel will discuss current developments in tax-exempt bonds, including the progress of items in the Priority Guidance Plan.
- PANELISTS:** Michael G. Bailey, Foley & Lardner LLP, Chicago, IL; John J. Cross III, Associate Tax Legislative Counsel, Office of Tax Policy, Department of Treasury, Washington, DC.



PROGRAM SCHEDULE

FRIDAY, JANUARY 18 · PM

- 3:15pm Tax Issues Arising from Sub-prime Mortgage Defaults Fallout.** This panel will discuss tax issues resulting from recent distress in the financial markets, including tax issues relating to conversion of auction rate securities to other modes and the treatment of bond insurance that does not result in cost savings.
PANELISTS: Clifford M. Gerber, Sidley & Austin LLP, San Francisco, CA; John J. Cross III, Associate Tax Legislative Counsel, Office of Tax Policy, Department of Treasury, Washington, DC.
- 3:40pm IRS Compliance Update.** This panel will update the committee on current IRS compliance and enforcement initiatives.
PANELISTS: Jeremy A. Spector, Mintz Levin Cohn Ferris Glovsky and Popeo PC, New York, NY; Clifford J. Gannett, Director, Tax-Exempt Bonds, IRS, Washington, DC.
- 4:30pm Standards of Practice Update.** This panel will discuss recent developments related to standards of practice for tax-exempt bond opinions and advice, including section 6694 of the code and amendments to Circular 230.
PANELISTS: Frederic L. Ballard Jr., Ballard Spahr Andrews & Ingersoll LLP, Washington, DC; John J. Cross III, Associate Tax Legislative Counsel, Office of Tax Policy, Department of Treasury, Washington, DC.
- 4:45pm New Reporting Requirements for 501(c)(3) Bonds.** This panel will discuss new Form 990 reporting requirements for tax-exempt bonds.
PANELISTS: Lauren K. Mack, Sonnenschein Nath & Rosenthal LLP, San Francisco, CA; Clifford J. Gannett, Director, Tax-Exempt Bonds, IRS, Washington, DC.
- 5:20pm Discussion of Public Comment Projects of the Committee.**
PANELISTS: Michael G. Bailey, Foley & Lardner LLP, Chicago, IL; Jeremy A. Spector, Mintz Levin Cohn Ferris Glovsky and Popeo PC, New York, NY.

3:00PM – 4:00PM

Fez A, Loews

Sponsorships

CHAIR: Rudolph R. Ramelli, Jones Walker LLP, New Orleans, LA

3:00PM – 5:00PM

Deserto & Lago, Garden Level, Ritz

Young Lawyers Forum – 2007 Law Student Tax Challenge ★

Final Rounds *(Open to the Public)*


Two separate competitions – one for JD finalists and one for LLM teams – will be held before separate panels of judges. Based on their oral presentations of solutions to the tax planning and client-counseling problem, winners from each division will be chosen and announced at the Diversity/Young Lawyers Reception.

**3:30PM – 5:30PM**

Salon I, Lobby Level, Ritz

Foreign Activities of US Taxpayers 

CHAIR: Andrew Breslow, Exxon Mobil Corporation, Irving, TX

- 3:30pm** **Opening Remarks by the Chair.** 
- 3:35pm** **Current Developments under Subpart F.** This panel will cover various recent developments under Subpart F, with an emphasis on Contract Manufacturing.
- MODERATOR:** Marc Gerson, Miller & Chevalier Chartered, Washington, DC.
- PANELISTS:** Michael DiFronzo, Deputy Associate Chief Counsel (International), IRS, Washington, DC; Michael Mundaca, Deputy Assistant Secretary for Tax Policy, Department of Treasury, Washington, DC; Jeremy Cox, Electronic Data Systems, Plano, TX; Rocco Femia, Miller & Chevalier Chartered, Washington, DC; Professor Robert Peroni, University of Texas Law School, Austin, TX; Lowell Yoder, McDermott Will & Emery LLP, Chicago, IL.
- 4:35pm** **General Update on FTC Guidance.** This panel will explore various recent developments in the foreign tax credit area, including the so-called “arbitrage” and “splitter” regulations under section 901, as well as new regulations dealing with two FTC baskets and the issue of “overall domestic losses.”
- MODERATOR:** Harry J. Hicks, Skadden Arps Slate Meagher & Flom LLP, Washington, DC.
- PANELISTS:** John Harrington, International Tax Counsel, Department of Treasury, Washington, DC; Steven Musher, Associate Chief Counsel (International), IRS, Washington, DC; Jeff Maydew, Baker & McKenzie LLP, Washington, DC; David Sotos, Skadden Arps Slate Meagher & Flom LLP, Washington, DC.

4:00PM – 6:30PM

Vineyard, Garden Level, Ritz

Diversity and Young Lawyers Forum  ★

DIVERSITY CHAIR: Alex Perez, Cox Smith Matthews Inc, San Antonio, TX

YOUNG LAWYERS FORUM CHAIR: Adam M. Cohen, Holland & Hart LLP, Denver, CO

- 4:00pm** **Making the Tax Section Work for You.** ★ This interactive panel presentation will explain the many benefits and opportunities available to Tax Section members as well as practical advice on how to publish, how to become involved in section leadership, the benefits of committee membership and other opportunities for professional advancement through involvement in the Tax Section.
- PANELISTS:** Stanley L. Blend, Oppenheimer Blend Harrison & Tate Inc, San Antonio, TX (Chair, Section of Taxation); Adam Cohen, Holland & Hart LLP, Denver, CO (Chair, Young Lawyers Forum); Armando Gomez, Skadden Arps Slate Meagher & Flom LLP, Washington, DC (Vice Chair, Government Relations); Louis A. Mezzullo, Luce Forward Hamilton



PROGRAM SCHEDULE FRIDAY, JANUARY 18 · PM

& Scripps LLP, Rancho Santa Fe, CA (Vice Chair, Publications); Professor Alice G. Abreu, Temple University, Beasley School of Law, Philadelphia, PA (Secretary, Section of Taxation); Alex Perez, Cox Smith Matthews Inc, San Antonio, TX (Chair, Diversity Committee).

5:30pm Networking Reception. ★ Tuscany, Garden Level, Ritz

5:00PM – 6:00PM Tangier, Loews

Professional Services

CHAIR: Charles J. Lavelle, Greenebaum Doll & McDonald PLLC, Louisville, KY

The Professional Services Committee will discuss opportunities for substantive committees and other Section members to participate in the CLE programs of the Section that take place outside the Committee meetings. The time and substantive input of members is vital to the success of these programs. Each substantive Committee has a member on the Professional Services Committee, but all are welcome.

5:00PM – 6:00PM Fez A, Loews

Programs and Meetings

CHAIR: Rudolph R. Ramelli, Jones Walker LLP, New Orleans, LA

5:30PM – 6:30PM Olive Grove, Garden Level, Ritz

Foreign Activities of US Taxpayers and Young Lawyers of FAUST Business Meeting ★

5:45PM – 6:30PM Village Boardroom, Garden Level, Ritz

Foreign Lawyers Forum Business Meeting

5:45PM – 6:30PM Orchard, Garden Level, Ritz

US Activities of Foreigners and Tax Treaties Business Meeting ★

The US Activities of Foreigners and Tax Treaties will have an open business meeting to discuss upcoming panels, projects and other committee matters.

6:30PM – 8:00PM Salon II, III&IV, Lobby Level, Ritz


Section Reception (Ticketed Event)

7:45PM – 10:00PM Rotunda Room, Reflection Bay

Joint International Committees Dinner ★ (Reservations Required)

The International Committees will be having a joint dinner in the Rotunda Room of the Reflection Bay Golf Course, located within the Lake Las Vegas Resort Complex. First-time attendees are welcome and encouraged to attend. The all-in total cost is \$135 per person, which includes a buffet-style dinner and unlimited beer, wine and mixed drinks. *Reservations Required.*



 = Taped

★ = Young Lawyers Program

 = Ethics Credit Requested

 = No CLE Credit

NOTE: Programs are listed chronologically by day and starting time. Refer to p. 60 for the Alpha Schedule.

7:00AM – 8:00AM

Monte Vista, Garden Level, Ritz

Employee Benefits Defined Benefit Plans Update

Presented by the Subcommittee on Defined Benefit Plans

CHAIRS: Elizabeth E. Drigotas, Deloitte & Touche LLP, Washington, DC; W. Scott Magargee III, Dechert LLP, Philadelphia, PA; Seth H. Tievsky, Ernst & Young LLP, Washington, DC (*Chair Emeritus*); Anne M. Meyer, Snell & Wilmer LLP, Phoenix, AZ (*Young Lawyer Liaison*)

The Subcommittee intends to discuss the following topics: (i) Acquiring and aggregating frozen, underfunded DB plans by an unrelated corporation created and in business to administer frozen DB plans on an ongoing basis; (ii) continued discussion of impact and compliance issues relating to recent proposed regulations on “Benefit Restrictions for Underfunded Pension Plans” and (iii) update on IRS, Department of Treasury and PBGC activities. Government representatives from Department of Treasury, IRS Chief Counsel and Employee Plans have been invited to attend.

