

MAY 28–29, 2015 • JW MARRIOTT HOTEL • WASHINGTON, D.C.

27TH 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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27TH ANNUAL INSURANCE TAX SEMINAR

SCHEDULE OF EVENTS

Thursday, May 28

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

8:45–8:55 a.m. Introduction and Welcome by the Seminar Coordinators Salon III/IV

Lori J. Jones, Scribner, Hall & Thompson LLP
Sarah E. Lashley, Assistant 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 Salon III/IV

Lori Robbins, KPMG LLP (*Moderator*)
Joseph McKeever, Davis & Harman LLP
Alexis MacIvor, Branch Chief, Insurance Branch, FI&P, Office of Chief Counsel, IRS
Rebecca L. Baxter, Senior Technician Reviewer, Insurance Branch, FI&P, Office of Chief Counsel, IRS

9:50–10:45 a.m. Session 2A: Life Industry and Tax Reserves Update Salon III/IV

Jeffrey J. Kohler, Pricewaterhouse Coopers LLP (*Moderator*)
James R. Eben, Northwestern Mutual Life Insurance Company
David Wunder, AXA-Equitable Life Insurance Company
Sarah E. Lashley, Assistant Branch Chief, Insurance Branch, FI&P, Office of Chief Counsel, IRS

Session 2B: Discussion of Proposed OECD Common Reporting Standards and Implementation Issues Under FATCA Salon DE

Michael Plowgian, KPMG LLP (*Moderator*)
Denise Hintzke, Deloitte LLP
Stuart Katz, Swiss Re
Julia Tonkovich, Attorney-Advisor, Office of International Tax Counsel, Treasury

Session 2C: M&A Due Diligence in the Insurance Industry Salon FG

Christine Lane, Hogan Lovells U.S. LLP (*Moderator*)
Aditi Banerjee, Prudential Financial, Inc.
Norman Hannawa, Ernst & Young LLP
Alison Peak, Davis & Harman LLP
Todd B. Reinstein, Pepper Hamilton LLP

10:45–11:15 a.m. Break

11:15 a.m.–12:15 p.m. Session 3A: Property Casualty & Health Insurance Industry UpdateSalon III/IV

Richard Riley, Foley & Lardner LLP (*Moderator*)
Pamela Biesecker, Nationwide Insurance Company
Rachel L. Levy, Groom Law Group
Rebecca L. Baxter, Senior Technician Reviewer, Insurance Branch, FI&P, Office of Chief Counsel, IRS

Session 3B: Update on IRS Procedure and Administration Salon DE

Ruth Perez, Pricewaterhouse Coopers LLP (*Moderator*)
Monique Ellenbogen, AIG
John R. Keenan, Deloitte LLP
Nancy Knapp, Associate Area Counsel, Large Business & International, Office of Chief Counsel, IRS
Christopher Larsen, Director, Planning, Analysis, Inventory & Research, Large Business & International, IRS

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- Session 3C: Life Actuarial Primer Salon FG**
Thomas C. Fineis, Deloitte LLP (*Moderator*)
Mary Elizabeth Caramagno, Prudential Financial, Inc.
Brian Prast, Massachusetts Mutual Life Insurance Company
S. Vincent Zink, Actuary, IRS
- 12:20–1:55 p.m. **Session 4: Luncheon and Address Salon I/II**
SPEAKER: Helen M. Hubbard, Associate Chief Counsel, FI&P, Office of Chief Counsel, IRS
- 2:00–2:55 p.m. **Session 5A: Current Tax Legislation Affecting
the Insurance Industry Salon III/IV**
Jonathan Traub, Deloitte LLP (*Moderator*)
George Callas, Majority Chief Tax Counsel, House Ways and Means Committee (Invited)
Michael Chesman, The Hartford
Ji Prichard, Tax Counsel, Ways & Means Committee Democratic staff
Todd Metcalf, Minority Chief Tax Counsel, Senate Finance Committee
Mark Prater, Majority Chief Tax Counsel, Senate Finance Committee
Karl Russo, Joint Committee on Taxation
- Session 5B: Corporate Reorganization and Consolidated
Return Developments Salon DE**
Jeffrey Vogel, KPMG LLP (*Moderator*)
William Alexander, Skadden Arps
Gary R. Vogel, Ernst & Young LLP
Gerald B. Fleming, Senior Technician Reviewer, Corporate, Office of Chief Counsel, IRS
Maury Passman, Branch Chief, Corporate, Office of Chief Counsel, IRS
- Session 5C: Developments in State Tax Controversies Salon FG**
Dawn Gabel, Steptoe & Johnson LLP (*Moderator*)
Eugene Capobianco, New York Life Insurance Company
Robert Sartori, V.P. and National Director, TriTech Tax Consulting
- 3:00–3:55 p.m. **Session 6A: The Latest on PFICs and Inversions
in the Insurance Industry Salon III/IV**
R. Lee Christie, Sidley & Austin LLP (*Moderator*)
Michael Mollerus, Davis Polk
William R. Pauls, Sutherland
Josephine Firehock, Attorney, International, Office of Chief Counsel, IRS
Brett York, Attorney-Advisor, International Tax Counsel, Treasury
- Session 6B: Life and Annuity Products Update Salon DE**
Mark E. Griffin, Davis & Harman LLP (*Moderator*)
Michael Oleske, New York Life Insurance Company
Stephen D. Hooe, Special Counsel to the Associate Chief Counsel, FI&P, Office of Chief Counsel, IRS
William Evans, Attorney-Advisor, Benefits Tax Counsel, Treasury
- Session 6C: Primer on the Tax Treatment of Reinsurance Salon FG**
John W. Weber, Drinker Biddle & Reath LLP (*Moderator*)
Richard Glaser, Partner Re
Teresa L. Fitzgerald, KPMG LLP
Sharon Y. Horn, Attorney, Insurance Branch, Office of Chief Counsel, IRS

