

# 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.

John J. Gallagher, Chairman  
James R. Housman, Vice-Chairman  
Michael Swiader, Secretary  
June A. Goettert, Treasurer

Federal ID # 13-6162067  
Tax Exempt

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

Address all communications to:

Mr. John J. Gallagher  
UniCredit Bank AG, New York Branch  
150 East 42<sup>ND</sup> Street  
New York, NY 10017  
Tel: (212) 672-5448  
Fax: (212) 672-5532

## CBIT – 28<sup>th</sup> Annual Spring Tax Day Credit Suisse 11 Madison Ave., New York, NY June 25<sup>th</sup>, 2013

### Corporate Agenda

- |                 |  |  |
|-----------------|--|--|
| 12:30 – 1:00 PM | <i>Registration</i>  |  |
| 1:00 – 1:05 PM  | <i>Welcome &amp; Opening Remarks</i>   | <b>Andrew Barkin</b><br>Vice Chairman, CBIT<br><b>Ariel Assa</b><br>Corporate Chairman, CBIT   |
| 1:05 – 2:05 PM  | <i>Financial Instrument Tax Reform</i>   | <b>Michael Farber</b><br>Davis Polk<br><b>Allen Friedman</b><br>JPMorgan Chase<br><b>David Hariton</b><br>Sullivan & Cromwell<br><b>Marko Kolanovic</b><br>JP Morgan Chase                               |
| 2:05 – 3:05 PM  | <i>The STARS Transaction Decision and Other Recent Applications of the Economic Substance Doctrine on the Banking Industry</i> | <b>Yoram Keinan</b><br>Greenberg Traurig LLP<br><b>Stow Lovejoy</b><br>Kostelanetz & Fink LLP<br><b>Anthony Tuths</b><br>WithumSmith + Brown PC<br><b>Neil Bernstein</b><br>Bank of Tokyo-Mitsubishi UFJ |

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3:05 – 3:15 PM      Afternoon Break

3:15 – 4:10 PM

*State and Local Developments:*

- *Customer or market based sourcing of sales/receipts related to loans and other financial transactions*
- *Classification of non-banks as financial institutions/banks and bank subsidiaries as non-banks on Economic nexus.*      **Karen Boucher**  
Deloitte  
**Ron Rabkin**  
Macquarie

4:10 – 5:00 PM

- *FATCA Update: Practical Considerations*
- *FTT Developments*

**Michelle Lee**  
PricewaterhouseCoopers  
**Carla Pehowski**  
Royal Bank of Canada

5:00 – 7:00 PM      Cocktail Reception