

November 17-18, 2016

Marriott Marquis, 1535 Broadway
New York, NY
212.398.1900

The 31st Annual Forum on **Tax Withholding & Information Reporting Conference**

Featured Topics

- U.S. NRA and domestic backup withholding
- FATCA
- The Common Reporting Standard
- Qualified Intermediary and Qualified Derivative Dealer rules
- Section 871(m)

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Optional One-Day Pre-Conference Workshop

Information Return Reporting and Withholding Bootcamp

November 16, 2016 | Marriott Marquis
New York, NY
212.398.1900

Why Choose an EETi Event?

- EETi brings together the recognized industry experts to share their insights and strategies on how to deal with the increasing number of regimes.
- EETi offers a unique forum for government and private sector discussions that allow both sides to better understand the other side's concerns and struggles.
- EETi provides an unparalleled opportunity for those specializing in withholding and reporting to interact with each other and the experts.

PRE-CONFERENCE WORKSHOP

9:00 AM–4:30 PM (TWO FIFTEEN-MINUTE BREAKS, ONE HOUR LUNCH)

INFORMATION RETURN REPORTING AND WITHHOLDING BOOTCAMP— A FOUNDATION AND REFRESHER FOR ALL

This session is a one day intensive primer on the fundamentals of documentation, reporting and withholding rules relating to cross-border payments including Chapter 3 (NRA); Chapter 4 (FATCA); and Chapter 61 (domestic). Withholding agents need to know three different documentation, reporting, and withholding regimes, and how they relate to each other. The task is daunting. It is essential for withholding agents to take action now to avoid significant financial and reputational risks.

Using flowcharts and a case study approach with numerous real life scenarios and applications, we will illustrate the purpose of the rules and make the rules easier to remember and comprehend. Examples of scenarios that will be covered are:

- An individual opens a bank account to collect payments made to his consulting company. What documentation is required, in the absence of valid documentation, and what withholding regime applies? Could FATCA be involved?
- A foreign vendor provides goods, services, and intangible assets to a U.S. client. How are the various payments to be documented and reported? Could withholding apply to some but not all of the payments? Are expense reimbursements subject to reporting and possibly withholding? What would be the implications if an income tax treaty applied? What forms are used for reporting? Are any returns required by the withholding agent? Does FATCA apply? What happens if the vendor opens a bank account in the U.S.?
- A foreign company makes investments underlying owners. Is FATCA implicated? If so, what is the interaction between FATCA and the nonresident alien withholding rules? If no documentation is provided, what are the presumption rules for determining whether FATCA, NRA reporting and withholding or domestic withholding and reporting applies?

Through these and other real life examples participants are exposed to numerous applications and interactions of the various withholding and reporting rules. The bootcamp will provide specific information in clear and comprehensible terms how the multiplicity of withholding and reporting rules will necessitate significant modifications to the current approach to information reporting and tax withholding.

Please join us in this engaging and interactive session and discover real-life solutions to scenarios you'll surely encounter. Walk away with the knowledge, information, and tools you will need to plan with confidence.

ATTEND IF YOU HOLD ONE OF THESE KEY POSITIONS

- Tax Department Personnel
- Operations Department Personnel
- Compliance Professionals
- Internal/External Auditors
- Trust Tax Representatives
- Legal Counsel
- MIS/Systems Professionals
- Thrift Representatives
- CPA Advisors
- Accounts Payable Personnel

COURSE LEADER



CYRUS DAFTARY
IHS Markit | CTI Tax Solutions

FACULTY

PHILIP GARLETT
E&Y

KARAN MOSLEY
Barclays Capital

9:00–9:15 AM: OPENING REMARKS

CHIP K. COLLINS, UBS AG
JOHN STAPLES, E&Y

9:15–10:45 AM | THE IRW YEAR IN REVIEW

Failure to comply with the U.S. domestic backup withholding and reporting regimes can lead to significant penalties and hard to remedy tax exposures. It is crucial to stay up to date with the rules, including the challenging cost basis rules, and this panel will bring you up to date.

