

# 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.

Adam S Rosenberg, Chairman  
James R Housman, Vice-Chairman  
Michael Swiader, Secretary  
June Goettert, 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

***43rd Annual Fall Tax Day  
Credit Suisse Securities (USA) LLC  
1 Madison Avenue  
New York, NY 10017  
November 15, 2012***

## **CORPORATE AGENDA**

<b><u>Time</u></b>	<b><u>Topic</u></b>	<b><u>Speakers</u></b>
8:00 – 8:55	Registration – Sponsors - Coffee	
8:55 – 9:00	Opening Remarks	John J. Gallagher Chairman, CBIT Ariel Assa Corporate Chairman, CBIT
9:00 – 10:15	Tri-State Update Legislative, Policy & Audit initiatives	Judith Garner Karen Ryan Michelle Zahler
	Multistate Update	<b>Ernst &amp; Young</b>
	- Key Legis. Developments	Craig Wechman
	- Audit Issues	<b>Deutsche Bank</b>
	- Developments from the MTC	
	Credits & Incentives-Consideration for Fin. Svcs. Co's. in the various states	
10:15 – 10:30	Morning Break	Sponsor Room

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10:30 – 12:00

## *International Tax Legislative & Administrative Update*

- *Key Legislative developments*
- *Tax Reform and Possible shifting to a Territorial Tax system*
- *Notice 2012-39: The Latest Anti-Repatriation Guidance*
- *Section 901(l): FTC disallowance*
- *FATCA: Update on Regs. and IGA's*
- *Section 956 & Cleared Swaps*
- *Section 871(m) Regulations and Announcement*

*Michael Caballero*  
***Covington & Burling (Until recently, International Tax Counsel, U.S. Treasury)***

*Carla Pehowski*  
***Royal Bank of Canada***

12:00 – 2:00\*

## **\*Lunch**

*Luncheon Speaker*

*Benjamin Pace*  
***(US Chief Investment Officer/Head Global Investment Solutions-Americas)***  
***Deutsche Bank***

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

*Scholarship Recipient*  
*Representing Fordham University*

*Prof. Allen Shiff*

*Scholarship Recipient*  
*Representing Pace University*

*Prof. Walter G. Antognini*

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2:00 – 3:15

*Recent Tax Development Affecting  
Debt-for-Debt Exchanges,  
Amendments, Qualified Re-openings,  
and Similar Transactions*

*Robert Holo  
Simpson Thacher  
Andrew Chalnicks  
JP Morgan Chase*

3:15 – 3:30

*Afternoon Break*

*Sponsor Room*

3:30 – 5:00

*Recent Tax developments (Including  
Economic Substance & Debt vs.  
Equity) and Year-end Tax Planning*

- *Recent tax developments:  
Economic Substance cases and  
Debt/Equity cases.*
- *Year-end Tax  
Planning/Concerns: Expiring  
tax provisions/extenders and  
post-election expectations.*

*Yoram Keinan  
Greenberg Traurig  
Tony Tuhs  
Deutsch Bank  
Neil Bernstein  
Bank of Tokyo-Mitsubishi*

5:00-7:00

*Cocktail Reception*

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