

**3<sup>RD</sup> 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 67<sup>th</sup> Street**  
**New York, New York**  
**Rate: \$550 per participant**

**TENTATIVE AGENDA AS OF 7/15/03. PANELISTS IN BOLD HAVE CONFIRMED.**

**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**
- Appeals Division Representative (Robison / Ammons / Blanche or Tapley)
- **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.

- Mike Mann, Program Manager, LMSB PFTG
- Appeals Division Representative (Robison / Ammons / Blanche or Tapley)
- **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><b>FOREIGN BANKING</b></p> <ul style="list-style-type: none"> <li>▪ <b>Shelley Mitchell, LMSB Technical Advisor</b></li> <li>▪ <b>Vincent Guiliano LMSB Industry Counsel</b></li> <li>▪ Paul Epstein IRS Chief Counsel</li> <li>▪ Non-IRS panelist (Yaron Reich or Willard Taylor)</li> <li>▪ <b>TEI Moderator Charles Cino</b></li> </ul>
	B	<p><b>TAX MOTIVATED TRANSACTIONS</b> Hear the IRS’ views on ‘disclose and discuss’ as well as enforcement.</p> <ul style="list-style-type: none"> <li>▪ Carl Weiss, LMSB Director Field Operations (Acting)</li> <li>▪ Maria Stabile, LMSB Industry Counsel</li> <li>▪ Tim Taggart, LMSB Technical Advisor</li> <li>▪ <b>B. John Williams, Shearman &amp; Sterling</b></li> <li>▪ <b>TEI Moderator Alan Getz</b></li> </ul>
	C	<p><b>LIFE INSURANCE</b> LMSB actuaries and technical advisors will discuss life insurance issues such as the expanded program and software.</p> <ul style="list-style-type: none"> <li>▪ <b>Alan Booth, LMSB Actuary</b></li> <li>▪ <b>Ron Hathaway, LMSB Insurance Program Manager</b></li> <li>▪ <b>John Prisco, LMSB Technical Advisor</b></li> <li>▪ <b>Diane Helfgott, LMSB Industry Counsel</b></li> <li>▪ <b>TEI Moderator Robert Levy</b></li> </ul>
2:45– 3:00	<b>Break</b>	
3:00 -	D	<p><b>INFORMATION REPORTING AND WITHHOLDING</b> Discussion topics include bank deposit interest, 1099 cap reporting, audits of withholding agents, and the Qualified Intermediary Program.</p> <ul style="list-style-type: none"> <li>▪ Thomas Chillemi, LMSB Manager (QI)</li> <li>▪ Anthony Inzerillo, QI</li> <li>▪ Martinsburg Computing Center representative</li> <li>▪ IRPAC member</li> <li>▪ <b>John Sweeney, LMSB Counsel</b></li> <li>▪ <b>TEI Moderator Paul Heller</b></li> </ul>

**BREAKOUT  
SESSIONS**

E	<b>BANKING ISSUES</b> General guidance with examples. <ul style="list-style-type: none"> <li>▪ <b>Mary Grady or Jody Botsford, LMSB Technical Advisors</b></li> <li>▪ <b>Vince Guiliano, LMSB Industry Counsel</b></li> <li>▪ <b>Paul Claytor, LMSB Senior Industry Advisor</b></li> <li>▪ <b>Dick Harvey (PricewaterhouseCoopers)</b></li> <li>▪ <b>TEI Moderator Les Honig</b></li> </ul>
F	<b>REGULATORY REPORT: BOOK / TAX REPORTING &amp; ENFORCEMENT IN THE POST-ENRON ENVIRONMENT</b> Panelists representing federal and state regulatory agencies and IRS' Criminal Investigation Division will talk about regulatory issues. <ul style="list-style-type: none"> <li>▪ IRS Criminal Investigation Panelist</li> <li>▪ SEC Panelist</li> <li>▪ NYS Division Taxation Panelist</li> <li>▪ <b>Joseph Reali, Senior VP &amp; Tax Director, Metlife</b></li> <li>▪ <b>TEI Moderator Ben Chapman</b></li> </ul>
4:15 - 5:15 <b>Reception: Cocktails and hors d'oeuvres</b>	

<b>TUESDAY, SEPTEMBER 23</b>	
8:30 – 9: 15 <b>Continental Breakfast</b>	

**BREAKOUT SESSIONS**

9:15 – 10:30	G	<b>CAPTIVE AND PROPERTY &amp; CASUALTY INSURANCE</b> <ul style="list-style-type: none"> <li>▪ <b>Fred Morril, LMSB Technical Advisor</b></li> <li>▪ <b>Emily Hale, LMSB Technical Advisor</b></li> <li>▪ Mark Smith, IRS Chief Counsel</li> <li>▪ <b>Joseph Long, LMSB Industry Counsel</b></li> <li>▪ <b>TEI Moderator Alan Todryk</b></li> </ul>
	H	<b>INTERNATIONAL TAXATION</b> <ul style="list-style-type: none"> <li>▪ <b>Michael J. Sweeney, LMSB PFTG Manager</b></li> <li>▪ Ken Christman, IRS Chief Counsel</li> <li>▪ Non-IRS Panelist</li> <li>▪ <b>TEI Moderator Alan Getz</b></li> </ul>

**BREAKOUT  
SESSIONS**

	I	<p><b>LIMITED ISSUE FOCUSED EXAMINATION</b> It's LIFE or death for some examinations.</p> <ul style="list-style-type: none"> <li>▪ <b>Jody Botsford , LMSB Technical Advisor</b></li> <li>▪ <b>Paul Claytor, LMSB Senior Industry Advisor</b></li> <li>▪ Non-IRS Panelist</li> <li>▪ LMSB Case Manager</li> <li>▪ <b>TEI Moderator Barry Agranoff</b></li> </ul>
10:30 – 10:45	Break	

10:45 – 12:00	J	<p><b>MARK TO MARKET</b></p> <ul style="list-style-type: none"> <li>▪ <b>Paul Claytor, LMSB Senior Industry Advisor</b></li> <li>▪ <b>Suzanne Boule, LMSB Technical Advisor</b></li> <li>▪ <b>Ted Leighton, LMSB Industry Counsel</b></li> <li>▪ John Rodgers, IRS Chief Counsel</li> <li>▪ Lon Smith, Associate Chief Counsel, Financial Institutions and Products</li> <li>▪ <b>TEI Moderator Jeff Karp</b></li> </ul>
	K	<p><b>CAPITALIZATION</b></p> <ul style="list-style-type: none"> <li>▪ <b>Sharon Russell, LMSB Technical Advisor</b></li> <li>▪ Andrew Keyso, IRS Chief Counsel</li> <li>▪ <b>Mary Grady, LMSB Technical Advisor</b></li> <li>▪ <b>TEI Moderator Steve Rogozinski</b></li> </ul>
	L	<p><b>GLOBAL DEALING AND TRANSFER PRICING</b></p> <ul style="list-style-type: none"> <li>▪ <b>Shelley Mitchell, LMSB Technical Advisor</b></li> <li>▪ Paul Epstein, IRS Chief Counsel</li> <li>▪ LMSB Industry Counsel representative</li> <li>▪ <b>TEI Moderator Charles Cino</b></li> </ul>
12:00 – 1:30	<p><b>LUNCH</b> <b>Speaker: Gregory F. Jenner, Deputy Assistant Secretary (Tax Policy)</b> <b>U.S. Treasury Department (confirmed)</b></p>	