MAY 29–30, 2014 • JW MARRIOTT HOTEL • WASHINGTON, D.C.

26TH ANNUAL
INSURANCE TAX SEMINAR

A DIALOGUE WITH GOVERNMENT PERSONNEL ON INSURANCE COMPANY AND PRODUCT TAX ISSUES

PRESENTED BY THE FEDERAL BAR ASSOCIATION SECTION ON TAXATION
IN CONJUNCTION WITH THE OFFICE OF CHIEF COUNSEL, INTERNAL REVENUE SERVICE

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26TH ANNUAL
INSURANCE TAX SEMINAR

SCHEDULE OF EVENTS

Thursday, May 29

7:45–8:45 a.m. Registration (Open All Day) and Continental Breakfast

8:45–8:55 a.m. Introduction And Welcome By The Seminar Coordinators
Lori J. Jones, Scribner, Hall & Thompson LLP
Sheryl B. Flum, Branch Chief, Insurance Branch, FI&P, Office of Chief Counsel, IRS

9:00–9:45 a.m. Session 1: Opening Plenary Session: Overview of New and Likely IRS Guidance on Insurance Tax Issues
Peter J. Bautz, American Council of Life Insurers (Moderator)
Sheryl B. Flum, Branch Chief, Insurance Branch, FI&P, Office of Chief Counsel, IRS
Stefan Gottschalk, Program Manager, Issue Practice Groups Team 4, Large Business & International, IRS
Lori Robbins, Attorney-Advisor, U.S. Department of Treasury

9:50–10:45 a.m. Session 2A: Life Insurance Company Audit Update
Patrick J. Styles, KPMG LLP (Moderator)
Donald J. Drees, Senior Technician Reviewer, Insurance Branch, FI&P, Office of Chief Counsel, IRS
Stefan Gottschalk, Program Manager, Issue Practice Groups Team 4, Large Business & International, IRS
Marcia Lassman, John Hancock Life Insurance Company

Session 2B: Overview of Expense v. Capitalization Issues in the Insurance Industry
Jan Skelton, Deloitte Tax LLP (Moderator)
Scott Dinwiddie, Special Counsel, IT&A, Office of Chief Counsel, IRS
Jennifer Kennedy, PricewaterhouseCoopers LLP
Amy Sargent, Ernst & Young LLP

Session 2C: Primer on the Role of the Joint Committee on Taxation in Legislation and Refunds
Jane Rohrs, Deloitte Tax LLP (Moderator)
Norman J. Brand, Senior Refund Counsel, Joint Committee on Taxation
Cecily W. Rock, Senior Legislation Counsel, Joint Committee on Taxation

10:45–11:15 a.m. Break

11:20 a.m.–12:15 p.m. Session 3A: Property Casualty & Health Insurance Companies Audit Update
Gregory K. Oyler, Scribner, Hall & Thompson LLP (Moderator)
Graham Green, Attorney, Insurance Branch, FI&P, Office of Chief Counsel, IRS
John R. Kryczka, PricewaterhouseCoopers LLP
Maureen Nelson, Ernst & Young LLP
Mary K. Roman, Large Business & International, IRS

Session 3B: Update on Issues Involving Variable Annuities from the Company Perspective
Arthur C. Schneider, Transamerica Corporation (Moderator)
Timothy Branch, Ernst & Young LLP
Alan Fu, Prudential Insurance Company of America
Anna Kozoulina, Special Counsel, Large Business & International, IRS
Sarah E. Lashley, Assistant to the Branch Chief, Insurance Branch, FI&P, Office of Chief Counsel, IRS

Session 3C: Trends in State Tax Reform
Dwaune Dupree, Property Casualty Insurers Association of America (Moderator)
Carl Erdmann, Skadden, Arps, Slate, Meagher & Flom LLP
Ferdinand Hogroian, Council of State Taxation
Scott Salmon, KPMG LLP

12:20–1:55 p.m. Session 4: Luncheon and Address
Introduction — *Lori J. Jones, Scribner, Hall & Thompson LLP*
Speaker — *To be determined*

