

# 25th Annual Insurance Tax Seminar • Schedule of Events

Presented by the Federal Bar Association Section on Taxation in conjunction with the Office of Chief Counsel, Internal Revenue Service

Thursday, May 30

7:45–8:45 a.m.	<b>Registration (Open All Day) and Continental Breakfast</b> ..... Grand Ballroom Foyer
8:45–8:55 a.m.	<b>Introduction &amp; Welcome by the Seminar Coordinators</b> ..... Grand Ballroom III & IV Lori J. Jones, <i>Scribner, Hall &amp; Thompson LLP</i> Nancy Vozar Knapp, <i>Associate Area Counsel, LB&amp;I, Office of Chief Counsel, IRS</i>
9:00–9:45 a.m.	<b>Session 1: Opening Plenary Session: Tax Policy from the View of Economists</b> ..... Grand Ballroom III & IV Pamela Olson, <i>PricewaterhouseCoopers LLP</i> (Moderator) James B. Mackie III, <i>Director, Office of Tax Analysis, U.S. Department of Treasury</i> Karl Russo, <i>Economist, Joint Committee on Taxation</i> Eugene Steuerle, <i>Urban Institute</i>
9:50–10:50 a.m.	<b>Session 2A: Life Audit Update</b> ..... Grand Ballroom III & IV Craig L. Pichette, <i>KPMG LLP</i> (Moderator) Scott L. Lenz, <i>New York Life Insurance Company</i> Arthur C. Schneider, <i>Transamerica Corp.</i>
	<b>Session 2B: Overview of Captives/ Pools and Updates on What is Insurance</b> ..... Capitol Ballroom DE M. Kristan Rizzolo, <i>Sutherland Asbill &amp; Brennan LLP</i> (Moderator) Val J. Albright, <i>Gardere Wynne Sewell LLP</i> Robert H. Myers, Jr., <i>Morris, Manning &amp; Martin, LLP</i> Sharon Y. Horn, <i>Attorney, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i>
	<b>Session 2C: M&amp;A Tax Issues for Insurance Companies in the Current Environment</b> .....Capitol Ballroom FG Sherrie Winokur, <i>PricewaterhouseCoopers LLP</i> (Moderator) Seth L. Rosen, <i>Debevoise &amp; Plimpton LLP</i> Gerald B. Fleming, <i>Senior Technician Reviewer, Corporate, Office of Chief Counsel, IRS</i>
10:50–11:10 a.m.	<b>Break</b>
11:15 a.m.– 12:15 p.m.	<b>Session 3A: Property Casualty &amp; Health Audit Update</b> ..... Grand Ballroom III & IV Richard F. Riley, Jr., <i>Foley &amp; Lardner LLP</i> (Moderator) Dawn Cummings-Fritz, <i>Zurich North America</i> Robert Gorey, <i>Robert Gorey Consulting</i> Kevin M. Owens, <i>Owens Tax Consultants</i>
	<b>Session 3B: Variable Annuities, Hedging and the Related IIR</b> ..... Capitol Ballroom DE Eric J. Bisighini, <i>Hartford Life Insurance Company</i> (Moderator) Dean R. Hindman, <i>MassMutual Financial Group</i> Peter H. Winslow, <i>Scribner, Hall &amp; Thompson LLP</i>
	<b>Session 3C: Update on State Tax Issues</b> .....Capitol Ballroom FG Christine Gustafson, <i>C. Gustafson Law</i> (Moderator) Josie Lowman, <i>American International Group Inc.</i> James R. Williams, <i>Massachusetts Mutual Life Insurance Company</i>
12:20–1:55 p.m.	<b>Session 4: Luncheon &amp; Address</b> ..... Grand Ballroom I & II Samuel A. Mitchell, <i>Scribner, Hall &amp; Thompson LLP</i> (Introduction) William J. Wilkins, <i>Chief Counsel, IRS</i> (Speaker)
2:00–3:00 p.m.	<b>Session 5A: An Update on Tax Issues and Life Insurance Reserves</b> ..... Grand Ballroom III & IV Peter J. Bautz, <i>American Council of Life Insurers</i> (Moderator) Christian DesRochers, <i>Ernst &amp; Young LLP</i> Mark S. Smith, <i>PricewaterhouseCoopers LLP</i> Sheryl B. Flum, <i>Branch Chief, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i>
	<b>Session 5B: Current Tax Legislation Affecting the Insurance Industry</b> ..... Capitol Ballroom DE Jonathan Traub, <i>Deloitte Tax LLP</i> (Moderator) Lily Batchelder, <i>Chief Tax Counsel, Senate Finance Committee</i> (Invited) Alan T. Lee, <i>Tax Counsel, Rep. Sander Levin (D-MI)</i> Dave Olander, <i>Chief Majority Tax Counsel, House Ways and Means Committee</i> (Invited) Mark Prater, <i>Chief Tax Counsel, Senate Finance Committee</i>
	<b>Session 5C: Primer on Transfer Pricing</b> .....Capitol Ballroom FG Darrin Litsky, <i>Deloitte Tax LLP</i> (Moderator) Stephen R. Baker, <i>Ernst &amp; Young LLP</i> Brian Jenn, <i>Attorney-Advisor, Office of International Tax Counsel, U.S. Department of Treasury</i> Steven D. Jensen, <i>Senior Counsel, International, Office of Chief Counsel, IRS</i> Robert Z. Kelley, <i>Attorney, International, Office of Chief Counsel, IRS</i>
3:05–4:05 p.m.	<b>Session 6A: Insurance Branch Update</b> ..... Grand Ballroom III & IV Donald J. Drees, Jr., <i>Senior Technical Reviewer, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i> (Moderator) Graham R. Green, <i>Attorney, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i> Sarah E. Lashley, <i>Assistant to the Branch Chief, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i> Rebecca L. Baxter, <i>Attorney, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i> Linda K. Boyd, <i>Attorney, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i> David Remus, <i>Attorney, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i> Alexis A. MacIvor, <i>Attorney, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i> Sharon Y. Horn, <i>Attorney, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i> William Sullivan, <i>Attorney, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i> John E. Glover, <i>Senior Counsel, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i>