DEBBIE PFLIEGER, E&Y
STEVIE CONLON, Wolters Kluwer

10:45–11:00 AM: REFRESHMENT BREAK

11:00 AM–12:00 PM | CONTINUING CASE STUDIES ON DOCUMENTATION CHALLENGES

This panel is a continuation of a popular panel from prior conferences that highlights and discusses documentation issues and how best to address them. Remember that these regimes are all about the documentation and due diligence so it is key to stay on top of these issues and ensure documentation validity – and avoid potential tax exposures!

CHIP K. COLLINS (Moderator), UBS AG
LAURIE HATTEN-BOYD (Panelist), KPMG LLP
DANIELLE NISHIDA (Panelist), KPMG LLP

12:00–1:00 PM: LUNCHEON **LOSCALZO** SPONSORED BY **INSTITUTE**

1:00–2:00 PM | THE EMERGING SECTION 871(M) REGIME

U.S. and non-U.S. financial institutions are trying to figure out how to cope with the section 871(m) regime (let alone the new QDD agreement to be discussed in the next panel). Highly challenging technical issues remain even while the January 1, 2017, effective date remains in place. This panel will cover the key issues and explore practical implementation strategies.

ROBERT J. FOLEY (Moderator), State Street Bank and Trust Company
JULIO JIMENEZ (Panelist), Jimenez Tax Law Firm, PLLC
ELISSA JOHNSON (Panelist), Bank of America

2:00–3:00 PM | THE NEW QDD AGREEMENT

A key part of the IRS's efforts to ensure effective compliance with the section 871(m) rules on dividend equivalent transactions is to expand the QI concept to qualified derivative dealers. In practical terms, many financial institutions that have never dealt with a QI Agreement in the past will need to enter into one to comply. Even for existing QIs, they will find that business lines that have been outside of the QI universe are about to be swept into scope. This panel will explain the new rules and discuss implementation strategies.

ANTHONY MARTIRANO, Deloitte Tax LLP
MARKUS WEBER, Deloitte Tax LLP

3:00–3:15 PM: REFRESHMENT BREAK

3:15–4:15 PM | THE NEW WORLD OF QI COMPLIANCE

Just when you thought that you had a really good handle on the QI external audit process, the IRS totally changed the approach to one that requires certifications of effective internal controls by responsible officers – under penalties of perjury – and the provision of impressive amounts of information to the IRS. To put it mildly, those charged by their institutions with being responsible officers are only going to want to sign such a certification if they have no doubt of its accuracy. This panel will cover how to develop a winning compliance strategy.

JILLIAN NICOLSON (Moderator), E&Y
YVONNE KUNIHIRA-DAVIDSON (Panelist), IHS Markit|CTI Tax Solutions
JULIA MILLS (Panelist)

4:15–5:15 PM | LESSONS LEARNED FROM THE REPORTING SEASON

A key part of the U.S. withholding tax rules, and the focus of FATCA and CRS, is the provision of information to the IRS and the tax authorities of other countries. These tax authorities understandably take a dim view of faulty or incomplete reporting. Withholding agents and practitioners continue to learn valuable lessons from actual reporting efforts and this panel will share those with the audience.

CYRUS DAFTARY (Moderator), IHS Markit|CTI Tax Solutions
CHRISTINA FERKO-DIAZ (Panelist), Vanguard-Global Tax Advisors
DAVID WEISNER (Panelist), Brown Brothers Harriman
STEPHANIE JIANNETTO-ALESI (Panelist), Citigroup

5:15 PM: DAY ONE ADJOURNS

5:30 PM: RECEPTION SPONSORED BY **KAPLAN**

8:30–8:45 AM | DISCUSSION OF DAY'S AGENDA AND ADMINISTRATIVE ANNOUNCEMENTS

8:45–10:00 AM | A DISCUSSION WITH IRS CHIEF COUNSEL

This always popular panel will cover key tax technical issues and provide a forum for government and industry to exchange views on key topics.

