

2022 LICONY TAX CONFERENCE SEMINAR

Thursday, October 27, 2022 8:50 A.M. – 4:30 P.M.

8:50 AM - 9:00 AM **W**

Welcome

- Timothy Atkins, Managing Director, LICONY
- Nick Cifelli, Lead Director, Equitable Chair, LICONY Tax Subcommittee

9:00 AM - 10:00 AM

State & Local Tax Update

This panel will present an overview of current state and local tax issues, including the NYS franchise tax, sales and use tax of digital goods and services, and mobile workforce (post-covid).

Panelists:

- Regina Saint Jour, AVP Tax Planning, Advisory & Audits, Lincoln Financial Group
- Steve Rauch, Principal, EY, Indirect Tax
- Gerardo (Jerry) S. Malanga, CVP State Taxes, NY Life

10:00 AM - 11:00 AM

International and M&A Tax

This panel's goals are to understand the international tax aspects of Pillar 1 and Pillar 2 and review jurisdictional tax reforms in various countries. Understand the tax implications of reinsurance, Deferred Acquisitions Costs (DAC), Applicable Asset Acquisitions and Section 1060, IRC Section 338 & insurance transactions, unified loss rules and product taxes related to insurance mergers and acquisitions.

Panelists:

- Arash Barkhordar, Principal, Mazars
- Christopher Peters, Partner, Willie Farr & Gallagher LLP
- Daniel Priest, Partner, Debevoise & Plimpton LLP

11:00 AM - 11:15 AM

BREAK

11:15 AM - 12:15 PM

Company Tax Update

This panel will present an overview of Federal income tax updates including the Inflation Reduction Act and other accounting updates. It will also discuss the latest trends in return to office and tax department operating models.

Panelists:

- Eli Katz, Managing Director, Deloitte Tax
- Samuel Schwartz, Head of Tax, Equitable
- * KT Gim, Head of Tax, Guardian



12:15 PM - 1:15 PM **LUNCH BREAK**

1:15 PM - 2:15 PM Privilege Challenges to Remote Work: Keeping Up with Legal Ethics

This panel will cover hot topics in legal ethics, including recent developments in privilege challenges, language access and client communication requirements under ABA Opinion 500, cybersecurity and data breaches, and updates on the ethics of remote work, including ABA Opinion 498.

Panelists:

- Amy Richardson, Partner, HWG LLP
- Deepika Ravi, Partner, HWG LLP

2:15 PM - 3:15 PM Tax Controversy

This panel will review current and future state of tax controversy with the IRS.

Panelists:

- Sarah Sheldon, VP Tax Legal, Lincoln Financial Group
- Tom Greenaway, Principal, KPMG
- Barbara Kaplan, Co-Chair of Global Tax, GreenbergTraurig, LLP

3:15 PM - 3:30 PM **BREAK**

3:30 PM - 4:30 PM Product Tax Update

This panel will present an overview of pending legislative proposals affecting the federal income taxation of life insurance products, the proposed required minimum distribution regulations, changes to the withholding rules, and guidance on distributions that will satisfy the "SEPP" exception.

Panelists:

- Mark Griffin, Partner, Davis & Harman LLP
- ❖ Landis Atkinson, Vice President Tax, TIAA
- Tamara Saverine, VP, Corporate Counsel, Prudential