2:00–2:55 p.m. **Session 5A: A Discussion of Current Tax Issues Affecting Life Insurance Reserves**
Kristen Norberg, Ernst & Young LLP (Moderator)
Richard Bush, Ameriprise Financial
Sharon Y. Horn, Attorney, Insurance Branch, FI&P, Office of Chief Counsel, IRS
Mark S. Smith, PricewaterhouseCoopers LLP

Session 5B: Current Tax Legislation Affecting the Insurance Industry
Doug P. Bates, Northwestern Mutual (Moderator)
E. Ray Beeman, Tax Counsel, House Ways and Means Committee (Invited)
Mark Prater, Chief Tax Counsel, Senate Finance Committee
Lisa Zarlenga, Tax Legislative Counsel, Office of Tax Policy, U.S. Department of Treasury

Session 5C: Important Items to Know When Negotiating an Insurance-Related Acquisition or Disposition
Christopher R. Tutoki, Deloitte Tax LLP (Moderator)
Aditi Banerjee, Prudential Insurance Company of America
Joseph Tedesco, XL Insurance
Anna Turkenich, PricewaterhouseCoopers LLP

3:00–3:55 p.m. **Session 6A: Practical Issues for Insurance Companies Under FATCA**
Jason Kaplan, Hogan Lovells US LLP (Moderator)
Christopher Cramer, The Hartford Financial Services Group
Josephine Firehock, Attorney, International, Office of Chief Counsel, IRS (Invited)
Stephen Musher, Associate Chief Counsel, International, Office of Chief Counsel, IRS (Invited)
Mandana Parsazad, American Council of Life Insurers

Session 6B: Developments in Life Insurance and Annuity Products
Robert A. Fishbein, Prudential Insurance Company of America (Moderator)
Shannon Gamache, Mass Mutual Financial Group
John Glover, Senior Counsel, Insurance Branch, FI&P, Office of Chief Counsel, IRS
Matin Momen, AXA Equitable

Session 6C: Best Practices When Dealing with IRS Appeals
Robert Gorey, Robert Gorey Consulting (Moderator)
Kenneth W. Black, Appeals, Team Case Leader, IRS
Sheldon M. Kay, Sutherland Asbill & Brennan LLP

3:55–4:25 p.m. Break

4:25–5:20 p.m. **Session 7A: Discussion on Capital Gain/Ordinary Income Mismatches and Recent Tax Developments**
Jeffrey Maddrey, PricewaterhouseCoopers LLP (Moderator)
Helen M. Hubbard, Associate Chief Counsel, FI&P, Office of Chief Counsel, IRS
Clarissa C. Potter, American Insurance Group, Inc.
Kevin P. Scheiderer, Nationwide Corporation

Session 7B: The Use of Annuity Contracts in Trusts
Bryan W. Keene, Davis & Harman LLP (Moderator)
Eric G. Lanning, Lincoln Financial Group
Kimberly W. Lunn, Allstate Financial
Alexis MacIvor, Attorney, Insurance Branch, FI&P, Office of Chief Counsel, IRS

Session 7C: Doing Business in Global Markets—A Focus on Asia
Surjya Mitra, PricewaterhouseCoopers LLP (Moderator)
Paul Aronoff, Prudential Insurance Company of America
Roberta Chang, Hogan Lovells International LLP