JOHN STAPLES (Moderator), E&Y

TARA N. FERRIS (Panelist), E&Y

PHILLIP GARLETT (Panelist), E&Y

NANCY LEE (Panelist), Internal Revenue Service

JOHN SWEENEY (Panelist), Internal Revenue Service

10:00–10:15 AM: REFRESHMENT BREAK

10:15–11:15 AM | A DISCUSSION WITH IRS OFFICIALS

The morning continues with a discussion with those charged with administering the U.S. withholding and reporting rules. Hear directly on where the IRS stands on their efforts to implement FATCA. Hear also how the IRS plans to ensure compliance with all of the withholding and reporting regimes under their jurisdiction.

CYRUS DAFTARY (Moderator), IHS Markit | CTI Tax Solutions

JOHANNA MCGEADY (Panelist), Internal Revenue Service

WILLIAM HOLMES (Panelist), Internal Revenue Service

11:15 AM–12:30 PM | THE COMMON REPORTING STANDARD: EMERGING ISSUES AND IMPLEMENTATION STRATEGIES

The CRS regime continues its steady spread across the globe as ever expanding numbers of countries commit to the goal of ensuring tax transparency. Can the U.S. be far behind? And more importantly for our U.S. attendees, do you know how these rules are affecting your offshore businesses? It is fundamentally important to stay on top of these rules and have a thorough understanding of what it takes to ensure compliance.

CHRIS PHILLIPS, Deutsche Bank AG

MICHAEL BREVETTA, Standard Chartered Bank

JENNY TURNER, UBS AG

KEVIN V. SULLIVAN, Bank of America

12:30–1:30 PM: LUNCHEON **LOSCALZO** SPONSORED BY **INSTITUTE**

1:30–2:30 PM | FOCUS ON IRW ISSUES IN THE FUND WORLD

Managing FATCA, CDOT and CRS compliance has been particularly challenging for the fund industry. Learn about some of the challenges funds have been having with their investors, subscription documents and fund administrators/upstream custodians. Are there things that funds and their counterparties can do differently to improve the process on both sides?

RICK ABBOTT, Advent International

JTOM GENGLER, GoldenTree Asset Management

CHRISTOPHER LIGUORI, State Street Global Services

3:00 PM: CONFERENCE ADJOURNS

CO-CHAIRPERSONS



JOHN STAPLES
Principal, E&Y



CHIP K. COLLINS
Managing Director, UBS AG

FACULTY

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Tax Director • Advent International

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JULIA MILLS

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Washington National Tax Group •
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Chief, Branch 8 • Office of Associate
Chief Counsel (International) •
Internal Revenue Service

JENNY TURNER
Global Head of Tax • UBS AG

MARKUS WEBER
Partner • Deloitte Tax LLP

DAVID WEISNER
SVP, Head of Products & Practice Team
for Global Tax Services •
Brown Brothers Harriman

CLE, CPE, ENROLLED AGENT, AND PARTICIPATION CREDITS

Attendees desiring a certificate verifying participation in the conference, have several options during the registration process. It is up to each attendee to check with their governing organization and obtain verification prior to attending the event.

CPE CREDITS

ANNUAL FORUM ON TAX WITHHOLDING AND INFORMATION REPORTING

Course Objective:

To understand the complexities inherent in the cross-border withholding tax regulations, and determine the potential client relations and risk implications inherent in these rules.

Prerequisites: Basic knowledge of withholding regulations.

Course Level: Intermediate

INFORMATION RETURN REPORTING AND WITHHOLDING BOOTCAMP

Course Objective: To understand the fundamentals of the withholding regulations.

Prerequisites: None

Course Level: Basic

Advance Preparation for Both: None

Instructional Method for Both: Group-Live

Credits for These Meetings are In: Taxes

Conference only..... 13.0 credits

Bootcamp only..... 7.0 credits

Conference & Bootcamp.....20.0 credits

CONTINUING LEGAL EDUCATION CREDIT

These activities have been approved for Minimum Continuing Education Legal Education Credit by the State Bar of California and the State Bar of New York. These activities conform to the standards for approved education activities prescribed by the rules and regulations of the State Bars of California and New York governing Minimum Continuing Legal Education. It will be the responsibility of the attendee to verify with their home state regarding reciprocity credit and the forms needed to request CLE credit. EEI will not be applying for CLE credit in states other than listed prior. Some states accept participation at other states, and this may vary depending on each state's rules and regulations. We are no longer applying for CLE in states other than New York and California. To verify acceptance and hours in your state, or other states, please contact the respective local State Bar Association.

