

# Committee of Banking Institutions on Taxation

ESTABLISHED 1918

The Committee consists of National and State Banks, Trust Companies, Private Banking Institutions and Institutional Banks. The members of its executive committee and its officers are selected from representatives of these institutions. Its objectives are (a) to cooperate in assisting in the administration of tax laws; (b) to disseminate among its members information pertaining thereto; and (c) to act as a clearing house for communications to or instructions from Federal and State tax Authorities.

Adam S. Rosenberg, Chairman  
John J. Gallagher, Vice-Chairman  
James R. Housman, Secretary  
Michael Swiader, Treasurer

Federal ID # 13-6162067  
Tax Exempt

Website: [www.cbit-usa.org](http://www.cbit-usa.org)

Address all communications to:

Mr. Adam S. Rosenberg  
Lehman Brothers Trust Company, NA  
919 Market Street, Suite 506  
Wilmington, DE 19801  
Tel: (302) 830-4352  
Fax: (646) 885-9438

***40<sup>th</sup> Annual Fall Tax Day  
Credit Suisse Securities (USA) LLC  
1 Madison Avenue  
New York, NY 10010***

***November 5, 2009***

**CORPORATE AGENDA**

<b><u>Time</u></b>	<b><u>Topic</u></b>	<b><u>Speakers</u></b>
<b>8:00 – 8:55</b>	<b>Registration – Sponsors - Coffee</b>	
<b>8:55 – 9:00</b>	<b>Opening Remarks</b>	<b>John J. Gallagher</b> <i>Vice-Chairman, CBIT</i> <b>Ariel X. Assa</b> <i>Corporate Chairman, CBIT</i>
<b>9:00 – 10:15</b>	<b>“The Empire Strikes Back”, a discussion of Treasury/IRS positions on various non-shelter transactions</b>	<b>Bruce Kayle</b> <i>Milbank, Tweed, Hadley &amp; McCloy LLP</i>
<b>10:15 – 10:30</b>	<b>Morning Break</b>	<b>Sponsor Room</b>
<b>10:30 – 12:00</b>	<b>- New York Corporate Tax Reform, - SALT Developments Affecting the Financial Services Industry - California Tax Developments</b>	<b>James Wetzler</b> <b>Karen Boucher</b> <b>Valerie Dickerson</b> <i>Deloitte</i>

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**12:00 – 2:00\***

## **Lunch**

*Keynote Speaker*  
“Outlook for Federal Tax and Budget  
Policy-Frightening Waters Ahead”

*Kenneth J. Kies*  
*Federal Policy Group – Managing  
Director*

## **The John Rozsa Memorial Scholarship Award**

*Scholarship Recipient*  
*Representing Fordham University*

*Prof. Allen Shiff*

*Scholarship Recipient*  
*Representing Pace University*

*Prof. Walter G. Antognini*

**2:00 – 3:15**

- *Recent Developments in the Tax  
Treatment of Debt instruments,*
- *Innovative Tier I Capital Products,*
- *Debt for Debt Exchanges and COD  
Income*

*Yoram Keinan*  
*Mark Leeds*  
*Greenberg Traurig LLP*

**3:15 – 3:30**

## **Afternoon Break**

## **Sponsor Room**

**3:30 – 5:00**

- Transfer Pricing (TP):*
- *Liquidity Issues*
  - *Overlap/Conflict between  
Regulatory & TP Requirements*
  - *TP Implications from Obama  
Legislative Proposals*
  - *TP in a Down Economy*
  - *Application of OECD Attribution of  
Profits to PEs*

*Barbara Mace*  
*Robert Ackerman*  
*Chris Faiferlick*  
*Mary Margiotta*  
*Sayantani Ghose*  
*Ernst & Young LLP*

**5:00 – 7:00**

## **Cocktail Reception**

***\*Joint Session for Corporate & Fiduciary; after the Lunch Break,  
please return to your respective agendas.***