7:00AM – 4:00PM

Medinas Foyer, Loews

Hospitality Center (*Complimentary*)

Ballroom Foyer, Lobby Level, Ritz

Continental breakfast will be served in the morning and snacks, coffee, sodas and water will be available in the afternoon.

7:00AM – 9:00AM

Casablanca B, Loews

Low Income Taxpayers

CHAIR: Joseph Barry Schimmel, Cohen Chase Hoffman & Schimmel PA, Miami, FL

7:00am Opening Remarks by the Chair. 

7:05am **Report of the National Taxpayer Advocate.** The speaker will discuss the major findings and recommendations from the National Taxpayer Advocate’s 2007 Annual Report to Congress.

SPEAKER: Nina E. Olson, National Taxpayer Advocate, IRS, Washington, DC.

8:00am **Tax Issues of Native Americans.** This panel will discuss tax issues of Native Americans, including identifying taxable versus nontaxable payments to tribal members and the special problems involving family tax benefits such as the earned income credit.

MODERATOR: Professor Dale Kensinger, University of Missouri–Kansas City Law School, Kansas City, MO.

PANELISTS: Christie Jacobs, Director, Indian Tribal Governments Office, IRS, Denver, CO; Professor Cheyanna Jaffke, Western State University College of Law, Fullerton, CA.



PROGRAM SCHEDULE SATURDAY, JANUARY 19 · AM

7:00AM – 8:30AM

Casablanca C, Loews

Tax Practice Management

CHAIR: David A. Berek, Credit Suisse, Chicago, IL

- 7:00am** Informal Discussion and Complimentary Breakfast. 
- 7:25am** Opening Remarks by the Chair, Report of Committee Chairs and Vice Chairs. 
- 7:30am** Update on Return Preparer Standards, Section 6694 and Circular 230 (Co-Sponsored with Standards of Tax Practice).  This panel will discuss the application of return preparer standards for income and estate and gift tax practitioners through hypothetical and participant questions.
- MODERATOR:** Professor Michael B. Lang, Chapman University School of Law, Orange, CA.
- PANELISTS:** Anita Soucy, Attorney-Advisor, Tax Legislative Counsel, Department of Treasury, Washington, DC; Rochelle Hodes, PricewaterhouseCoopers LLP, Washington, DC; Louis A. Mezzullo, Luce Forward Hamilton & Scripps LLP, Rancho Santa Fe, CA.

7:15AM – 8:30AM

Casablanca G&H, Loews

Real Estate, Partnerships & LLCs and S Corporations “Shop Talking” Breakfast ★ (Ticketed Event)

Members of the Real Estate, Partnerships & LLCs and S Corporations Committees will gather for the traditional “open mic” breakfast to share ideas and war stories and to seek input on technical issues.

7:30AM – 9:30AM

Tuscany, Garden Level, Ritz

ACTC Board of Regents Meeting (Executive Session)

7:30AM – 8:15AM

Casablanca F, Loews

Committee Chairs, Vice Chairs, Officers and Council Breakfast

SPONSORED BY: Borden Ladner Gervais LLP

7:45AM – 9:00AM

Casablanca A, Loews

Court Procedure and Practice Officers and Subcommittee Chairs Breakfast (Ticketed Event)

8:00AM – 9:00AM

Village Boardroom, Garden Level, Ritz

Employee Benefits Corporate Counsel Forum Update

Presented by the Employee Benefits Corporate Counsel Forum

CHAIR/VICE-CHAIR: Cheryl L. Harwick, Marathon Oil Company, Findlay, OH; Vicki Dawn Blanton, JC Penney Company Inc, Plano, TX

This session will discuss items of interest to those in attendance.



8:30AM – 11:30AM

Casablanca D, Loews

Civil and Criminal Tax Penalties 🗣️

CHAIR: Bryan C. Skarlatos, Kostelanetz & Fink, New York, NY

- 8:30am** Opening Remarks by the Chair. 🗣️
- 8:35am** **Reports of Subcommittees.** Important Developments – Civil: Thomas A. Cullinan, Sutherland Asbill & Brennan LLP, Atlanta, GA. Important Developments – Criminal: Caroline D. Ciruolo, Rosenberg Martin Greenberg LLP, Baltimore, MD; Diana Erbsen, DLA Piper US LLP, New York, NY. Monetary Violations and Forfeitures: James N. Mastracchio, Caplin & Drysdale Chartered, Washington, DC. Legislative and Administrative Developments: John Colvin, Chicoine & Hallett PS, Seattle, WA. International Tax Enforcement: Bruce Zagaris, Berliner Corcoran & Rowe LLP, Washington, DC. IRS Investigations and Practices: Josh Ungerman, Meadows Collier Reed Cousins & Blau LLP, Dallas, TX.
- 9:15am** **Tax Shelter Prosecution Update.** The Department of Justice has indicted principals from two of the big four accounting firms for their involvement in certain listed transactions. This update will provide information on the current status of the prosecutions in *US v. Stein* and *US v. Coplan*.
PANELIST: Kathryn Keneally, Fulbright & Jaworski LLP, New York, NY.
- 9:30am** **Codification of the Economic Substance Doctrine.** Codification of the economic substance doctrine appears to be inevitable. This program will review the structure of the proposed penalty and provide some insight into how it may be applied by the IRS and the courts.
MODERATOR: Kathleen Pakenham, White & Case LLP, New York, NY.
PANELISTS: Michael Desmond, Tax Legislative Counsel, Department of Treasury, Washington, DC; Joshua Odintz, Tax Counsel, Senate Finance Committee, US Congress, Washington, DC; M. Todd Welty, Meadows Collier Reed Cousins & Blau LLP, Dallas, TX.
- 10:35am** **Sentencing in Tax Cases: Applying the Guidelines in Light of Recent Supreme Court Decisions.** The law governing application of the sentencing guidelines to tax crimes is still in flux. This program will review and discuss the US Supreme Court's recent decisions in *Rita v. US* and *Gall v. US*, focusing on whether this decision and other pending cases will substantially change the manner in which district courts go about sentencing in tax cases and how the courts of appeal will conduct their review of appealed sentences.
MODERATOR: Niles Elber, Caplin & Drysdale Chartered, Washington, DC.
PANELISTS: Ian Comisky, Blank Rome LLP, Philadelphia, PA; Kevin Downing, Senior Trial Attorney, Criminal Enforcement Section, Tax Division, Department of Justice, Washington, DC; Harry Sandick, Schulte Roth & Zabel LLP, New York, NY; The Honorable William W. Wilkins Jr., US Court Appeals for the Fourth Circuit, Greenville, SC.



PROGRAM SCHEDULE

SATURDAY, JANUARY 19 · AM

8:30AM – 11:30AM

Casablanca E, Loews

Corporate Tax

CHAIR: Julie Divola, Pillsbury Winthrop Shaw Pittman LLP, San Francisco, CA


- 8:30am Recent Developments.** This panel will discuss recent developments in corporate taxation.
MODERATOR: Robert G. Woodward, King & Spalding LLP, Atlanta, GA.
PANELISTS: Marc Countryman, Attorney-Advisor, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC; Audrey Nacamuli, General Electric Company, Stamford, CT; David B. Strong, Holme Roberts & Owen LLP, Denver, CO.
- 9:45am Pre and Post-Transaction Restructurings.** This panel will explore restructuring transactions undertaken to accommodate an acquisition or a spin-off, as well as post-acquisition integration transactions. Restructuring transactions to be discussed will include qualified stock purchases, LLC conversions, D reorganizations, F reorganizations and upstream mergers.
MODERATOR: Philip B. Wright, Bryan Cave LLP, St. Louis, MO.
PANELISTS: Eric Solomon, Assistant Secretary (Tax Policy), Department of Treasury, Washington, DC; William D. Alexander, Associate Chief Counsel (Corporate), IRS, Washington, DC; R. David Wheat, Thompson & Knight LLP, Dallas, TX; Gary Wilcox, Morgan Lewis & Bockius LLP, Philadelphia, PA.