For CLE: This course is not approved for transitional credits.

ENROLLED AGENT CREDIT

We will be applying with the IRS for CE and reporting the credits directly to them following the conference, with certificates being issued following the conference.

PARTICIPATION CERTIFICATE

For those attendees who would like a certificate to provide verification of participation. No continuing education credit is associated with this certificate. Certificates will be issued following the conference.



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Please Request Credits When Registering.

New York State CPE Credit

CPE credits for these meetings are in Taxes. Sponsor #000604.

Recommended credits: See NASBA section for details.

California CLE Credit

These activities have been approved for Minimum Continuing Legal Education Credit by the State Bar of California in the amount of 11 hours for the conference and 17 hours for the conference and workshop. Executive Enterprise Institute certifies that these activities conform to the standards for approved education activities prescribed by the rules and regulations of the State Bar of California governing Minimum Continuing Legal Education.

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Questions? Call: 877.739.2626



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Shrewsbury, NJ 07702
info@eeiconferences.com

EVENT PRICING

Full Conference Pass (November 16–18)

Early Bird: \$2,495; Regular: \$2,520

Includes the 31st Annual Tax Withholding Conference and the Information Return Reporting & Withholding Bootcamp

Two-Day Conference Pass (November 17–18)

Early Bird: \$1,695; Regular: \$1,720

Includes the 31st Annual Tax Withholding Conference only

Bootcamp Only (November 16)

Early Bird: \$1,095; Regular: \$1,120

Includes the Information Return Reporting & Withholding Bootcamp only

Early Bird pricing ends 10/31/2016

CONFERENCE MATERIALS

All registered attendees will receive an ELECTRONIC (PDF) copy of the materials for the session(s) they are scheduled to attend. PDFs of the materials will be available approximately two weeks prior to the event's start date. PRINTED COPIES can be pre-ordered for an additional fee of \$25 each, and will be available to pick up at the conference.

TEAM DISCOUNTS

REGISTER **5 OR MORE** ATTENDEES
AND **SAVE UP TO \$200/PERSON.***

Bootcamp: Save \$75/person

Conference Only: Save \$150/person

Bootcamp & Conference: Save \$200/person

*Attendees must attend the same sessions and register at the same time. Discounts cannot be combined. All discount offers expire 10/31/2016.

HOTEL RESERVATIONS

Please reserve a room from our room block by calling the hotel directly. To obtain our preferred hotel rate, be sure to identify yourself as an Executive Enterprise Institute attendee and include the name of the program you are attending. Make your reservations early, as our room block is subject to release 30 days prior to the meeting or earlier if the block sells out. If you are making reservations through a travel agent, please request your reservation be placed in our room block.

PAYMENT POLICY

Payment is due upon registering. Registrants may pay by check, MasterCard, VISA, or American Express. Payment includes the cost of continental breakfast(s), luncheon(s), refreshments, evening reception on Thursday, and an electronic (PDF) copy of the event's notebook. Federal Tax ID 13 4100476.

CANCELLATIONS & SUBSTITUTIONS

Registrations may not be split between attendees. Substitutions may be sent up to one week prior to the event. In order to receive a refund (see schedule below), your written cancellation must be received by midnight on October 31, 2016. Cancellation notifications should include your name, contact details and the name, date, and location of the event; and can be sent to:

Executive Enterprise Institute
1151 Broad Street, Suite 214
Shrewsbury, NJ 07702
info@eeiconferences.com

CANCELLATION RECEIVED	REFUND DETAILS
Before October 15, 2016	Full refund
October 15–31, 2016	Full refund minus \$100 processing fee
After October 31, 2016	No refund