



Hyatt Regency Hotel, Dallas, TX
{Oct. 18-21, 2015}

**CORRALLING COMPLEX
TAX OPPORTUNITIES**



 **TAX EXECUTIVES INSTITUTE, INC.**

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www.tei.org

Preliminary Program

 **TAX EXECUTIVES INSTITUTE, INC.**



CALENDAR OF EVENTS

2016

- | | |
|---------------|---|
| March 13-16 | 66th Midyear Conference
Grand Hyatt Washington Hotel –
Washington, DC |
| April 25-29 | Federal Tax Course – Level I
Kellogg Conference Center
Michigan State University –
East Lansing, MI |
| August 15-19 | U.S. International Tax Course
Georgia Tech Conference Center –
Atlanta, GA |
| October 16-19 | 71st Annual Conference
Marriott Downtown –
Philadelphia, PA |

GENERAL INFORMATION

NEW AND NOTEWORTHY

While many features of our conference will be familiar to you, there are several new and noteworthy items at this year's Annual Conference, including:

- New session for emerging professionals, held Monday afternoon – join us for speed networking and more!
- Team discounts for companies bringing three or more people (see below for specifics)
- WiFi available throughout all meeting rooms
- Committee meetings on Sunday are open to all members
- An extended reception on Tuesday night – a more casual social event replacing the banquet
- **AC15.tei.org** – your online home for current program / speaker info, planning your visit to Dallas, and general conference details

ELIGIBILITY TO ATTEND

Registration is open to members of TEI and other in-house tax professionals. (Individuals engaged in private law, accounting, or other consulting practice are ineligible to attend.) TEI is offering an early registration discount to members and nonmembers whose registrations and payments **are received by** TEI by 4:00 p.m. ET on September 21, 2015.

REGISTRATION FEES (IN U.S. DOLLARS)

TEI Member by 9/21.....	\$ 850
TEI Member after 9/21.....	\$ 900
First-Timer (Members Only) by 9/21.....	\$ 650
First-Timer (Members Only) after 9/21.....	\$ 700
Nonmember by 9/21	\$1,050
Nonmember after 9/21.....	\$1,100
Associate Member/Member in Transition.....	\$ 500
Spouse.....	\$ 200

Team Discount

As a special incentive for companies to send multiple attendees, a \$200 discount will apply for the third (and all subsequent) registrants from your company*. During the registration process, enter "TEAM15" into the box labeled "Discount Code." The \$200 discount will be applied before checkout.

**First-timer and group discounts may not be combined. All participants in the group discount must be registered at the full member or non-member rates.*

GENERAL INFORMATION

FIRST-TIME REGISTRANTS

TEI has reduced the registration fee by \$200 for members who are attending their first TEI conference (Annual or Midyear). If you are a member attending your first conference, please check the appropriate box on the registration form and submit your payment of \$650 by September 21, 2015, or \$700 after that date. (This offer applies only to TEI members and pending members.)

MEMBERS IN TRANSITION

TEI has lowered the conference fee for members in transition. Unemployed individuals who are members in good standing may register for the conference by paying only \$500. Members wishing to take advantage of the reduced fee should mark the appropriate box on the registration form. They will be contacted to affirm both their desire to obtain a full-time position in industry and that they are not holding non-qualifying employment such as with a law or accounting firm, as well as their adherence to TEI's policy of non-solicitation.

FINANCIAL AID FOR ILLINOIS LICENSED ATTORNEYS

Scholarships to defray tuition expense for this program are available for in-house tax professionals (both TEI members and nonmembers) who are temporarily unemployed and who are Illinois licensed attorneys with a demonstrated financial hardship. Scholarships will be reviewed and provided upon application on a case-by-case basis. Attorneys who qualify will receive at least a 50% reduction in the conference fee (which does not include any reduction or reimbursement for meals, lodging, or travel costs associated with the conference). To request information on whether you might qualify, please contact us at meetings@tei.org.

REGISTRATION PROCEDURE

Please register online at AC15.tei.org or send the completed registration form to TEI with your registration fee. Checks should be made payable to Tax Executives Institute, Inc. All payments must be in U.S. dollars. A registration form will not be processed unless accompanied by payment, and **no registrations will be accepted over the phone**. Because of TEI's lock-box procedures, registrations should not be sent to TEI's street address.

