

3RD ANNUAL

IRS FINANCIAL SERVICES INDUSTRY CONFERENCE

SPONSORED BY THE NEW YORK CHAPTER OF THE TAX EXECUTIVES INSTITUTE

*The annual conference that addresses issues and topics relating specifically to taxpayers served by the Internal Revenue Service's Financial Services Industry (Large and Mid-Size Business Division).
CPE/CLE Credits available. Seating is limited.*

**September 22 and 23, 2003
Tavern on the Green
Central Park at West 67th Street
New York, New York
Rate: \$550 per participant**

AGENDA AS OF 8/7/03

Monday, September 22

8:15 – 9:00 Registration and Continental Breakfast

9:00 – 9:15

OPEN / WELCOME

- Paul DeNard, Director, Financial Services Industry
- Shaheda Sayed, TEI Moderator

9:15 – 10:30

GENERAL SESSION - UPDATES

This session will cover topics such as tax motivated transactions / promoters, legislation, claims, and new 'hot' issues. A brief question and answer period is included.

- Paul DeNard, Director, Financial Services Industry
- David Robison, Chief, IRS Appeals Division
- Emily Parker, Acting Chief Counsel
- Shaheda Sayed, TEI Moderator

10:30 – 10:45

Break

10:45 – 11:45

GENERAL SESSION – AUDIT CURRENCY: MANAGING AN AUDIT USING ALTERNATIVE DISPUTE RESOLUTION TOOLS

Is your company a good candidate for IRS pre and post filing initiatives? Get an update on how Pre-Filing Agreements, Fast Track Dispute Resolution, LIFE, can work toward currency.

- Paul Claytor, Senior Industry Advisor, Financial Services Industry
- David Robison, Chief, IRS Appeals Division
- Sharon Katz Pearlman, KPMG
- B. John Williams, Shearman & Sterling
- TEI Moderator Steve Rogozinski

11:45 – 1:15

LUNCH

Speaker: Emily Parker, Acting Chief Counsel

**BREAKOUT
SESSIONS**

1:15 – 2:45	A	<p>FOREIGN BANKING</p> <ul style="list-style-type: none"> ▪ Shelley Mitchell, LMSB Technical Advisor ▪ Vincent Guiliano LMSB Industry Counsel ▪ Leslie Samuels, Cleary, Gottlieb, Steen and Hamilton ▪ TEI Moderator Charles Cino
	B	<p>TAX MOTIVATED TRANSACTIONS</p> <p>Hear the IRS’ views on ‘disclose and discuss’ as well as enforcement.</p> <ul style="list-style-type: none"> ▪ Carl Weiss, LMSB Director Field Operations (Acting) ▪ Maria Stabile, LMSB Industry Counsel ▪ Tim Taggart, LMSB Technical Advisor ▪ B. John Williams, Shearman & Sterling ▪ TEI Moderator Alan Getz
	C	<p>LIFE INSURANCE</p> <p>LMSB actuaries and technical advisors will discuss life insurance issues such as the expanded program and software.</p> <ul style="list-style-type: none"> ▪ Allen D. Booth, LMSB Actuary ▪ Ron Hathaway, LMSB Insurance Program Manager ▪ John Prisco, LMSB Technical Advisor ▪ Diane Helfgott, LMSB Industry Counsel ▪ TEI Moderator Robert Levy

2:45– 3:00

Break

**BREAKOUT
SESSIONS**

3:00 – 4:15

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INFORMATION REPORTING AND WITHHOLDING

Discussion topics include bank deposit interest, 1099 cap reporting, audits of withholding agents, and the Qualified Intermediary Program.

- Thomas Chillemi, LMSB Manager (QI)
- Anthony Inzerillo, QI
- Jerry Michael, Chief IRB, Martinsburg Computing Center
- Carol A. Kassem, IRPAC member
- John J. Sweeney, LMSB Counsel
- TEI Moderator Paul Heller

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BANKING ISSUES

General guidance with examples.

- Mary Grady or Jody Botsford, LMSB Technical Advisors
- Vince Guiliano, LMSB Industry Counsel
- Paul Claytor, LMSB Senior Industry Advisor
- Dick Harvey PricewaterhouseCoopers
- TEI Moderator Les Honig

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REGULATORY REPORT: BOOK / TAX REPORTING & ENFORCEMENT IN THE POST-ENRON ENVIRONMENT

Panelists representing federal and state regulatory agencies and IRS' Criminal Investigation Division will talk about regulatory issues.

- Anne Marie Minogue, ASAC, IRS Criminal Investigation
- Dorothy Heyl, Senior Trial Counsel, Enforcement Division
U.S. Securities and Exchange Commission
- Patricia Coneys, Tax Audit Administrator, New York State Dept. of Taxation
- Brian McCann, Associate Attorney, New York State Dept. of Taxation
- Joseph Real, Senior VP & Tax Director, Metlife
- TEI Moderator Ben Chapman

4:15 - 5:15

Reception: Cocktails and hors d'oeuvres

TUESDAY, September 23

8:30 – 9: 15

Continental Breakfast

**BREAKOUT
SESSIONS**

9:15 – 10:30	G	<p>CAPTIVE AND PROPERTY & CASUALTY INSURANCE</p> <ul style="list-style-type: none"> ▪ Tim Collins, LMSB Technical Advisor ▪ Emily Hale, LMSB Technical Advisor ▪ Gerald Bell, LMSB Technical Advisor ▪ John Glover, IRS Chief Counsel ▪ Joseph Long, LMSB Industry Counsel ▪ TEI Moderator Alan Todryk
	H	<p>INTERNATIONAL TAXATION</p> <ul style="list-style-type: none"> ▪ Michael J. Sweeney, LMSB PFTG Manager ▪ John J. Sweeney, LMSB Counsel ▪ Hugh Rowland, Debevoise & Plimpton ▪ TEI Moderator Alan Getz
	I	<p>LIMITED ISSUE FOCUSED EXAMINATION</p> <ul style="list-style-type: none"> ▪ Jody Botsford , LMSB Technical Advisor ▪ Paul Claytor, LMSB Senior Industry Advisor ▪ Sharon Katz Pearlman, KPMG ▪ Dean Molyneaux, LMSB Team Manager ▪ TEI Moderator Barry Agranoff

10:30 – 10:45

Break

10:45 – 1	J	<p>MARK TO MARKET</p> <ul style="list-style-type: none"> ▪ Paul Claytor, LMSB Senior Industry Advisor ▪ Suzanne Boule, LMSB Technical Advisor ▪ Ted Leighton, LMSB Industry Counsel ▪ Lon Smith, Associate Chief Counsel, Financial Institutions and Products ▪ TEI Moderator Jeff Karp
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**BREAKOUT
SESSIONS**

	K	<p>CAPITALIZATION</p> <ul style="list-style-type: none"> ▪ Sharon Russell, LMSB Technical Advisor ▪ Andrew Keyso, IRS Chief Counsel ▪ Mary Grady, LMSB Technical Advisor ▪ TEI Moderator Steve Rogozinski
	L	<p>GLOBAL DEALING, TRANSFER PRICING AND THE APA PROCESS RELATING TO FINANCIAL INSTITUTIONS</p> <ul style="list-style-type: none"> ▪ Shelley Mitchell, LMSB Technical Advisor ▪ Matthew Frank, Director, IRS APA Program (invited) ▪ Christopher Faiferlick, Ernst & Young (invited) ▪ TEI Moderator Charles Cino
<p>12:00 – 1:30</p>	<p>LUNCH Speaker: Gregory F. Jenner, Deputy Assistant Secretary (Tax Policy) U.S. Treasury Department</p>	