



INSTITUTE OF INTERNATIONAL BANKERS

ANNUAL SEMINAR ON U.S. TAXATION OF INTERNATIONAL BANKS

June 22, 2016

City University of New York Graduate Center

365 Fifth Avenue

8:30 – 8:55 a.m.

Continental Breakfast

Sponsored by:



8:55 – 9:00 a.m.

Welcome

Sally Miller

Chief Executive Officer

Institute of International Bankers

9:00 – 10:00 a.m.

The Interface of Tax Issues and Financial Regulations

This panel will discuss tax considerations associated with how foreign financial institutions are regulated in the U.S., including issues related to enhanced prudential standards (e.g. IHC formation, living wills, stress tests, and proposed TLAC regulations) and expectations regarding transfer pricing.

Beatrice Montaudy
(moderator)

Director
Barclays

Barbara Mace

Partner
Ernst & Young LLP

Erika Nijenhuis

Partner
Cleary Gottlieb Steen & Hamilton LLP

Ellen Rotenberg

Partner
PwC

10:00 – 11:00 p.m.

Audit Controversies

Panelists will discuss trends they are seeing in audits and provide insight with respect to how changes at the IRS will affect future audits.

Michael Brown
(moderator)

Head of US Tax
TD Bank Group



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Susan Grbic

Partner
WeiserMazars LLP

Sharon Katz-Pearlman

Head of Dispute Resolution & Controversy
KPMG LLP

Raj Madan

Partner
Skadden, Arps, Slate, Meagher & Flom LLP

11:00 – 11:15 a.m.
Coffee Break

11:15 – 12:30 p.m.

Federal Tax Developments: Proposed Section 385 Regulations

This panel will discuss the recently proposed Sec. 385 regulations and their impact in particular on foreign-owned financial institutions.

Aaron Rubinstein
(moderator)

Regional Tax Director – Americas
Standard Chartered Bank

Paul Crispino

Principal
Deloitte Tax LLP

Yaron Reich

Partner
Cleary Gottlieb Stein & Hamilton LLP

Robert Rizzi

Partner
Steptoe & Johnson LLP

12:30 – 2:00 p.m.
Networking Luncheon

2:00 – 3:15 p.m.

Current State of Tax Operations

This panel will focus on the effect that recent and upcoming changes (including FATCA, CRS, and Sec. 305(c)) are having on tax departments and how tax operations are adapting to meet these new challenges.

Paul Heller
(moderator)

Managing Director, Taxation
U.S. Information Reporting
Royal Bank of Canada



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David Charlton	Principal Deloitte Tax LLP
Chip Collins	Managing Director UBS
Tara Ferris	Principal Ernst & Young LLP
Dirk Suringa	Partner Covington & Burling LLP

3:15 – 3:30
Coffee Break

3:30 – 4:45 p.m.

The State and Local Tax Landscape

Panelists will discuss the New York State and City tax changes being implemented, and address questions foreign banks are facing in trying to comply.

Habibe (Bibi) Rubio, MST <i>(moderator)</i>	Head of U.S. Tax/Finance Westpac Banking Corporation
Robert Plattner	Deputy Commissioner Office of Tax Policy Analysis NYS Department of Taxation and Finance
Anna Hoti	Director PwC
Russell Levitt	Managing Director KPMG LLP
Alysse McLoughlin	Partner McDermott Will & Emery LLP

4:45 p.m.
Adjournment



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