By WEB: Go to AC15.tei.org. Click on "Register."

By Mail and USPS Express Mail: Send registration form with check or credit card information. Mailing address for registrations: TEI, P.O. Box 9407, Uniondale, NY 11555-9407.

By Other Express Mail: Citi @ 1 Reckson Plaza, Wholesale Lockbox Lower Level, Attn.: J. Brady/N. Richards, Uniondale, NY 11555. Mark inside envelope "P.O. Box 9407-Tax Executives Institute."

GENERAL INFORMATION

By Fax: 202.638.5607. Credit card registrants only. VISA, MasterCard, American Express, Diners Club, and Discover only. To ensure confidentiality, please fax between 9 am and 4 pm ET.

Fee covers the reception on Sunday, October 18; continental breakfast and luncheon on Monday, October 19; continental breakfast, luncheon, and reception on Tuesday, October 20; continental breakfast and box lunch on Wednesday, October 21; refreshment breaks; and all conference materials. After your registration has been processed, you will receive a confirmation via email within two business days. (If you don't see it in your inbox, check your spam filter or call 202.638.5601.)

HOTEL INFORMATION

TEI's 70th Annual Conference will be held at the Hyatt Regency Dallas, in Dallas, Texas. A block of rooms is being held for conference registrants, who are responsible for making their own hotel reservations. There is a link on AC15.tei.org to book your rooms. Reservations may only be made by using this link; telephone reservations will not be accepted. A one-night charge will be made to your credit card to secure your reservation.

The room rates are \$215 single, \$235 double occupancy. All rates are subject to prevailing taxes. The TEI block of rooms will be released for sale to the public on September 25, 2015. Requests for accommodations after that date, or sooner if the block sells out, cannot be guaranteed. Registrants are urged to make their reservation as soon as possible.

The Hyatt Regency's address is: 300 Reunion Blvd, Dallas, TX 75207. Phone: 214.651.1234. General information on the hotel may be found at www.dallasregency.hyatt.com.

Travel to the Hyatt Regency, Dallas:

The hotel is conveniently located 22 miles from the Dallas Fort Worth International Airport (DFW).

Options for getting to and from the hotel include:

Taxi - Fares range from \$45 to \$50 one way.

Super Shuttle - Fares are approximately \$17 per person, one way or \$34 round trip.

Love Field Airport (DAL) is located 8 miles from the hotel.

Taxi - Fares range from \$25 to \$25 one way.

Parking Information

If you plan on renting a car, parking at the Hyatt Dallas is \$26 per day for valet parking and self parking is available.

GENERAL INFORMATION

CANCELLATION AND SUBSTITUTION POLICY

Refunds will be made for cancellations received in writing by 4:00 pm ET on September 25, 2015, and will be subject to an administrative service charge of \$75 (U.S.); for cancellations between September 25 (the date the handout materials become available) and before October 5, the charge will be \$200. No refunds will be made for cancellations received after that date or for no-shows. Refund of credit card registrations less the administrative charge will be made to the credit card account. In the event of cancellation of the conference, TEI's liability is limited to the return of the registration fee. Members unable to attend may purchase the conference materials for \$200 (U.S.). There will be a \$50 charge for substitutions (plus any fee differential). Your hotel reservation must be cancelled separately.

CONFERENCE PARTICIPATION

You must register for the entire conference to attend any educational session or take part in any conference activity, including keynote addresses. Admission to luncheons and receptions will be by ticket only. Conference name badges will be required for admission to all educational sessions. No partial or split registration will be permitted.

Registrants are encouraged to visit exhibits hosted by TEI's conference sponsors, whose financial support enables the Institute to pursue its educational, networking, and advocacy goals without raising program fees or dues. Registrants should know that by entering drawings held by the sponsors, they are consenting to being contacted by the firms. In addition, TEI grants a one-time license to conference sponsors to contact registrants following the conference. Registrants wishing to have their names removed from the list provided to sponsors should write the word "remove" on the back of their business card and drop it off at the TEI Registration Desk. Questions about TEI's sponsorship program should be directed to asktei@tei.org. Sponsors are not permitted to attend any educational sessions.