8:30AM – 11:30AM

Kenitra B, Loews

Fiduciary Income Tax

CHAIR: A. Christopher Sega, Venable LLP, Washington, DC

- 8:30am Opening Remarks.**  Report on committee chairs and vice-chairs breakfast topics and other committee business.
SPEAKER: Jeanne L. Newlon, Venable LLP, Washington, DC.
- 8:35am Recent Developments.** Report on recent developments affecting the income taxation of trusts and estates.
SPEAKER: Lisa M. Stern, Proskauer Rose LLP, New York, NY.
- 8:50am Presentation of Checklist of Income Tax Issues with Implementation of Lifetime Estate Tax Planning Techniques.** The speaker will discuss the income tax issues that arise with respect to planning with gifts, installment notes and SCINs in grantor and nongrantor trusts.
SPEAKER: John I. Fishburne III, Purcell Flanagan & Hay PA, Jacksonville, FL.



- 9:20am Potential Liability Traps and Creative Planning Techniques in Trust Administration.** The presentation will focus on potential liability traps for trustees stemming from the conflicts that can arise between income beneficiaries and remainder persons. The panel will look at minimizing fiduciary risk in three areas—the investment of the trust portfolio, the distribution of trust funds and the allocation of the tax burden. The panel will also examine the benefits of making in-kind distributions of appreciated property to philanthropically minded trust beneficiaries.
SPEAKERS: Sharon L. Klein, Fiduciary Trust Company International, New York, NY; Craig Richards, Fiduciary Trust Company International, New York, NY.
- 10:10am The New Charitable Lead Trust Forms.** The IRS issued Rev. Proc. 2007-46 and Rev. Proc. 2007-47. In these Revenue Procedures, the IRS provided sample testamentary charitable lead annuity trust and inter vivos charitable lead annuity trust forms. This panel will review the forms and discuss issues arising from Revenue Procedures.
SPEAKERS: Martin Hall, Ropes & Gray LLP, Boston, MA; Catherine V. Hughes, Attorney-Advisor, Office of Tax Policy, Department of Treasury, Washington, DC.
- 10:45am Update on Section 67(e).** Section 67(e) gives trusts and creates the ability to deduct certain expenses without being subject to the 2 percent floor. This panel will review the recent developments in this area, including the proposed regulations under section 67(e), the status of the Supreme Court's review of the *Rudkin* case and related issues.
SPEAKERS: David A. Berek, Credit Suisse Securities LLC, Chicago, IL; Catherine V. Hughes, Attorney-Advisor, Office of Tax Policy, Department of Treasury, Washington, DC; Grace Allison, Northern Trust Company, Chicago, IL.

8:30AM – 10:30AM

Tangier, Loews

LLC Subcommittee of Partnerships & LLCs

CHAIR: Thomas Yearout, Holme Roberts & Owen LLP, Denver, CO

8:30AM – 11:45AM

Rabat, Loews

Sales, Exchanges and Basis 

CHAIR: David Shechtman, Drinker Biddle & Reath LLP, Philadelphia, PA

- 8:30am Opening Remarks by the Chair.** 
- 8:35am Sales and Exchanges: Current Developments.** Presentation of new cases, rulings and pending legislation affecting sales, exchanges and basis (other than section 1031).
MODERATOR: Professor Erik Jensen, Case Western Reserve University School of Law, Cleveland, OH.
PANELIST: Professor Bradley T. Borden, Washburn University School of Law, Topeka, KS.



PROGRAM SCHEDULE

SATURDAY, JANUARY 19 · AM

9:05am **1031 Current Developments.** The panel will discuss recent rulings, cases and other section 1031 developments, including the Final Regulations under section 468B which are anticipated to be released prior to the meeting date.

MODERATOR: David Shechtman, Drinker Biddle & Reath LLP, Philadelphia, PA.

PANELISTS: Kelly E. Alton, Nationwide Exchange Services, Washington, DC; Mary B. Foster, 1031 Services, Inc., Bellevue, WA.

9:50am **Tax Consequences of Carbon Emissions Allowances: Much Ado About CO₂.** As numerous jurisdictions consider air emission allowance programs, this panel will consider tax issues arising from the allocation, transfer, sale or exchange of such allowances in light of Rev. Proc. 92-91 and a recent private letter ruling.

MODERATOR: Professor Annette Nellen, San Jose State University, College of Business, San Jose, CA.

PANELIST: Kelly E. Alton, Nationwide Exchange Services, Washington, DC.

10:45am **The Other Starker Exchange Issue: Analyzing Exchanges Involving Contract Rights or Options.** This panel will analyze whether certain exchanges in which the relinquished property and/or the replacement property is a contract right or an option (as opposed to a direct interest in the underlying property) can qualify for non-recognition under section 1031.

MODERATOR: Professor Bradley T. Borden, Washburn University School of Law, Topeka, KS.

PANELIST: Max Hansen, American Equity Exchange, Dillon, MT; Professor Brant Hellwig, University of South Carolina School of Law, Columbia SC.

8:30AM – 10:30AM

Salon III, Lobby Level, Ritz

Transfer Pricing

CHAIR: David J. Canale, Ernst & Young LLP, Washington, DC

8:30am **Transfer Pricing Audits: The Current Landscape.** This panel will focus on the range of initiatives and issues currently affecting IRS transfer pricing audits, including Tier 1 coordination and its downstream impact on audit teams and the Penalty Oversight Committee, the impact of the recently issued cost-sharing Coordinated Issue Paper, the impact of FIN 48 disclosures and the potential role of the CAP program in the realm of transfer pricing.

MODERATOR: Sanford W. Stark, McKee Nelson LLP, Washington, DC.

PANELISTS: Steven Musher, Associate Chief Counsel (International), IRS, Washington, DC; Brian P. Trauman, Mayer Brown LLP, New York, NY.



- 9:30am** **Privilege and Accounting, Penalty and Ethical Standards for Transfer Pricing Practitioners.** 🗣️ This panel will address attorney-client privilege, accountant-client privilege under section 7525 and work product privilege and the maze of standards established under sections 6662, 6694, FIN 48 and Circular 230.
MODERATOR: Alan Shapiro, Deloitte Tax LLP, Chicago, IL.
PANELISTS: Steven Musher, Associate Chief Counsel (International), IRS, Washington, DC; Brian Trauman, Mayer Brown LLP, New York, NY; Joseph Andrus, PricewaterhouseCoopers LLP, Boston, MA.

9:00AM – 12:00PM **Salon I, Lobby Level, Ritz**
Employee Benefits 🗣️

CHAIR: David Mustone, Hunton & Williams LLP, McLean, VA

- 9:00am** **Opening Remarks by the Chair.** 🗣️
- 9:05am** **Changes on the Horizon for Cafeteria Plans.** This session will examine the key features of the comprehensive proposed section 125 regulations (including the expanded plan documentation and substantiation requirements, the non-discrimination testing rules and use of debit cards) and their potential impact on cafeteria plan operation and maintenance.
MODERATOR: Alden J. Bianchi, Mintz Levin Cohn Ferris Glovsky & Popeo PC, Boston, MA.
PANELISTS: Kevin Knopf, Attorney-Advisor, Office of Benefits Tax Counsel, Department of Treasury, Washington, DC; Mark L. Stember, Kilpatrick Stockton LLP, Washington, DC; Roberta Casper Watson, Trenam Kemker Scharf Barkin Frye O'Neill & Mullis PA, Tampa, FL.
- 10:00am** **Blurring The Lines—Phasing In and Out of Employment.** This session will focus on the challenges for employee benefit plan design and administration posed by phased retirement, work/life balance, outsourcing and related events.
MODERATOR: Eleanor Banister, King & Spalding LLP, Atlanta, GA.
PANELISTS: William Bortz, Associate Benefits Tax Counsel, Office of Tax Policy, Department of Treasury, Washington, DC; Peter J. Hunt, Pillsbury Winthrop Shaw Pittman LLP, New York, NY; Danny A. Martin Jr., Shell Oil Company, Houston, TX.
- 11:00am** **Avoiding and Recovering 409A Fumbles.** The panel will review the latest 409A guidance, including any correction program (if issued), reporting and withholding rules and procedures and other developments. The panel will also discuss preparing and reviewing documentary and operational compliance to avoid fumbles as the probable final deadline for documentary and full operational compliance looms.
MODERATOR: Greta E. Cowart, Haynes and Boone LLP, Dallas, TX.



PROGRAM SCHEDULE

SATURDAY, JANUARY 19 · AM


PANELISTS: William C. Schmidt, Senior Counsel, Executive Compensation Branch, Office of Division Counsel/Associate Chief Counsel (TE/GE), IRS, Washington, DC; Stephen B. Tackney, Senior Counsel, Executive Compensation Branch, Office of Division Counsel/Associate Chief Counsel (TE/GE), IRS, Washington, DC; Helen H. Morrison, Attorney Advisor, Office of Benefits Tax Counsel, Department of Treasury, Washington, DC; Susan P. Serota, Pillsbury Winthrop Shaw Pittman LLP, New York, NY; T. David Cowart, Sonnenschein Nath & Rosenthal LLP, Dallas, TX; Wayne R. Luepker, Mayer Brown LLP, Chicago, IL.

