

Eighth Retreat for Tax Executives

WEDNESDAY, NOVEMBER 8, 2023 | NEW YORK, NY



Time	Session
8:30 a.m. – 9:00 a.m.	Registration & Breakfast
9:00 a.m. – 9:10 a.m.	<p>Welcome Dirk Suringa, Incoming Chair of Covington’s Tax Practice</p>
9:10 a.m. – 10:10 a.m.	<p>Controversy Case Studies Drawing on recent administrative controversy and litigation experiences and recent cases of note (<i>FedEx</i>, <i>3M</i>, <i>Liberty Global</i>, and more), this panel will discuss lessons for the tax enforcement environment facing multinationals, including 1) the types of issues the government is raising in various tax disputes, 2) strategies taxpayers may wish to implement in areas such as challenging post-TCJA guidance, 3) best practices before and during examinations, and 4) the use of APAs and other programs to navigate transfer pricing uncertainty.</p> <p>Kevin Otero, Covington Tax Partner Jeremy Spector, Covington Tax Partner Kandyce Jayasinghe, Covington Tax Special Counsel Lauren Ross, Covington Tax Special Counsel</p>
10:10 a.m. – 11:00 a.m.	<p>Developments in International Tax Planning The panel will address recent developments on Pillars I and II, their potential interaction with current US tax regimes such as GILTI and other domestic rules including the CAMT, and how the new global tax landscape will affect multinational tax planning.</p> <p>Ansgar Simon, Covington Tax Partner (Moderator) Dirk Suringa, Covington Tax Partner Elnaz Manoucheri, Covington Tax Associate Jamin Koo, Covington Tax Associate Joe Sullivan, Covington Tax Associate</p>
11:00 a.m. – 11:15 a.m.	Break
11:15 a.m. – 12:15 p.m.	<p>Fireside Chat (without the fire) with Elizabeth Askey, IRS Appeals Sean Akins, who heads our tax litigation practice, will sit down with Liz Askey to discuss the IRS Independent Office of Appeals’ strategic vision, priorities, and plans for the future, its focus on client service, and the challenges and opportunities it faces in the coming years.</p> <p>Sean Akins, Covington Tax Partner Liz Askey, Deputy Chief of the Independent Office of Appeals at the IRS</p>

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12:30 p.m. – 2:15 p.m.	<p>Lunch at Wolfgang's Steakhouse <i>Lobby of the Times Building</i></p>
2:30 p.m. – 3:45 p.m.	<p><i>Tax Executives Forum</i> Dan Luchsinger will moderate a panel of in-house tax executives on the global challenges arising today and over the next five years, from increasing tax controversy to the chaos of global legislation to the implementation of Pillar II, and what this all means for tax departments of multinational companies.</p> <p>Sarah Burnham, Raytheon Technologies Senior Director, Tax Alees Marti, Starbucks Senior Manager, Domestic Tax Planning Stacey McGrath, Silgan Holdings Vice President, Tax Kanthimathi Morrisey, IBM Vice President, Tax Casey Murphy-Gerry, Johnson & Johnson Vice President, Global MedTech Tax Planning <u>Dan Luchsinger</u>, Covington Tax Partner (Moderator)</p>
3:45 p.m. – 4:00 p.m.	<p>Break</p>
4:00 p.m. – 5:30 p.m.	<p><i>“Moore” Tax Controversy</i> Discussion of important tax controversy topics, including the new Schedule UTP, responding to complex discovery requests, Employee Retention Credit audits, Tax Court practice, and looking ahead to the Supreme Court’s review of <i>Moore</i>.</p> <p><u>Sean Akins</u>, Covington Tax Partner <u>Mark Mosier</u>, Covington Appellate Partner <u>Ansgar Simon</u>, Covington Tax Partner <u>Mike Chittenden</u>, Covington Tax Of Counsel <u>Kandyce Jayasinghe</u>, Covington Tax Special Counsel <u>Lauren Ross</u>, Covington Tax Special Counsel</p>
5:30 p.m. – 7:30 p.m.	<p>Topping Things Off: Food & Drink at Castell Rooftop Lounge <i>Castell Rooftop Lounge</i></p> <p>Leave the deep thinking behind and please join us at Castell’s for cocktails, hors d’oeuvres, and a view of the New York City skyline.</p>