SPOUSES

The spouse fee covers the reception on Sunday, the reception on Tuesday, and a box lunch on Wednesday.

CONFERENCE ATTIRE

Business casual attire may be worn at all conference functions.

MEAL TICKETS

Registrants may purchase tickets for guests to luncheons and receptions at the TEI Registration Desk. Guest tickets may not be purchased for sponsors or practitioners.

GENERAL INFORMATION

SMOKING POLICY

Smoking is not permitted during any TEI conference event.

CONFERENCE HANDOUT MATERIALS

Conference materials will be posted in a searchable format on a secure website. Beginning two weeks before the conference, registrants will be able to access the handouts via a secure link (requiring a password), so they can download or print them out. **No paper copies will be provided in your registration materials, and onsite printing facilities will be extremely limited.** TEI encourages you to download or print documents of interest in advance or bring your laptop/tablet and access the handouts on demand. Materials will remain accessible by conference registrants for one month after the conference.

CONFERENCE MOBILE APP

To enhance your Annual Conference experience, TEI has designed and launched a mobile application for smartphones and tablets. To download the mobile app, just point your device's web browser to **ac.tei.org**. Once installed, you'll be able to access session schedules and handouts, maps, as well as information on speakers, sponsors, and more. **Remember:** You'll need internet access to use the app – but if you save the application to your home screen, you will be able to download and access the information offline.

MEDIA & MESSAGES

Sessions involving government officials will be open to the media. Telephone calls, messages, and conference announcements will be posted on the message board at the TEI Registration Desk. The phone number for messages is 214.651.1234 (ask for the TEI Registration Desk). Hotel guests may receive fax messages at 214.742.8126.

RECORDING DEVICES & MOBILE PHONES

The use of digital and other recording devices is not permitted in any meeting rooms, except by accredited members of the media. To avoid disturbing others, please switch off mobile phones upon entering the meeting rooms.

TRACK DESIGNATIONS

Educational tracks are identified throughout the program as follows:

Chief Tax Officer (CTO) **CTO**

Federal (F) **F**

General (GEN) **GEN**

International (INTL) **INTL**

State & Local (S&L) **SALT**

GENERAL INFORMATION

CPE CREDIT INFORMATION

Tax Executives Institute is registered with the National Association of State Boards of Accountancy as a sponsor of “group live” continuing professional education on the National Registry of CPE Sponsors (registry number 103086). State boards of accountancy have final authority on the acceptance of individual courses. Complaints regarding sponsors may be addressed to National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN 37219-2417. Website: www.nasba.org. For more information regarding administrative policies such as complaint and refund, call TEI at 202.638.5601.



Date: Annual Conference, October 18-21, 2015

Delivery Method: Group Live

Program Level: Overview

Field of Study: Taxes

Learning Objectives: To provide updates on legislative, regulatory, and judicial developments relating to federal, state & local, international, and Canadian taxation, as well as to analyze the effect of financial reporting developments on effective operation for corporate tax departments.

Prerequisite: None.

Advanced Preparation: No advance preparation required.

CPE Credit: 16.5 maximum hours

CLE Credit: 13.5 maximum hours

Financial Accounting Credits: **A**

TEI's 70th Annual Conference is co-sponsored by TEI Education Fund, a qualified section 501(c)(3) organization.

Tax Executives Institute and TEI Education Fund accord to participants of any race, color, creed, sex, or national ethnic origin all the rights, privileges, programs, and activities generally accorded or made available to participants at its programs, courses, and other activities.

CPE/CLE requirements vary from jurisdiction to jurisdiction. TEI's education programs are designed to meet NASBA standards, and are generally accepted by CPE/CLE agencies across the United States. Registrants should check the rules in their own jurisdictions to ensure eligibility.

CONFERENCE PROGRAM

The conference program is subject to change. Please check ac15.tei.org for the most up-to-date schedule of events.

INDUSTRY & SUBJECT MATTER SESSIONS

MONDAY, OCTOBER 19 | 2:45 PM

Evaluations show that moderated sessions are more beneficial to the group. If you would like to find out more about being an industry session moderator, or to volunteer, please contact meetings@tei.org.