9:00AM – 10:30AM

Casablanca B, Loews


Pro Bono  ★

CHAIR: Robert McKenzie, Arnstein & Lehr LLP, Chicago, IL

- 9:00am Military VITA Program.** ★ This program will discuss the Section of Taxation's participation in the military VITA program which provides free tax preparation services to low income military personnel.
MODERATOR: Kevin Anderson, BDO Seidman LLP, Bethesda, MD.
- 9:30am Critical Deadline Cases in Tax Court.** ★ This program will discuss common mistakes and difficulties when commencing *pro bono* representation of taxpayers in tax court after taxpayers have commenced litigation *pro se*. It also will offer guidance for commencing representation of *pro se* taxpayers close to the expiration of the notice of deficiency.
MODERATOR: Professor Sara V. Spodick, Quinnipiac University School of Law, Hamden, CT.
- 10:15am Sub-Committee Reports.**  Committee business will be conducted with reports from sub-committee chairs and project chairs.
SPEAKERS: VITA: Kevin Anderson, BDO Seidman LLP, Bethesda, MD; Exempt Orgs: Eve Borenstein, Borenstein and McVeigh Law Office LLC, Minneapolis, MN; Pro Bono Award: Karen Hawkins, Taggart & Hawkins PC, Oakland, CA; Low Income Manual: Professor Sara V. Spodick, Quinnipiac University School of Law, Hamden, CT.

9:00AM – 10:30AM

Fez A&B, Loews

State and Local Taxes: Practitioners' Roundtable  (Executive Session)

An interactive discussion and roundtable that will cover current developments, recent cases, hot issues and burning questions posed by the attendees to their peers. The roundtable is not recorded so questions and answers can be discussed freely and impartially.

MODERATOR: Edward J. Bernert, Baker & Hostetler LLP, Columbus, OH.



9:30AM – 11:30AM

Kenitra A, Loews

Simplification 🗣️ (Executive Session)

CHAIR: Helen M. Hubbard, Baker & McKenzie LLP, Washington, DC

10:00AM – 12:00PM

Casino Montelago

Companions' Activity: Blackjack Lesson & Tournament 🗣️ (Ticketed Event)

See p. 59 for a full description.

10:30AM – 11:00AM

Fez A&B, Loews

State and Local Taxes Subcommittee: *The State and Local Tax Lawyer*

Meeting of interested parties to discuss current and future issues of the SALT Committee's publication, *The State and Local Tax Lawyer*.

11:30AM – 12:30PM

Tangier, Loews

Publications 🗣️

CHAIR: Louis A. Mezzullo, Luce Forward Hamilton & Scripps LLP, Rancho Santa Fe, CA
The Publications Committee will discuss issues related to its publications, including *The Tax Lawyer*, *The State and Local Tax Lawyer*, the *NewsQuarterly* and other single title publications. In addition, opportunities to develop new titles will be discussed. Those who serve as editors on any of the Tax Section's publication are particularly encouraged to attend, and others interested in becoming involved are welcome.

12:30PM – 2:00PM

Casablanca D, Loews

Section Luncheon/Plenary Session 🗣️ ★ 🗣️ (Ticketed Event)

Stanley L. Blend, Section Chair, Presiding

Chair's Report to the Section

Stanley L. Blend, Section Chair

Report of Nominating Committee

Dennis B. Drapkin, Chair, Nominating Committee

Certificate Presentation

2007 – 2008 John S. Nolan Tax Law Fellows

Announcement

2008 – 2009 John S. Nolan Tax Law Fellows

Award Presentation

2008 Janet Spragens Pro Bono Award



PROGRAM SCHEDULE

SATURDAY, JANUARY 19 · PM

Panel Discussion

New Standards and Higher Penalties for Practitioners Who Give Tax Advice ★ 🗣️

In May 2007, Congress amended IRC §6694 to change the standard for imposition of the return preparer penalty to “more likely than not” from “realistic possibility of success,” expanding the scope of preparers subject to the penalty and increasing the amount of the penalty. In September 2007, the Department of Treasury proposed similar changes to section 10.34 of Circular 230. This panel will address the legal and practical problems raised by the new standards as well as the degree of diligence that will be required from return preparers and tax practitioners.

MODERATOR: Caroline D. Ciralo, Rosenberg Martin Greenberg LLP, Baltimore, MD

PANELISTS: Megan L. Brackney, Kostelanetz & Fink LLP, New York, NY

Deborah A. Butler, Associate Chief Counsel (Procedure and Administration), IRS, Washington, DC

Michael Desmond, Tax Legislative Counsel, Department of Treasury, Washington, DC

Ellis L. Reemer, DLA Piper US LLP, New York, NY

Diana Wollman, Sullivan & Cromwell LLP, New York, NY

SPONSORED BY: Standards of Tax Practice and Civil & Criminal Tax Penalties

2:00PM – 4:30PM

Casablanca F, Loews

Standards of Tax Practice 🗣️ 🗣️

CHAIR: Professor Mona L. Hymel, University of Arizona, James E. Rogers College of Law, Tucson, AZ

2:00pm Opening Remarks from the Chair. 🗣️

2:05pm **Report from the IRS on Ethics.** 🗣️ Standards of practice are a continuing area of attention by the IRS. This program will provide a report on the current activities including the status of Circular 230 amendments.

PANELISTS: Deborah A. Butler, Associate Chief Counsel, Office of Chief Counsel, IRS, Washington, DC; Richard Goldstein, Associate Chief Counsel, Office of Chief Counsel, IRS, Washington, DC; Michael Chesman, Director, Office of Professional Responsibility, IRS, Washington, DC.

2:40pm **Circular 230 Update.** 🗣️ This panel will discuss recent trends in changes to Circular 230. The Department of Treasury has issued a number of final and proposed regulations under Circular 230 over recent years and many commentators have noted that Circular 230's standards based approach, similar to the Model Rules on Ethics, has been replaced by very specific rule-based regulations. The panel will discuss how this trend impacts practitioners, taxpayers and tax practice.



MODERATOR: Professor Roberta F. Mann, Widener University School of Law, Wilmington, DE.

PANELISTS: Michael Desmond, Tax Legislative Counsel, Department of Treasury, Washington, DC; Professor Mona L. Hymel, University of Arizona, James E. Rogers College of Law, Tucson, AZ; Steven C. Salch, Fulbright & Jaworski LLP, Houston, TX.

3:35pm

Litigation with the IRS's Office of Professional Responsibility. ☞

This panel will explore the issues involved in litigating a case with the IRS Office of Professional Responsibility. The panel will also discuss the recent amendments to Circular 230 and how they may affect the overall litigation.

MODERATOR: Cono R. Namorato, Caplin & Drysdale Chartered, Washington, DC.

PANELISTS: Bridgette M. Gibson, Area Counsel-Dallas, Office of Associate Chief Counsel (General Legal Services), IRS, Dallas, TX; Charlie Ruchelman, Caplin & Drysdale Chartered, Washington, DC; Bryan C. Skarlatos, Kostelanetz & Fink LLP, New York, NY.

SECTION PROGRAM

2:00PM – 5:00PM

Casablanca B, Loews

Current Developments in Individual, Corporate, Partnership and Estate & Gift Taxation ☞ ★

This program provides a review of the most significant judicial and administrative developments during the preceding year. The panel will discuss income taxation developments as well as estate and gift taxation developments.

PANELISTS: Professor Elaine Hightower Gagliardi, University of Montana School of Law, Missoula, MT
 Professor Martin J. McMahon Jr., University of Florida, Fredric G. Levin College of Law, Gainesville, FL
 Professor Ira B. Shepard, University of Houston Law Center, Houston, TX
 Professor Daniel L. Simmons, University of California-Davis School of Law, Davis, CA

SPONSORED BY: Teaching Taxation

SECTION PROGRAM

2:00PM – 4:00PM

Salon I, Lobby Level, Ritz

Everything You Need to Know about the New PPA'06 Funding Requirements, but Haven't Had Time to Learn ☞

The program will (i) review the far-reaching statutory changes made to the minimum funding requirements by the Pension Protection Act of 2006, including the related notice provisions changes to Title IV of ERISA, for both single-employer and multi-employer plans, (ii) discuss the guidance that has been issued so far by the



SECTION PROGRAMS

SATURDAY, JANUARY 19 · PM

responsible agencies and (iii) provide practical pointers on compliance, including handling funding issues in the M&A context under the new rules.