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- 3:55–4:25 p.m. Break**
- 4:25–5:20 p.m. **Session 7A: The Latest on Investments Salon III/IV**
Samuel A. Mitchell, Scribner Hall & Thompson LLP (*Moderator*)
Lee Bartlett, Protective Life Insurance Company
Thomas Gibbons, Pacific Life Insurance Company
David Silber, Deputy Associate Chief Counsel, FI&P, Office of Chief Counsel, IRS
Sarah E. Lashley, Assistant Branch Chief, Insurance Branch, FI&P, Office of Chief Counsel, IRS
- Session 7B: Capital Management Issues in Captive Insurance and Reinsurance Salon DE**
James Mannello, Deloitte LLP (*Moderator*)
Marilyn A. Lion, Debevoise & Plimpton LLP
Robert H. Myers, Morris, Manning & Martin LLP
- Session 7C: Update on Foreign Withholding and Excise Tax Issues Salon FG**
Michael Miles, Sutherland (*Moderator*)
Tracy D. Williams, Sidley Austin LLP
- 5:30–7:00 p.m. Reception—All Registrants Welcome Pennsylvania Ave. Terrace**

Friday, May 29

- 7:45–8:25 a.m. Registration (Open All Day) and Continental Breakfast Salon III Foyer**
- 7:45–8:25 a.m. **Networking Breakfast Salon II**
Hot Topics According To Trade Association Representatives
Representatives from American Council of Life Insurers (Pete Bautz/Mandana Parsazad), Property Casualty Insurers Association of America (Tom Glassic/Dwaune Dupree), National Association of Mutual Insurance Companies (Irica Solomon), American Insurance Association (David Pearce), and Reinsurance Association of America (Joseph Sieverling)
- 8:25–8:30 a.m. **Introduction/Reminders Salon III/IV**
- 8:30–9:15 a.m. **Second Plenary Session: Update on BEPS and a Discussion of How it Could Affect the Insurance Industry Salon III/IV**
Barbara Angus, Ernst & Young LLP (*Moderator*)
Michael Gaffney, Pricewaterhouse Coopers LLP
Seth Green, KPMG LLP
Douglas Poms, Senior Counsel, Office of International Tax Counsel, Treasury
- 9:20–10:15 a.m. **Session 8A: International Insurance Tax Issues Salon III/IV**
Angela J. Walitt, Baker & McKenzie LLP (*Moderator*)
David A. Schenck, Pricewaterhouse Coopers LLP
Bruce Cohen, General Reinsurance
Steven D. Jensen, Senior Counsel, International, Office of Chief Counsel, IRS

SCHEDULE OF EVENTS

Session 8B: The Future of Reserves: Statutory, Accounting and Tax Salon DE

Peter H. Winslow, Scribner Hall & Thompson LLP (*Moderator*)
John Bruins, American Council of Life Insurers
Ann Cammack, Ernst & Young LLP
Kristin Norberg, Ernst & Young LLP

**Session 8C: New Change of Accounting Method Rules
and Discussion of Section 807(f) Issues Salon FG**

Susan Seabrook, Buchanan, Ingersoll & Rooney PC (*Moderator*)
Ellen McElroy, Sutherland
Craig Pichette, KPMG LLP
David Remus, Attorney, Insurance Branch, Office of Chief Counsel, IRS
Christopher W. Call, Attorney-Advisor, Treasury

10:15–10:45 a.m. Break

10:45–11:40 a.m. Session 9A: Litigation Update on What is Insurance Salon III/IV

Frederick J. Gelfond, Ernst & Young LLP (*Moderator*)
Tom Jones, McDermott Will & Emery LLP
M. Kristan Rizzolo, Sutherland
John Glover, Senior Counsel, Insurance Branch, Office of Chief Counsel, IRS

10:45–11:45 a.m. Session 9B: Ethics Salon DE

Rachel L. Partain, Caplin & Drysdale (*Moderator*)
Armando Gomez, Skadden Aarps
Thomas B. Mason, Harris, Wiltshire & Grannis
Karen L. Hawkins, Director, Office of Professional Responsibility, IRS

**11:45 a.m.–12:15 p.m. Q&A by Current and Former Insurance Branch
Chiefs/Wrap-Up Panel Salon III/IV**

Susan J. Hotine, Scribner Hall & Thompson LLP (*Moderator*)
Sheryl B. Flum, KPMG LLP
Mark S. Smith, Pricewaterhouse Coopers LLP
Alexis MacIvor, Branch Chief, Insurance Branch, Office of Chief Counsel, IRS

12:20 p.m. Box Lunches Available Salon II



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