INDUSTRY SESSIONS

Aerospace & Government Contracting

Automotive Suppliers/Machinery & Allied Products

Chemicals

Electronics

Financial Institutions

Food & Beverage

Forest Products

Health Care

Insurance

Media

Mining

Petroleum

Pharmaceuticals

Primary Metals & Other Basic Manufacturing

Restaurant, Hotel & Franchise Operations

Retail Trade

Telecommunications

Transportation

Utilities

All Others – Manufacturing

All Others – Non-Manufacturing

SUBJECT MATTER ROUNDTABLES

State & Local Tax

International Tax

CONFERENCE SPONSORS

Tax Executives Institute acknowledges the support of the following sponsors of the 70th Annual Conference (as of 8/20/15)

PLATINUM

Thomson Reuters
(TEI's Exclusive Affinity Partner)

ADP

Alvarez & Marsal Taxand, LLC

Andersen Tax

Baker & McKenzie LLP

Bloomberg BNA

Corptax, Inc.

Deloitte Tax LLP

DLA Piper US LLP

Ernst & Young LLP

Grant Thornton LLP

KPMG LLP

Mayer Brown LLP

PricewaterhouseCoopers LLP

Sutherland Asbill & Brennan LLP

Vertex, Inc.

CONFERENCE SPONSORS

GOLD

CTI, LLP

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Step Up For Students

BRONZE

Alston & Bird LLP

Miller & Chevalier Chartered

Osler, Hoskin & Harcourt LLP

Pepper Hamilton LLP

Thompson & Knight LLP

Vinson & Elkins LLP

SUNDAY, OCTOBER 18

9:00 – 11:30 am **Executive Committee Meeting**

11:30 am – 1:00 pm **Executive Committee, Committee Chairs & Past Presidents Luncheon**

Noon – 8:00 pm **Registration**

1:00 – 4:00 pm **Board of Directors Meeting**

4:00 – 6:00 pm **Committee Meetings**

- **Corporate Tax Management**
- **Federal Tax**
- **Financial Reporting**
- **IRS Administrative Affairs**
- **State & Local Tax**
- **U.S. International Tax**

6:30 – 7:30 pm **Welcome Reception**

(All sessions before 4:00 pm are by invitation only)

MONDAY, OCTOBER 19

7:00 am – 5:00 pm **Registration**

7:00 – 8:15 am **Continental Breakfast**

7:00 – 7:45 am **Chapter President's Roundtable** (*Invitation Only*)

8:00 – 8:15 am **Welcome and President's Address**

Remarks by: C.N. (Sandy) Macfarlane
Chevron Corporation
TEI International President

8:15 – 9:45 am **FIRESIDE CHAT**

The State of Tax Administration – Present & Future

Bryon Christensen, Moderator
Amazon.com

Julia Kazaks, Moderator
Activision Blizzard

Heather Maloy (*Invited*)
Former Commissioner, LB&I, Internal Revenue Service
Leader, Tax Controversy & Risk Management Services
Ernst & Young LLP

9:45 – 10:00 am **Refreshment Break**

10:00 – 11:15 am **Cross Border Transactions – Soup to Nuts**

INTL

Greg Palmer
Todd Welty
Lowell Yoder
McDermott, Will & Emery LLP

10:00 – 11:15 am **Working with State Departments of Revenue: The Do's and Don'ts**

SALT

Jamie Fenwick, Moderator
Time Warner Cable
Chair, TEI's State & Local Tax Committee

Michael Bryan
Deloitte Tax LLP

Harley Duncan
KMPG LLP

Joe Huddleston
Ernst & Young LLP

10:00 – 11:15 am **Research & Experimentation Credits: Practical Approaches to Planning & Defense**

INTL

Sandhya Edupuganty, Moderator
Texas Instruments Incorporated

Kathleen King
Alvarez & Marsal Taxand, LLC

Jeffrey Malo
Andersen Tax

11:15 – 11:30 am **Refreshment Break**

11:30 am – 12:45 pm **The New Revenue Recognition Rules and Their Impact on Methods of Accounting**

