

# CBIT Education Inc.

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.

John Gallagher, Chairman  
Andrew Barkin, Vice-Chairman  
June Goettert, Secretary  
Ariel Assa, Treasurer

Federal ID # 80-0574679  
Tax Exempt  
Website: [www.cbit-usa.org](http://www.cbit-usa.org)

Address all communications to:  
Mr. John J. Gallagher  
Unicredit Bank AG, N.Y Branch  
150 East 42nd Street  
New York, NY 10017  
Tel: (212) 672-5448  
Fax: (212) 672-5532

**44<sup>th</sup> Annual Fall Tax Day**  
**Credit Suisse Securities (USA) LLC**  
**1 Madison Avenue (23<sup>rd</sup> Street & Madison Ave.)**  
**New York, NY**  
**November 21, 2013**

## **CORPORATE AGENDA**

<b><u>Time</u></b>	<b><u>Topic</u></b>	<b><u>Speakers</u></b>
8:00 – 8:55	Registration – Sponsors – Coffee	James R Housman <b>Chairman, CBIT</b> Andrew Barkin <b>Vice Chairman, CBIT</b> Gareth Redenbach <b>Corporate Chairman, CBIT</b>
9:00 – 10:45	FATCA Session	Denise Hintzke <b>Deloitte</b>
	IGAs vs. FATCA: Implementation issues, with a focus on the UK regulations and guidance notes – Denise Hintzke	Danielle Nishida <b>KPMG</b>
	OECD FATCA: An update on status of global FATCA project – Danielle Nishida	Faye Polayes <b>EY</b>
	New guidance and thorny implementation issues – Faye Polayes	
10:45 – 11:00	<b>Morning Break</b>	
11:00 – 12:00	State & Local Taxes Session	Mark Patterson Robert Szelwach <b>PwC</b>
	Recent major proposed and enacted state tax legislation including:	

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*New York Tax Reform Commission,  
Market based sourcing enacted in  
Pennsylvania and Massachusetts,  
Texas Margin Tax changes to  
calculation of cost of goods sold.*

*Ron Rabkin  
Macquarie Group*

*Important change and trends in state &  
local income/franchise taxation  
including: Economic Nexus, Allocation  
and Apportionment and related issues.*

*Important sales/use tax issues & trends  
including taxation of cloud computing,  
information services and soft dollar  
transactions.*

12:00 – 2:00\*

**\*Lunch**

*Luncheon Speaker  
(Former Deputy Chief of Staff & Policy  
Director-Sen. Mitch McConnell)*

*Rohit Kumar  
PWC*

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

*Scholarship Recipient  
Representing Fordham University*

*Prof. Matthew J. Brodie*

*Scholarship Recipient  
Representing Pace University*

*Prof. Walter G. Antognini*

2:00 – 3:30

***BEPS & Transfer Pricing Session***

*Audit Activity on Funds Transfer  
Pricing and Interaction of Regulatory  
Change & Transfer Pricing Compliance  
– Chris Faiferlick*

*Chris Faiferlick  
EY*

*Global BEPS Fallout - PwC*

*Phillip Fried  
Mike Gaffney  
Adam Katz  
Kathryn O'Brien  
PwC*

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***Chris Faiferlick  
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***Audit Activity on Funds Transfer  
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***Phillip Fried  
Mike Gaffney  
Adam Katz  
Kathryn O'Brien  
PwC***

***Global BEPS Fallout - PwC***

***BEPS Documentation Issues – Kathryn  
O'Brien.***

***Other Specific Action Items in BEPs –  
Interest, PEs, IP, Group Synergies,  
Risks and Capital.***

**3:30 – 3:45**

***Afternoon Break***

**3:45 – 5:00**

***Tax Controversy Session***

***Neil Bernstein  
Bank of Tokyo-Mitsubishi***