MODERATORS: Kurt L.P. Lawson, Pillsbury Winthrop Shaw Pittman LLP, Washington, DC
Stuart A. Sirkin, Ernst & Young LLP, Washington, DC

PANELISTS: Robert J. Doyle, Director of Regulations & Interpretations, Employee Benefits Security Administration, Department of Labor, Washington, DC
Douglas L. Greenfield, Bredhoff & Kaiser PLLC, Washington, DC
Ellen A. Hennessy, Fiduciary Counselors Inc, Washington, DC
Harlan Weller, Government Actuary, Office of Tax Policy, Department of the Treasury, Washington, DC

SPONSORED BY: Employee Benefits

SECTION PROGRAM

2:00PM – 4:00PM

Casablanca G, Loews

Proposed Regulations on Capitalizing Costs of Acquiring and Improving Tangible Assets

In 2006, proposed regulations under section 263(a) were issued relating to amounts paid to acquire, produce or improve tangible property and clarifying what amounts must be capitalized rather than deducted currently. The proposed regulations provide (i) tests for determining whether amounts paid are to be capitalized or deducted as repair and maintenance expenditures, (ii) operating rules for applying the tests and (iii) guidance for determining the unit of property with respect to which the tests apply. It is expected that these proposed regulations will be re-proposed before the 2008 Midyear Meeting. The program will review the new regulations, including consideration of how the regulatory tests and operating rules are different from the earlier proposed regulations. Government panelists involved with the regulations project, both from Department of Treasury Office of Legislative Counsel and IRS Office of Chief Counsel will offer insight regarding policy and administrative concerns shaping the regulations. Several practitioners will discuss issues raised by the new regulations.

MODERATOR: Ellen McElroy, Pepper Hamilton LLP, Washington DC

PANELISTS: Brandon Carlton, Attorney-Advisor, Office of Tax Legislative Counsel, Department of Treasury, Washington, DC

Susan Grais, Ernst & Young LLP, Washington, DC

Heather Johnson, Discovery Communications, Silver Spring, MD

Sharon Kay, Taxation Specialist, Office of Legislative Counsel, Department of Treasury, Washington, DC

Kimberly Koch, Special Counsel (Income Tax & Accounting), IRS, Washington, DC

Todd Reinstein, Pepper Hamilton LLP, Washington, DC

SPONSORED BY: Tax Accounting, Sales, Exchanges & Basis and Capital Recovery & Leasing

**SECTION PROGRAM****2:00PM – 4:00PM**

Casablanca C, Loews

Status of Streamlined Sales Tax Project 


This program will describe the effort to harmonize state sales and use taxes that has been pursued by over 40 states over the past five years. The panelists will present a brief history of the “SST,” explain the principal provisions of the Streamlined Sales Tax Agreement and discuss the issues yet to be resolved.

SPEAKERS: R. Bruce Johnson, Utah Tax Commissioner, Salt Lake City, UT
 Stephen P. Kranz, Sutherland Asbill & Brennan LLP, Washington, DC
 Arthur R. Rosen, McDermott Will & Emery LLP, New York, NY

SPONSORED BY: State and Local Taxes

SECTION PROGRAM**2:00PM – 4:00PM**

Salon III, Lobby Level, Ritz

Your Client's First Foreign Subsidiary: The Tax Basics That You Both Need To Know  ★

This program is meant for a tax advisor who practices primarily in the domestic arena, but whose client is expanding overseas through a new corporate subsidiary. The program will focus on the special, outbound “toll charge” tax regime applicable to otherwise tax-free reorganizations and tax-free contributions. Fact patterns addressed will include the incorporation of a profitable branch, the incorporation of a non-profitable branch and transfers of corporate shares and partnership interests. The program will also discuss the chief US Federal income tax rules applicable to a US person's ongoing ownership of a foreign corporation, as well as the recently enacted “anti-inversion” rules. Finally, attendees will be familiarized with the special information and tax return obligations associated with owning a foreign subsidiary.

SPEAKERS: Jeffrey S. Korenblatt, DLA Piper US LLP, Washington, DC
 Margie Rollinson, Ernst & Young LLP, Washington, DC
 Ansgar Simon, Shearman & Sterling LLP, New York, NY

SPONSORED BY: Foreign Activities of US Taxpayers



AFFILIATED ORGANIZATIONS

AMERICAN COLLEGE OF TAX COUNSEL

SATURDAY, JANUARY 19

7:30AM – 9:30AM Tuscany, Garden Level, Ritz
ACTC Board of Regents Meeting (*Executive Session*)

5:30PM – 6:00PM Salon III, Lobby Level, Ritz
ACTC Annual Business Meeting (*ACTC Members Only*)

6:00PM – 7:00PM Salon III, Lobby Level, Ritz
2007 Griswold Lecture (*Open Session*)
BY: Lawrence B. Gibbs, Former Commissioner of IRS

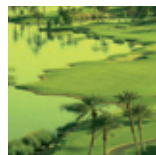
7:30PM – 9:30PM Salon II, Lobby Level, Ritz
Reception/Dinner (*ACTC Members and Guests*)

SUNDAY, JANUARY 20

7:30AM – 8:30AM Salon III, Lobby Level, Ritz
Continental Breakfast (*ACTC Members Only*)

8:30AM – 9:30AM Salon III, Lobby Level, Ritz
Panel Discussion (*ACTC Members Only*)

GENERAL INFORMATION



RITZ-CARLTON PROGRAMS

The following meetings and events will take place at the Ritz-Carlton. All other meetings and events will be held at the Loews.

ACTC	Foreign Lawyers Forum
Diversity	Law Student Tax Challenge
Employee Benefits (<i>Committee Meetings, Subcommittee Meetings & Mini-Program</i>)	Section Reception
Exempt Organizations (<i>Committee Meeting & Subcommittee Meetings</i>)	Transfer Pricing
Foreign Activities of US Taxpayers	US Activities of Foreigners and Tax Treaties
	Young Lawyers Forum



MEETING MATERIALS

Meeting materials for the **2008 Midyear Meeting** are available on CD-ROM in PDF format. Should you wish to print out any materials, convenient print stations provided by **Chicago Deferred Exchange Company** are located near the Meeting Registration Booth at both the Loews and the Ritz-Carlton.

Please note that materials not provided in advance to the Section are available in hard copy on-site and are not on the CD-ROM. These materials, to the extent they are provided to the Section, and those included on the *Meeting Material CD-ROM* will also be made available to Tax Section members following the meeting as an exclusive membership benefit at www.abanet.org/tax/commonline.

CLE AND ETHICS CREDIT

You *must be registered for the meeting* in order to attend and be eligible to receive CLE or ethics credit. Accreditation has been requested for this meeting from every state with Mandatory Continuing Legal Education (MCLE) requirements for lawyers. Each state has its own rules and regulations, including its definition of "CLE." The Section has requested CLE credit for subcommittee meetings that include a program description and names of panelists. Eligible subcommittees are listed on the Uniform Certificate of Attendance. The Uniform Certificate of Attendance is included on the *Meeting Material CD-ROM* and is available at the CLE Information Booth for both attendees and speakers.

Please note the  symbol indicates that Ethics credit has been requested for this program, and the  symbol indicates that CLE credit is not available for this program. Call the Section of Taxation at (202) 662-8670 with any questions pertaining to the number of credit hours granted by each state.



GENERAL INFORMATION

REQUIREMENTS FOR NEW YORK ATTORNEYS: You are responsible for signing in and out of each session you attend so a New York Uniform Certificate of Attendance can be customized for you. The New York sign-in/out sheets are available in each meeting room, and the Uniform Certificate of Attendance Form is available at the CLE Information Booth. **In order to receive full credit for all sessions attended, you MUST stop by the CLE Information Booth before you leave the Meeting and give your contact information so your New York certificate can be completed and mailed to you after the Meeting.**

CLE INFORMATION BOOTH

The CLE Information Booth, located near the Meeting Registration Booth at both the Loews and the Ritz-Carlton, will be open during the following hours:

Thursday	12:00pm – 7:30pm
Friday	8:00am – 6:30pm
Saturday	8:00am – 5:30pm

Please direct all questions regarding CLE credit to the CLE Information Booth, not the Registration Desk.

AUDIO CDs AND MP3 INSTANT DOWNLOADS

Audio CDs and MP3s of Committee Meetings and Section Programs are available for purchase on site. To place an order, visit the Digital Conference Providers (DCP) booth located near the Meeting Registration Booth at both the Loews and Ritz-Carlton. After the meeting visit: www.dcporder.com/abatx/ for mail order audio CDs or www.dcpvidersonline.com/abatx/ for instant downloads.

20% MEETING DISCOUNT ON SECTION PUBLICATIONS

Stop by the Publications Display, located in the Medinas Foyer at the Loews, to preview the most popular titles from the Section of Taxation and receive a 20% discount on all publication orders. Drop off your completed order form on-site at the Meeting Registration Desk, or fax it to the Section Office at 202-662-8682 to take advantage of this special discount. **Please note that the offer expires Friday, January 25, 2008.**

SECTION RECEPTION

The Section Reception is on Friday, from 6:30pm – 8:00pm, and will be held at the Ritz-Carlton.