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## Schedule of Events (Continued)

	<b>Session 6B: Update on Transfer Pricing Issues in the Insurance Industry</b> ..... Capitol Ballroom DE Philip R. West, <i>Steptoe &amp; Johnson LLP</i> (Moderator) Mark J. Fidelman, <i>Deloitte Tax LLP</i> Brian Jenn, <i>Attorney-Advisor, Office of International Tax Counsel, U.S. Department of Treasury</i> Angela E. Holland, <i>Attorney, International, Office of Chief Counsel, IRS</i> Kenneth W. Wood, <i>Senior Manager, Advance Pricing &amp; Mutual Agreement Program, LB&amp;I, IRS</i>
4:05–4:25 p.m.	<b>Break</b>
4:30–5:30 p.m.	<b>Session 7A: Investments—Section 166, Remics, and LB&amp;I Directive Implementation Issues</b> ..... Grand Ballroom III & IV Richard G. Larkins, <i>Ernst &amp; Young LLP</i> (Moderator) Michael J. Pelzel, <i>Ameriprise Financial Inc.</i> Michael Yaghamour, <i>PricewaterhouseCoopers LLP</i> Anna Kozoulina, <i>Special Counsel, LB&amp;I, Office of Chief Counsel IRS</i>
	<b>Session 7B: Life and Annuity Products Update</b> ..... Capitol Ballroom DE Judith Jaffess, <i>Prudential Insurance Company of America</i> (Moderator) Frederic J. Gelfond, <i>Deloitte Tax LLP</i> Chris Phanco, <i>Pacific Life Insurance Company</i> John E. Glover, <i>Senior Counsel, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i>
	<b>Session 7C: Ethics and Expected Changes to Circular 230</b> .....Capitol Ballroom FG Fred Murray, <i>Grant Thornton LLP</i> (Moderator) Robert D. Probasco, <i>Thompson &amp; Knight LLP</i> Richard S. Goldstein, <i>Special Counsel, Procedure &amp; Administration, Office of Chief Counsel, IRS</i> Matthew D. Lucey, <i>Attorney, Procedure &amp; Administration, Office of Chief Counsel, IRS</i> John T. Manhire, <i>Chief, Legal Analysis Branch, Office of Professional Responsibility, Office of Chief Counsel, IRS</i>
5:30–7:00 p.m.	<b>Reception—All Registrants Welcome</b> ..... Garden Terrace Lobby (on the main level)
<b>Friday, May 31</b>	
7:45–8:25 a.m.	<b>Registration (Open All Day) and Continental Breakfast</b> ..... Grand Ballroom Foyer
7:45–8:25 a.m.	<b>Networking Breakfast (Primer on Statutory vs. Taxable Income)</b> .....Capitol Ballroom FG Rob Finnegan, <i>PricewaterhouseCoopers LLP</i> (Moderator) Steve Beaver, <i>Aflac Worldwide Headquarters</i>
8:25–8:30 a.m.	<b>Introduction/Reminders</b> .....Grand Ballroom III & IV
8:30–9:15 a.m.	<b>Second Plenary Session: The Future of the Insurance Industry from a Global Perspective</b> .....Grand Ballroom III & IV Gary Shaw, <i>Deloitte LLP</i> (Moderator) Philip Woolfson, <i>Steptoe &amp; Johnson LLP</i> Jamie Yoder, <i>PricewaterhouseCoopers LLP</i>