5:30–7:00 p.m. Reception—All Registrants Welcome

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Schedule of Events

Friday, May 30

7:45–8:25 a.m.	Registration (Open All Day) and Continental Breakfast
8:25–8:30 a.m.	Introduction/Reminders
8:30–9:15 a.m.	Second Plenary Session: Update on Tax Litigation in the Insurance Industry and Settlement Trends *J. Walker Johnson, Steptoe & Johnson LLP (Moderator)* *Arthur A. Catterall, Attorney, Appellate Section, Tax Division, U.S. Department of Justice* *Samuel A. Mitchell, Scribner, Hall & Thompson LLP* *David Pincus, Chief, Court of Federal Claims Section Tax Division, U.S. Department of Justice* *Tracy D. Williams, Sidley Austin LLP*
9:20–10:15 a.m.	Session 8A: Update on Recent Guidance Under the Affordable Care Act *Ken Robinson, Deloitte Tax LLP (Moderator)* *Rebecca L. Baxter, Attorney, Insurance Branch, FI&P, Office of Chief Counsel, IRS* *Donna M. Crisalli, Senior Level Counsel, IT&A, Office of Chief Counsel, IRS* *Charles J. Langley, Attorney, PS&I, Office of Chief Counsel, IRS* *Allison Ullman, Crowell & Moring LLP* Session 8B: Technical and Practical Considerations Relating to LLC/Partnership Investments *John Schaff, Sidley & Austin LLP (Moderator)* *Aaron Nocjar, Steptoe & Johnson LLP* *Cornelia Schnyder, Special Counsel, PS&I, Office of Chief Counsel, IRS* Session 8C: Tacking Rules and Life/NonLife Regulations *Christopher W. Schoen, Sutherland Asbill & Brennan LLP (Moderator)* *Mark Cavanaugh, State Farm Insurance Company* *Gerald B. Fleming, Senior Technician Reviewer, Corporate, Office of Chief Counsel, IRS* *Daniel Heins, Attorney, Corporate, Office of Chief Counsel, IRS*
10:15–10:45 a.m.	Break
10:45–11:40 a.m.	Session 9A: An Update on the OECD/BEPS Project *Mary C. Bennett, Baker & McKenzie LLP (Moderator)* *Jesse Eggert, Tax Council, OECD* *Robert Stack, Deputy Assistant Secretary for International Tax Affairs, Office of Tax Policy, U.S. Department of Treasury (Invited)* *Brenda Viehe-Naess, Washington Advocates Group* Session 9B: Ethics *Christopher S. Rizek, Caplin & Drysdale LLP (Moderator)* *MaryLou Soller, Miller & Chevalier LLP* Session 9C: Tax Developments on the Use of Cat Bonds *Saren Goldner, Sutherland Asbill & Brennan LLP (Moderator)* *Shlomo Boehm, Cadwalader, WIckersham & Taft LLP* *William Dubinsky, Willis Group* *David Remus, Attorney, Insurance Branch, FI&P, Office of Chief Counsel, IRS*
11:40 a.m. – 12:15 p.m.	Q&A/Wrap-up Panel *Peter H. Winslow, Scribner, Hall & Thompson LLP (Moderator)* *Sheryl B. Flum, Branch Chief, Insurance Branch, FI&P, Office of Chief Counsel, IRS* *Lori Robbins, Attorney-Advisor, U.S. Department of Treasury* *Kim Sellers, KPMG LLP*
12:20 p.m.	Box Lunches Available

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Hotel Reservations

A limited number of rooms are available at the seminar hotel, the JW Marriott Hotel, 1331 Pennsylvania Ave. NW, Washington, D.C. The room rate is $299/night for single occupancy. Reservations can be made by visiting www.marriott.com or calling (800) 228-9290 to speak with a central reservation agent. Reservations at special seminar rates must be made by May 7, 2014. Mention the Federal Bar Association Insurance Tax Seminar in order to obtain the special room rate.

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Registration Form

A registrant who cancels on or before May 9, 2014 will receive a full refund. No refunds will be made for cancellations received after May 9, 2014. Substitutions may be made at any time. All requests **must be received in writing**, addressed to the Office of Accounting at the FBA national office. For more information regarding refund, complaint, and/or program cancellation policies, please contact Melissa Schettler at mschettler@fedbar.org or (571) 481-9105. **Register online** at www.fedbar.org or **mail to:** 26th Annual Insurance Tax Seminar, 1220 North Fillmore St., Suite 444, Arlington, VA 22201. **Fax to:** (571) 481-9090.

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Lori J. Jones
Scribner, Hall & Thompson LLP

Sheryl B. Flum
Office of Chief Counsel, IRS

COORDINATING COMMITTEE

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Office of Chief Counsel, IRS

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