REFUND POLICY

All cancellations and refund requests must have been received in writing and post-marked, faxed or emailed by January 10, 2008 to receive a refund. All refund requests incur a \$50 cancellation fee. **Refunds will not be granted at or after the meeting.**

ACTIVITIES



THURSDAY, JANUARY 17

7:00AM – 2:00PM

Golf Outing at Reflection Bay Golf Club

(Ticketed Event – \$230)

The 7,261-yard, par-72 award-winning Reflection Bay course, designed by Jack Nicklaus, makes its way through the desert while providing breathtaking views of Lake Las Vegas. Sculpted from the terrain's natural contours with strategic bunkering and pristine greens, the course features three waterfalls and plays around arroyos and water. Five holes are located along one and a half miles of the majestic Lake Las Vegas shoreline. Reflection Bay highlights include the picturesque 199-yard, par-3 eighth hole and beaches, bunkers and palms that create a dynamic shoreline and backdrop.

The Reflection Bay Golf Club is conveniently located just a few steps from the Loews Lake Las Vegas Resort. Transportation by shuttle will be provided from the Ritz-Carlton and the Loews Resort. The shuttle will depart from the main lobby of the Ritz-Carlton at 6:30am and will pick up at the Loews Resort at 6:45am to allow time on the driving range and prepare for an 8:00am shotgun start. Green fees, cart fees, driving range, bag tag, divot tool, box lunch and transportation are included in the event fee of \$230 per person. Club rental is available for an additional fee.

FRIDAY, JANUARY 18

11:00AM – 1:00PM

Marssa Restaurant, Loews

Cooking Demonstration with Master Sushi Chef & Luncheon

(Ticketed Event – \$80; Limited quantities available)

Chef Osama “Fuji” Fujita brings a unique approach to Pacific Rim cuisine as Executive Sushi Chef at Loews Lake Las Vegas Resort’s Marssa restaurant. Chef Fuji’s culinary technique is grounded in the traditions of Japanese cuisine and is strongly influenced by the flavors of the Pacific Rim and the California coast.

As the only Master Sushi Chef in the state of Nevada, the Japan native brings with him years of culinary training and the ancient secrets of the Orient. Chef Fuji, the son of the personal chef to the Emperor of Japan, spent over a decade training under one of only three master chefs in Tokyo. Fuji immersed himself in Japan’s culinary scene at a young age and studied with some of the country’s most renowned chefs. He later brought his talents to the west when he moved to Los Angeles and worked as a sushi chef in the city’s Little Tokyo area and later in San Diego.



ACTIVITIES

Fuji relocated to the Moroccan themed Lake Las Vegas Resort in 1999 and in his nine years at the resort, he has developed a following among the local residents, his peers and the press. Today, he can be found behind the sushi bar serving innovative dishes that delight the senses and satisfy every guest's tastes.

Join Chef Fuji in Marssa restaurant for a private demonstration on the preparation and history of sushi. Chef Fuji will prepare a few of his favorite sushi rolls, teach you the basics of making sushi and explain all of the interesting facts about sushi and its history. After the sushi demonstration, guests will be seated for a sake tasting and lunch. Lunch will include a sampling of Chef Fuji's sushi as well as a Pacific Rim-themed entrée and dessert.

A shuttle bus will depart from the main lobby of the Ritz-Carlton at 10:45am for the Loews Resort.

SATURDAY, JANUARY 19

10:00AM – 12:00PM

Casino MonteLago

Blackjack Lesson and Mini-Tournament

(Ticketed Event – \$40)

Take this opportunity to learn the fundamentals of blackjack in a true casino environment! The tournament will be held at private blackjack tables at the Casino MonteLago and will begin with a short tutorial by professional dealers on the basics of blackjack. Participants will be given tournament chips and after a few practice rounds, the tournament will begin! Don't miss your chance to be crowned the Tax Section's cardshark! Prizes will be awarded to the top participants.

A shuttle bus will depart from the main lobby of the Loews at 9:30am and will pickup at the Ritz-Carlton at 9:45am to arrive at the Casino MonteLago by 10:00am.

ALPHA SCHEDULE



- = Taped
- ★ = Young Lawyers Program
- = Ethics Credit Requested
- = No CLE Credit

COMMITTEE NAME	DAY	TIME	ROOM	PAGE
ACTC				
Board of Regents Meeting <i>(Executive Session)</i>	Sat.	7:30a–9:30a	Tuscany, Garden Level, Ritz	43
Administrative Practice	Fri.	8:30a–11:30a	Casablanca E, Loews	10
Luncheon <i>(Ticketed)</i>	Fri.	12:30p–1:30p	Casablanca E, Loews	23
Dinner <i>(Invitation Only)</i>	Thu.	6:00p–10:00p	Zefferino, Venetian	7
Affiliated & Related Corporations	Fri.	8:00a–11:00a	Casablanca C, Loews	9
Luncheon <i>(Ticketed)</i>	Fri.	12:00p–1:30p	Casablanca C, Loews	23
Appointments to the Tax Court <i>(Executive Session)</i>	Fri.	11:30a–12:30p	Rabat A, Loews	22
Banking and Savings Institutions	Fri.	8:30a–11:30a	Casablanca F, Loews	11
Luncheon <i>(Ticketed)</i>	Fri.	12:30p–1:30p	Casablanca F, Loews	23
Bankruptcy & Workouts	Fri.	2:30p–5:30p	Kenitra A, Loews	29
Business Cooperatives & Agriculture	NOT MEETING			
Luncheon <i>(Ticketed)</i>	Fri.	12:30p–1:30p	Safi, Loews	23
Capital Recovery & Leasing	Fri.	7:00a–9:00a	Casablanca G, Loews	8
SECTION PROGRAM: Proposed Regulations on Capitalizing Costs of Acquiring and Improving Tangible Assets	Sat.	2:00p–4:00p	Casablanca G, Loews	53
Civil and Criminal Tax Penalties	Sat.	8:30a–11:30a	Casablanca D, Loews	44
Luncheon <i>(Ticketed)</i>	Fri.	12:30p–1:30p	Casablanca B, Loews	23
Closely Held Businesses	Fri.	8:30a–11:30a	Casablanca B, Loews	12
	Fri.	2:30p–5:30p	Casablanca B, Loews	30
Committees	NOT MEETING			
Committee Chairs, Vice-Chairs, Officers and Council Breakfast	Sat.	7:30a–8:15a	Casablanca F, Loews	43
Companions' Activities:				
Cooking Demo & Luncheon <i>(Ticketed)</i>	Fri.	11:00a–1:00p	Marssa Restaurant, Loews	58
Blackjack Lesson & Tournament <i>(Ticketed)</i>	Sat.	10:00a–12:00p	Casino MonteLago	59



ALPHA SCHEDULE

COMMITTEE NAME	DAY	TIME	ROOM	PAGE
Companions' Breakfast ☕ <i>(Complimentary)</i>	Fri.	8:30a–9:30a	Baraka, Loews	13
Corporate Tax ☑ Luncheon ☕ <i>(Ticketed)</i>	Sat. Fri.	8:30a–11:30a 12:00p–1:30p	Casablanca E, Loews Casablanca C, Loews	45 23
Court Procedure & Practice ☑ Luncheon ☕ <i>(Ticketed)</i>	Fri. Fri.	2:30p–5:30p 12:30p–1:30p	Casablanca E, Loews Casablanca E, Loews	30 23
Officers & Subcommittee Chairs Breakfast ☕ <i>(Ticketed)</i>	Sat.	7:45a–9:00a	Casablanca A, Loews	43
Roundtable Discussion ☑ ★	Fri.	1:30p–2:30p	Kenitra A, Loews	26
Distinguished Service Award ☕ <i>(Executive Session)</i>	Fri.	9:00a–10:00a	Safi, Loews	19
Diversity ☑ ★	Fri.	4:00p–6:30p	Vineyard, Garden Level, Ritz	40
Reception ★ ☕	Fri.	5:30p–6:30p	Tuscany, Garden Level, Ritz	41
Employee Benefits ☑ ☕	Fri. Sat.	2:30p–5:30p 9:00a–12:00p	MonteLago I&II, Garden Level, Ritz Salon I, Lobby Level, Ritz	31 48
Reception/Cash Bar ☕	Fri.	5:35p–6:30p	MonteLago Foyer, Garden Level, Ritz	32
SECTION PROGRAM: Everything You Need to Know About the New PPA'06 Funding Requirements, but Haven't Had Time to Learn ☑	Sat.	2:00p–4:00p	Salon I, Lobby Level, Ritz	52

Employee Benefits Subcommittees and Task Force Update Programs:

Controlled Groups; Affiliated Services Group; Employee Status	Fri.	10:15a–11:15a	Vineyard, Garden Level, Ritz	21
Corporate Counsel Forum	Sat.	8:00a–9:00a	Village Boardroom, Garden Level, Ritz	43
Defined Benefit Plans	Sat.	7:00a–8:00a	Monte Vista, Garden Level, Ritz	42
Defined Contribution Plans; Task Force On Electronic Plan Administration/Vendor Management	Fri.	10:15a–12:00p	Orchard, Garden Level, Ritz	21

ALPHA SCHEDULE



COMMITTEE NAME	DAY	TIME	ROOM	PAGE
Distributions	Fri.	1:15p–2:30p	Vineyard, Garden Level, Ritz	25
EEOC Issues; FMLA; Military and Other Leaves	Fri.	11:15a–12:15p	Salon IV, Lobby Level, Ritz	22
ESOPs Update	Fri.	9:15a–10:15a	Olive Grove, Garden Level, Ritz	20
Executive Compensation; Federal Securities Laws Issues; Fringe Benefits	Fri.	8:30a–10:15a	MonteLago I, Garden Level, Ritz	13
Exempt Organizations; Government Plans	Fri.	1:15p–2:30p	Salon IV, Lobby Level, Ritz	25
Fiduciary Responsibility/Plan Investments; Litigation; ESOPs	Fri.	10:15a–12:00p	MonteLago I, Garden Level, Ritz	21
Foreign and International Issues	Fri.	12:00p–1:15p	Orchard, Garden Level, Ritz	24
Mergers and Acquisitions	Fri.	1:15p–2:30p	Salon III, Lobby Level, Ritz	25
Pension Legislation	Fri.	1:15p–2:30p	Orchard, Garden Level, Ritz	25
Self Correction; Determination Letters; Other Administrative Practices	Fri.	8:30a–10:15a	Tuscany, Garden Level, Ritz	13
Welfare Plan Design and Funding; Cafeteria Plans Reimbursement	Fri.	8:30a–10:15a	Salon III, Lobby Level, Ritz	14
Accounts and HIPAA; COBRA and State Insurance Regulation of Welfare Plans				
Young Lawyers in Employee Benefits Forum ★	Fri.	12:15p–1:15p	Village Boardroom, Garden Level, Ritz	24
Employment Taxes ☞	Fri.	1:30p–4:30p	Fez B, Loews	26
Energy & Environmental Taxes ☞	Fri.	2:30p–5:30p	Casablanca G, Loews	32
Estate & Gift Taxes ☞	Fri.	8:30a–11:30a	Casablanca A, Loews	14
Luncheon ☞ (Ticketed)	Fri.	12:30p–1:30p	Casablanca A, Loews	23
Young Lawyer Subcommittee ★ ☞	Fri.	1:30p–2:30p	Rabat A, Loews	27
Exempt Organizations ☞ ☞	Fri.	8:30a–4:15p	Salon II, Lobby Level, Ritz	14
Cash Bar ☞	Fri.	4:15p	Salon I, Foyer Lobby Level, Ritz	15
Luncheon ☞ (Ticketed)	Fri.	12:45p–2:00p	Salon II, Lobby Level, Ritz	23



ALPHA SCHEDULE

COMMITTEE NAME	DAY	TIME	ROOM	PAGE
Exempt Organizations Subcommittees:				
Audits and Appeals; Political & Lobbying & Organizations and Activities; Religions Organizations	Fri.	7:30a–8:30a	Vineyard, Garden Level, Ritz	8
Health Care Organizations	Fri.	7:30a–8:30a	Tuscany, Garden Level, Ritz	9
Private Foundations; Unrelated Business Income and International Philanthropy	Fri.	7:30a–8:30a	Orchard, Garden Level, Ritz	9
Fiduciary Income Tax 🗳️				
Luncheon 🗳️ (Ticketed)	Fri.	8:30a–11:30a	Kenitra B, Loews	45
Young Lawyers Subcommittee ★ 🗳️	Fri.	12:30p–1:30p	Casablanca A, Loews	23
	Fri.	1:30p–2:30p	Rabat A, Loews	27
Financial Transactions 🗳️				
Luncheon 🗳️ (Ticketed)	Fri.	2:30p–5:30p	Casablanca C, Loews	33
	Fri.	12:30p–1:30p	Casablanca F, Loews	23
First Time Attendee Orientation ★ 🗳️				
	Fri.	7:00a–7:30a	Rabat A, Loews	8
Foreign Activities of US Taxpayers 🗳️				
Business Meeting ★ 🗳️	Fri.	3:30p–5:30p	Salon I, Lobby Level, Ritz	40
Dinner ★ 🗳️	Fri.	5:30p–6:30p	Olive Grove, Garden Level, Ritz	41
(Reservations Required)	Fri.	7:45p–10:00p	Rotunda Room, Reflection Bay	41
Joint Program	Fri.	10:30a–12:00p	Salon I, Lobby Level, Ritz	22
Luncheon 🗳️ (Ticketed)	Fri.	12:00p–1:30p	Salon I, Lobby Level, Ritz	23
SECTION PROGRAM:				
Your Client's First Foreign Subsidiary: The Tax Basics that You Both Need to Know 🗳️ ★	Sat.	2:00p–4:00p	Salon III, Lobby Level, Ritz	54
Foreign Lawyers Forum 🗳️				
Business Meeting 🗳️	Fri.	1:30p–3:30p	Salon I, Lobby Level, Ritz	28
Dinner ★ 🗳️	Fri.	5:45p–6:30p	Village Boardroom, Garden Level, Ritz	41
(Reservations Required)	Fri.	7:45p–10:00p	Rotunda, Reflection Bay	41
Joint Program	Fri.	10:30a–12:00p	Salon I, Lobby Level, Ritz	22
Luncheon 🗳️ (Ticketed)	Fri.	12:00p–1:30p	Salon I, Lobby Level, Ritz	23
Formation of Tax Policy NOT MEETING				

ALPHA SCHEDULE



COMMITTEE NAME	DAY	TIME	ROOM	PAGE
Golf Outing 🎟️ (Ticketed)	Thu.	7:00a–2:00p	Reflection Bay Golf Course	7
Government Relations	NOT MEETING			
Government Submissions	NOT MEETING			
Hospitality Center	Fri.	7:00a–4:00p	Medinas Foyer, Loews	8
(Complimentary)	Fri.	7:00a–4:00p	Ballroom Foyer, Lobby Level, Ritz	8
	Sat.	7:00a–4:00p	Medinas Foyer, Loews	8
	Sat.	7:00a–4:00p	Ballroom Foyer, Lobby Level, Ritz	8
Individual & Family Taxation 🗳️	Fri.	8:30a–11:30a	Casablanca H, Loews	16
Insurance Companies 🗳️	Fri.	2:30p–5:30p	Kenitra B, Loews	34
Luncheon 🎟️ (Ticketed)	Fri.	12:30p–1:30p	Casablanca F, Loews	23
Investment Companies 🗳️	Fri.	9:30a–12:30p	Casablanca G, Loews	20
Luncheon 🎟️ (Ticketed)	Fri.	12:30p–1:30p	Casablanca F, Loews	23
Low Income Taxpayers 🗳️	Sat.	7:00a–9:00a	Casablanca B, Loews	42
Membership & Marketing 🎟️	Fri.	12:00p–1:00p	Fez A, Loews	24
NewsQuarterly Editorial Board	NOT MEETING			
Nominating 🎟️ (Executive Session)	Fri.	2:00p–5:00p	Tangier, Loews	29
Officers and Council Meeting 🎟️ (Executive Session)	Thu.	9:00a–12:00p	Casablanca A&B, Loews	7
Partnerships & LLCs 🗳️	Fri.	2:30p–5:30p	Casablanca D, Loews	35
Breakfast ★ 🎟️ (Ticketed)	Sat.	7:15a–8:30a	Casablanca G&H, Loews	43
Dinner ★ 🎟️	Thu.	6:30p–9:30p	Rotunda, Reflection Bay	7
(Reservations Required)				
LLC Subcommittee	Sat.	8:30a–10:30a	Tangier, Loews	46
Luncheon ★ 🎟️ (Ticketed)	Fri.	12:30p–1:30p	Casablanca D, Loews	23
Pro Bono 🗳️ ★	Sat.	9:00a–10:30a	Casablanca B, Loews	49
Professional Services 🎟️	Fri.	5:00p–6:00p	Tangier, Loews	41
Programs & Meetings 🎟️	Fri.	5:00p–6:00p	Fez A, Loews	41
Publications 🎟️	Sat.	11:30a–12:30p	Tangier, Loews	50