GEN

Leslie P. Schneider
Ivins, Phillips & Barker

11:30 am – 12:45 pm **Innovation Boxes Around the World**

INTL

Agnieszka (Ag) Samoc, Moderator
Danaher Corporation

11:30 am – 12:45 pm **Best Practices in Benefits Tax Planning**

F

David Sherwood, Moderator
Microsoft Corporation

Brian Cumberland
Alvarez & Marsal Taxand

Shane Tucker
Vinson & Elkins LLP

12:45 – 2:45 pm **Luncheon & Awards Presentation**

Presentation: C.N. (Sandy) Macfarlane
Chevron Corporation
TEI International President

Remarks by: Pascal Saint-Amans (Invited)
Director, OECD Centre for Tax Policy and Administration

2:45 – 4:15 pm **Industry and Subject Matter Sessions/ Roundtables** (see page 7 for listings)

4:15 – 4:30 pm **Refreshment Break**

- 4:30 – 5:30 pm **Emerging Tax Professional Session**
- 4:30 – 5:30 pm **CAP Subcommittee** (*Open to all members*)
- 5:15 – 6:15 pm **First Timer and New Member Reception**

TUESDAY, OCTOBER 20

TUESDAY

- 7:00 am – 5:00 pm **Registration**
- 7:00 – 8:00 am **CTO Breakfast** (*Invitation Only*)
- 7:00 – 8:00 am **Continental Breakfast**
- 8:15 – 9:00 am **Keynote Address**
 Robert Stack
*Deputy Assistant Secretary
 (International Tax Affairs)
 U.S. Department of the Treasury*
- 9:00 – 10:30 am **FIRESIDE CHAT**
A Discussion with the Chief Financial Officer: Needs and Expectations of the Tax Department
 Louis Mestier, Moderator
*Hanger, Inc.
 Chair, Corporate Tax Management Committee*
 Douglas Aron
*Executive Vice President &
 Chief Financial Officer
 HollyFrontier*
 Daniel J. Cancelmi
*Chief Financial Officer
 Tenet Healthcare*
 Biggs S. Porter
*Executive Vice President &
 Chief Financial Officer
 Fluor Corporation*
- 10:30 – 10:45 am **Refreshment Break**
- 10:45 am – Noon **Indirect Tax Trends in Digital World**
SALT
 Marji Gordon-Brown, Moderator
MacAndrews & Forbes Incorporated
 Charles Kearns
Sutherland Asbill & Brennan LLP
 Joel Waterfield
Grant Thornton LLP

10:45 am – Noon **BEPS – Where Have We Been and Where Are We Headed?**

INTL

Mark Pollard, Moderator
Kimberly-Clark Corporation
 Chair, TEI U.S. International Tax Committee

Henry Birnkrant
 Sam Kaywood, Jr.
Alston & Bird LLP

10:45 am – Noon **Return on Investment and the Tax Function: Metrics Matter**

F CTO

Evan Ernest, Moderator
Toll Brothers

Karen Bowles
PricewaterhouseCoopers LLP

Randy Robason
Grant Thornton LLP

Mark Schutzman
Ernst & Young LLP

Noon – 12:15 pm **Refreshment Break**

12:15 – 1:15 pm **FASB Exposure Draft Update & Expected Outcomes**

GEN

12:15 – 1:15 pm **Staying Out of Trouble: Effective Due Diligence for State Taxes During M&A Review Process**

SALT

Cathy Stevens, Moderator
Brunswick Corporation

Ray Freda
 Jim Tauber
Andersen Tax

12:15 – 1:15 pm **Treasury Centers and Intercompany Financial Transactions: International Issues**

INTL

Mark Pollard, Moderator
Kimberly-Clark Corporation
 Chair, TEI U.S. International Tax Committee

Kristen Hazel
 Andrea Kramer
McDermott Will & Emery LLP

1:30 – 2:45 pm **Luncheon**

Remarks by: Glenn Hegar
Texas State Comptroller of Public Accounts

3:00 – 4:00 pm **Surviving an Employee Benefits Audit Examination**

F

Colleen Brown, Moderator
Barrick Gold
Chair, IRS Administrative Affairs Committee

Eddie Adkins
Grant Thornton LLP

Anne Batter
Baker & McKenzie LLP

3:00 – 4:00 pm **Managing Your Tax Provision Process**

CTO

Kristine Rogers, Moderator
Love's Travel Stops & Country Stores, Inc.

