



INSTITUTE OF INTERNATIONAL BANKERS

ANNUAL SEMINAR ON U.S. TAXATION OF INTERNATIONAL BANKS

June 12, 2017

**Offices of Skadden, Arps, Slate, Meagher & Flom LLP
4 Times Square**

8:30 – 8:55 a.m.

Continental Breakfast

8:55 – 9:00 a.m.

Welcome

Sally Miller

Chief Executive Officer
Institute of International Bankers

9:00 – 10:00 a.m.

Impact of Tax and Regulatory Changes Outside the U.S. on FBOs' U.S. Operations

The panel will discuss implications and potential consequences of major tax proposals and structural reform in other countries on U.S. tax positions and planning.

Humberto Reboredo
(moderator)

Managing Director and Head
of Tax, Americas
Credit Suisse

Jason Kaplan

Principal
Deloitte Tax LLP

Mark Leeds

Partner
Mayer Brown LLP

Philip R. West

Chair
Steptoe & Johnson LLP

10:00 – 11:00 a.m.

Tax and Regulatory Reform: New Administration – Different Outcome?

Michael Brown
(moderator)

Head of U.S. Tax
TD Bank Group

Richard Coffman

General Counsel
Institute of International Bankers



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Paul Oosterhuis Of Counsel
Skadden, Arps, Slate, Meagher & Flom LLP

Ellen Rottenberg Tax Partner
PwC

11:00 – 11:15 a.m.

Coffee Break

11:15 – 12:15 p.m. **Audit Controversies**

Beatrice Montaudy Director
(*moderator*) Barclays

Howard Berman Managing Director
Deloitte Tax LLP

Timothy Evans Manager
Mazars

Raj Madan Partner
Skadden, Arps, Slate, Meagher & Flom LLP

12:15 – 1:15 p.m.

Networking Luncheon

1:15 – 2:15 p.m. **Preparing to Comply with Sec. 385**

Frederick Campano Director, Tax Counsel
(*moderator*) Deutsche Bank AG

Jeffrey Hochberg Partner
Sullivan & Cromwell LLP

Mark Terrell Manager
Ernst & Young LLP

Justin Weiss Partner
KPMG LLP

2:15 – 2:45 p.m.

Coffee Break



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2:45 – 3:45 p.m.

CRS & 871(m): Satisfying New Reporting Requirements

Carla Pehowski
(moderator)

Managing Director, Senior Tax Counsel
Royal Bank of Canada

Lucy Farr

Partner
Davis Polk & Wardwell LLP

Tara Ferris

Principal
Ernst & Young LLP

Jeffrey Tate

Counsel
Shearman & Sterling LLP

3:45 – 4:45 p.m.

State and Local Tax Developments

Habibe (Bibi) Rubio
(moderator)

Head of U.S. Tax/Finance
Westpac Banking Corporation

Russell Levitt

Managing Director
KPMG LLP

Alysse McLoughlin

Partner
McDermott Will & Emery LLP

Scott Migliori

Director
PwC