9:20–10:15 a.m.	<b>Session 8A: International Insurance Tax Issues</b> ..... Capitol Ballroom DE R. Lee Christie, <i>Sidley Austin LLP</i> (Moderator) Richard J. Hauser, <i>Zurich American Insurance Company</i> Michael R. Miles, <i>Sutherland, Asbill &amp; Brennan LLP</i> Steven D. Jensen, <i>Senior Counsel, International, Office of Chief Counsel, IRS</i> Steven Musher, <i>Associate Chief Counsel, International, Office of Chief Counsel, IRS</i>
	<b>Session 8B: Update on IRS Procedure &amp; Administration</b> ..... Grand Ballroom III & IV Kevin Brown, <i>PricewaterhouseCoopers LLP</i> (Moderator) Richard Frost, <i>Prudential Insurance Company of America</i> Heather C. Maloy, <i>Commissioner, LB&amp;I, IRS</i>
	<b>Session 8C: Information Reporting Update</b> .....Capitol Ballroom FG Steven M. Friedman, <i>KPMG LLP</i> (Moderator) Adrienne E. Griffin, <i>Attorney, Procedure &amp; Administration, Office of Chief Counsel, IRS</i> Nancy L. Rose, <i>Senior Counsel, Procedure &amp; Administration, Office of Chief Counsel, IRS</i>
10:15–10:25 a.m.	<b>Break</b>
10:25–11:25 a.m.	<b>Session 9A: Health Care/ACA Update</b> ..... Grand Ballroom III & IV Craig R. Springfield, <i>Davis &amp; Harman LLP</i> (Moderator) Monica M. Coakley, <i>KPMG LLP</i> Clayton Herbert, <i>Blue Cross Blue Shield Association</i> Jeanne Ross, <i>Senior Level Counsel to the Associate Chief Counsel, Passthroughs &amp; Special Industries, Office of Chief Counsel, IRS</i> Stephen Tackney, <i>Deputy Division Counsel/Deputy Associate Chief Counsel, Employee Benefits, Office of Chief Counsel, IRS</i>
	<b>Session 9B: Update on FATCA</b> ..... Capitol Ballroom DE Jean Male Baxley, <i>KPMG LLP</i> (Moderator) Ernest V. Molinari, <i>Prudential Insurance Company of America</i> Howard Stecker, <i>Ernst &amp; Young LLP</i> Josephine Firehock, <i>Attorney, International, Office of Chief Counsel, IRS</i> John J. Sweeney, <i>Branch Chief, International, Office of Chief Counsel, IRS</i> Brett York, <i>Attorney-Advisor, Office of the International Tax Counsel, U.S. Department of Treasury</i>
11:30 a.m. –12:15 p.m.	<b>Q&amp;A Panel</b> ..... Grand Ballroom III & IV Lori J. Jones, <i>Scribner, Hall &amp; Thompson LLP</i> (Moderator) Jean Male Baxley, <i>KPMG</i> Walter Welsh, <i>American Council of Life Insurers</i> Sheryl B. Flum, <i>Branch Chief, Insurance Branch, FI&amp;P, Office of Chief Counsel, IRS</i> Nancy Vozar Knapp, <i>Associate Area Counsel, LB&amp;I, Office of Chief Counsel, IRS</i>
12:20 p.m.	<b>Box Lunches Available</b>