Gary Colbert
Corptax, Inc.

Brad Hearn
Longview Solutions

Jon Sappey
Vertex, Inc.

3:00 – 4:00 pm **Choice of Jurisdiction for Global Expansion**

INTL

Peter Waterstreet, Moderator
Synopsys, Inc.
Vice Chair, TEI U.S. International Tax Committee

Robin Chesler
Amanda Kottke
Baker & McKenzie LLP

4:00 – 4:15 pm **Refreshment Break**

4:15 – 5:15 pm **The Use of International Partnerships in IP Planning**

INTL

James Crenshaw, Moderator
KBR, Inc.

Daniel Luchsinger
Covington & Burling LLP

4:15 – 5:15 pm **Canadian Tax Planning for U.S. Companies (Canadian Commodity Tax and Income Tax)**

INTL

Edwin Kroft
Blake Cassels & Graydon LLP

4:15 – 5:15 pm **Transfer Pricing for State Tax**

SALT

James Kennedy, Moderator
OppenheimerFunds, Inc.

Bryon Christensen
Amazon.com, Inc.

Jeffrey Friedman
Sutherland Asbill & Brennan LLP

5:15 – 6:15 pm **Tax Reform Task Force** (*Open to all members*)
Ray Beeman (Invited)
Washington Council
Ernst & Young LLP

6:30 – 8:30 pm **Reception**

WEDNESDAY, OCTOBER 21

7:00 – 8:30 am **Thomson Reuters ONESOURCE Advisory Meeting** (*Invitation Only*)

7:00 – 8:30 am **Thomson Reuters Checkpoint Advisory Meeting** (*Invitation Only*)

7:30 am – Noon **Registration**

7:30 – 8:30 am **Continental Breakfast**

8:30 – 9:30 am **What You Need to Know in SALT:
A Legislative, Regulatory and Judicial Update**

SALT

Korwin Roskos, Moderator
Amazon.com, Inc.

Mary Benton
Alston & Bird LLP

Marc Simonetti
Sutherland Asbill & Brennan LLP

8:30 – 9:30 am **BEPS & Technology – How Ready Are You?
(CbyC, Transfer Pricing Master File)**

INTL CTO

Stephen Blough
Kimberly Majure
KPMG LLP

Sam Cicogna
Thomson Reuters

8:30 – 9:30 am **Taxation in the Oil Patch – Partnerships,
Joint Ventures and Other Structures**

F

Mickey Culpepper, Moderator
Baker Hughes

Roger Aksamit
Thompson & Knight LLP

Gary Huffman
Vinson & Elkins LLP

9:30 – 9:45 am **Refreshment Break**

9:45 – 10:45 am **The Role of Judicial Doctrines in
Challenges to International Planning**

F INTL

Matt Lerner
Sidley Austin LLP

Kristen Proschold
Baker & McKenzie LLP

WEDNESDAY

9:45 – 10:45 am **Loss Corporation Planning**

CTO

Steve Matays
Skadden, Arps, Slate, Meagher & Flom LLP

John Sweet
King & Spalding

9:45 – 10:45 am **Defending Partnerships Examinations**

F

Wayne Hamilton, Moderator
Wal-Mart Stores

Deborah Fields
KPMG LLP

Tyler Horton
Alvarez & Marsal Taxand

10:45 – 11:00 am **Refreshment Break**

11:00 am – Noon **LB&I and the Road Ahead**

CTO

Ernest Gates, Moderator
Wal-Mart Stores

David Blair
Crowell & Moring LLP

Jennifer Breen
Morgan, Lewis & Bockius LLP

Rob Morris
Norton Rose Fulbright LLP

11:00 am – Noon **Valuations – Purposes and Uses,
Concepts & Methodologies**

F

Janet Kreilein, Moderator
Foris Management Group LLC

Patrick Kelly
Daniel Peckham
Deloitte Tax LLP

Noon – 1:00 pm **Box Lunch**

Noon – 1:00 pm **Continuing Education Committee Meeting**