ALPHA SCHEDULE

COMMITTEE NAME	DAY	TIME	ROOM	PAGE
Real Estate	Fri.	8:30a–11:30a	Casablanca D, Loews	16
Breakfast ★ (Ticketed)	Sat.	7:15a–8:30a	Casablanca G&H, Loews	43
Dinner ★	Thu.	6:30p–9:30p	Rotunda, Reflection Bay	7
(Reservations Required)				
Luncheon ★ (Ticketed)	Fri.	12:30p–1:30p	Casablanca D, Loews	23
Resolutions		NOT MEETING		
S Corporations	Fri.	8:30a–12:30p	Kenitra A&B, Loews	18
Breakfast ★ (Ticketed)	Sat.	7:15a–8:30a	Casablanca G&H, Loews	43
Sales, Exchanges and Basis	Sat.	8:30a–11:45a	Rabat A&B, Loews	46
SECTION PROGRAM:	Sat.	2:00p–4:00p	Casablanca G, Loews	53
Proposed Regulations on Capitalizing Costs of Acquiring and Improving Tangible Assets				
Section Luncheon/Plenary Session ★ (Ticketed)	Sat.	12:30p–2:00p	Casablanca D, Loews	50
Section Reception (Ticketed)	Fri.	6:30p–8:00p	Salon II,III&IV, Lobby Level, Ritz	41
Simplification (Executive Session)	Sat.	9:00a–11:30a	Kenitra A, Loews	50
Special Projects		NOT MEETING		
Sponsorships	Fri.	3:00p–4:00p	Fez A, Loews	39
Standards of Tax Practice	Sat.	2:00p–4:30p	Casablanca F, Loews	51
State and Local Taxes	Fri.	2:30p–6:00p	Casablanca H, Loews	36
A Review of Recent State & Local Tax Developments	Fri.	1:00p–1:30p	Casablanca H, Loews	24
Cash Bar and Executive Business Meeting Dinner (Executive Session)	Thu.	6:30p–10:00p	Rabat A, Loews	7
In-House Counsel Roundtable	Fri.	10:30a–11:30a	Agadir B, Loews	22
(Executive Session)				
Luncheon (Ticketed)	Fri.	12:30p–1:00p	Casablanca H, Loews	23
Practitioners' Roundtable	Sat.	9:00a–10:30a	Fez A&B, Loews	49
(Executive Session)				
SECTION PROGRAM:	Sat.	2:00p–4:00p	Casablanca C, Loews	54
Status of Streamlined Sales Tax Project				
State & Local Tax Lawyer	Sat.	10:30a–11:00a	Fez A&B, Loews	50
Task Force on Patenting Tax Strategies	Fri.	7:30a–8:30a	Safi, Loews	9

ALPHA SCHEDULE



COMMITTEE NAME	DAY	TIME	ROOM	PAGE
Tax Accounting ☒	Fri.	2:30p–5:30p	Casablanca F, Loews	37
SECTION PROGRAM:				
Proposed Regulations on Capitalizing Costs of Acquiring and Improving Tangible Assets ☒	Sat.	2:00p–4:00p	Casablanca G, Loews	53
Tax Exempt Financing ☒	Fri.	2:30p–5:30p	Casablanca A, Loews	38
Luncheon 🍷 (Ticketed)	Fri.	12:30p–1:30p	Casablanca F, Loews	23
Tax Practice Management ☒ 🍷	Sat.	7:00a–8:30a	Casablanca C, Loews	43
Tax Shelters 🍷	Fri.	11:00a–1:00p	Tangier, Loews	22
Teaching Taxation ☒ ★	Fri.	1:30p–3:00p	Rabat B, Loews	29
SECTION PROGRAM:				
Current Developments in Individual, Corporate, Partnerships and Estate & Gift Taxation ☒ ★	Sat.	2:00p–5:00p	Casablanca B, Loews	52
<i>The Tax Lawyer</i>	NOT MEETING			
Transfer Pricing ☒ 🍷	Sat.	8:30a–10:30a	Salon III, Lobby Level, Ritz	47
Dinner ★ 🍷	Fri.	7:45p–10:00p	Rotunda Room, Reflection Bay	41
<i>(Reservations Required)</i>				
Joint Program	Fri.	10:30a–12:00p	Salon I, Lobby Level, Ritz	22
Luncheon 🍷 (Ticketed)	Fri.	12:00p–1:30p	Salon I, Lobby Level, Ritz	23
US Activities of Foreigners & Tax Treaties ☒ ★	Fri.	8:30a–10:30a	Salon I, Lobby Level, Ritz	19
Business Meeting ★ 🍷	Fri.	5:45p–6:30p	Orchard, Garden Level, Ritz	41
Dinner ★ 🍷	Fri.	7:45p–10:00p	Rotunda Room, Reflection Bay	41
<i>(Reservations Required)</i>				
Joint Program	Fri.	10:30a–12:00p	Salon I, Lobby Level, Ritz	22
Luncheon 🍷 (Ticketed)	Fri.	12:00p–1:30p	Salon I, Lobby Level, Ritz	23
VAT & Other Consumption Taxes ☒	Fri.	4:10p–5:00p	Casablanca H, Loews	36
Young Lawyers Forum ☒ ★	Fri.	4:00p–6:30p	Vineyard, Garden Level, Ritz	40
2007 Law Student Tax Challenge ☒ ★ 🍷				
Semi-Final Rounds	Fri.	9:00a–12:00p	Deserto & Lago, Garden Level, Ritz	19
<i>(Open to Public)</i>				
Final Rounds <i>(Open to Public)</i>	Fri.	3:00p–5:00p	Deserto & Lago, Garden Level, Ritz	24
Reception ★ 🍷	Fri.	5:30p–6:30p	Tuscany, Garden Level, Ritz	41

FUTURE MEETINGS/ CLE CALENDAR

SECTION MEETING CALENDAR | www.abanet.org/tax/calendar

DATE	PROGRAM	LOCATION
May 8 – 10, 2008 Sept. 11 – 13, 2008	May Meeting Joint Fall CLE Meeting Co-Sponsored with the Trust & Estate division of RPTE	Grand Hyatt, Washington, DC Hyatt Regency, San Francisco, CA
Jan. 8 – 10, 2009 May 7 – 9, 2009 Sept. 24 – 26, 2009	Midyear Meeting May Meeting Joint Fall CLE Meeting Co-Sponsored with the Trust & Estate division of RPTE	Sheraton, New Orleans, LA Grand Hyatt, Washington, DC Hyatt Regency, Chicago, IL
Jan. 14 – 16, 2010 May 6 – 8, 2010 Sept. 23 – 25, 2010	Midyear Meeting May Meeting Joint Fall CLE Meeting Co-Sponsored with the Trust & Estate division of RPTE	Hyatt Regency, Denver, CO Grand Hyatt, Washington, DC Sheraton, Toronto, ON

CLE CALENDAR | www.abanet.org/tax/calendar

DATE	PROGRAM	ABA INFORMATION
Jan. 30, 2008	“Last Wednesday” CLE Teleconference Organized by the Tax Accounting Committee	ABA Service Center www.abanet.org/cle 800.285.2221
Jan. 30, 2008	“Last Wednesday” CLE Teleconference Organized by the Administrative Practice Committee	ABA Service Center www.abanet.org/cle 800.285.2221
March 9 – 14, 2008	ABA/IPT Tax Seminars: Income Tax, Sales/Use Tax, Property Tax The Ritz-Carlton, New Orleans, LA	Tax Section www.abanet.org/tax 202.662.8670
April 3 – 4, 2008	8th Annual Tax Planning Strategies – U.S. and Europe Conference Madrid, Spain	Tax Section www.abanet.org/tax 202.662.8670
April 10 – 11, 2008	ALI-ABA Course of Study: Corporate Tax Hilton Embassy Row, Washington, DC	ALI-ABA www.ali-aba.org 800.CLE.NEWS
June 5 – 6, 2008	US – Latin America Tax Planning Strategies Conference Miami, FL	Tax Section www.abanet.org/tax 800.CLE.NEWS
June 5 – 6, 2008	ALI-ABA Course of Study: Charitable Giving Techniques Langham Hotel, Boston, MA	ALI-ABA www.ali-aba.org 800.CLE.NEWS
June 12 – 13, 2008	ALI-ABA Course of Study: How To Handle a Tax Controversy at the IRS and in Court Renaissance Chicago Hotel, Chicago, IL	ALI-ABA www.ali-aba.org 800.CLE.NEWS

SECTION OF TAXATION

2008 MIDYEAR MEETING



Thank you for joining us. We look forward to seeing you at a future event.

VISIT THE TAX SECTION'S WEBSITE AT: www.abanet.org/tax/

- Section *NewsQuarterly* and *The Tax Lawyer* Online
- News about upcoming Section Meetings and online registration
- Recent Government Submissions and Testimony
- Comm-Online (online, searchable database of committee program material)
- Membership Directory
- Extensive links to other helpful tax sites



Section of Taxation

740 15th Street, NW
Washington, DC 20005
202-662-8670

