The Philadelphia Tax Conference (PTC) is a 30-year old section 501(c)(3) organization established to foster education and to heighten awareness of fair and appropriate tax policy. PTC actively seeks members of the tax community to join its advisory board to help support its mission. For more information, please contact Wendi Kotzen at kotzenw@ballardspahr.com.

As the national representative of the legal profession, the mission of the American Bar Association Section of Taxation is to serve our members and the public through education and leadership to achieve an equitable, efficient, and workable tax system. Our publications, programs, and expert advice help you navigate the constantly changing landscape of tax law. To learn more and join the Section of Taxation, please visit www.americanbar.org/tax.

CONFERENCE ADVISORY BOARD
Alice G. Abreu, Temple University, Philadelphia, PA
Frank Angeleri, KPMG LLP, Philadelphia, PA
John Apadula, Comcast Corporation, Philadelphia, PA
Joan C. Arnold, Pepper Hamilton LLP, Philadelphia, PA
Saba Ashraf, Ballard Spahr LLP, Philadelphia, PA
Rebecca B. Carey, EY, Philadelphia, PA
J. Brian Davis, BakerHostetler, Washington, DC
Robert Deitz, Aramark, Philadelphia, PA
Joseph R. DeSanto, Toll Brothers, Inc., Horsham, PA
Timothy Duffy, Day & Zimmermann, Philadelphia, PA
Neil Feinstein, Deloitte Tax LLP, Philadelphia, PA
Kathleen M. Fratantoni, CBIZ MHM, LLC, Plymouth Meeting, PA
Martin A. Goldman, VWR International LLC, Radnor, PA
Paul A. Gordon, Morgan Lewis & Bockius LLP, Philadelphia, PA
Morgan Klinzing, Pepper Hamilton LLP, Philadelphia, PA
Wendi L. Kotzen, Ballard Spahr LLP, Philadelphia, PA
Hope P. Krebs, Duane Morris LLP, Philadelphia, PA
Timothy J. Leska, Susquehanna International Group, Bala Cynwyd, PA
Debbie Martino, Lincoln Financial Group, Radnor, PA
William Marx, Jr., Grant Thornton LLP, Philadelphia, PA
Lisa A. McLemore, McGladrey LLP, Blue Bell, PA
Kelley Cooper Miller, Reed Smith LLP, Washington, DC
Joy Sabino Mullane, Villanova University, Villanova, PA
Douglas W. Nakajima, Marcum LLP, Philadelphia, PA
Jennifer A. O’Leary, Pepper Hamilton LLP, Philadelphia, PA
David G. Shapiro, Saul Ewing Arnstein & Lehr LLP, Philadelphia, PA
David Shechtman, Drinker Biddle & Reath LLP, Philadelphia, PA
Amy B. Snyder, The Vanguard Group, Philadelphia, PA
John P. Young, Chubb, Philadelphia, PA
GENERAL INFORMATION

CONFERENCE CO-CHAIRS
John Apadula, Comcast Corporation, Philadelphia, PA
Neil Feinstein, Deloitte Tax LLP, Philadelphia, PA
Debbie Martino, Lincoln Financial Group, Radnor, PA

VENUE
Union League of Philadelphia
140 South Broad Street, Philadelphia, PA 19102-3003
Phone: (215) 563-6500  Website: http://www.unionleague.org/

REGISTRATION
Registration for the Conference is be available at the following website through Thursday, October 24, with an Early Registration discount available on or before Thursday, October 10. To register online or through the mail, please visit the following website:
www.americanbar.org/groups/taxation/events_cle/19ptc_resources/

All cancellation and refund requests must be received by Thursday, October 24. All refunds will incur a $50 cancellation fee. Absolutely no refunds will be granted after the deadline. To request a refund, please email taxmeeting@americanbar.org.

Registration will be available at the Union League of Philadelphia at 7:15 a.m. on Monday, October 28, and 7:00 a.m. on Tuesday, October 29. All individuals attending any part of the Conference must register and pay the registration fee.

<table>
<thead>
<tr>
<th>Early Registration (Through Oct. 3, 2019)</th>
<th>FEE</th>
</tr>
</thead>
<tbody>
<tr>
<td>ABA Tax Section Member</td>
<td>$640</td>
</tr>
<tr>
<td>Past Conference Attendee (Non-ABA)</td>
<td>$640</td>
</tr>
<tr>
<td>First Time Conference Attendee</td>
<td>$510</td>
</tr>
<tr>
<td>Full-Time Professor / Non-Profit / Government</td>
<td>$350</td>
</tr>
<tr>
<td>One Day Rate</td>
<td>$365</td>
</tr>
<tr>
<td>Full-Time J.D., LL.M., or M.T. Candidates</td>
<td>FREE</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Regular Registration (After Oct. 3, 2019)</th>
<th>FEE</th>
</tr>
</thead>
<tbody>
<tr>
<td>ABA Tax Section Member</td>
<td>$670</td>
</tr>
<tr>
<td>Past Conference Attendee (Non-ABA)</td>
<td>$670</td>
</tr>
<tr>
<td>First Time Conference Attendee</td>
<td>$550</td>
</tr>
<tr>
<td>Full-Time Professor / Non-Profit / Government</td>
<td>$375</td>
</tr>
<tr>
<td>One Day Rate</td>
<td>$400</td>
</tr>
<tr>
<td>Full-Time J.D., LL.M., or M.T. Candidates</td>
<td>FREE</td>
</tr>
<tr>
<td>Time</td>
<td>Session Title</td>
</tr>
<tr>
<td>----------------------</td>
<td>-------------------------------------------------------</td>
</tr>
<tr>
<td>Monday, October 28</td>
<td>Registration and Continental Breakfast</td>
</tr>
<tr>
<td>7:15 a.m. – 8:15 a.m.</td>
<td>Opening Remarks</td>
</tr>
<tr>
<td>8:15 a.m. – 8:20 a.m.</td>
<td>State and Local Tax Update</td>
</tr>
<tr>
<td>9:35 a.m. – 9:45 a.m.</td>
<td>Networking Break</td>
</tr>
<tr>
<td>9:45 a.m. – 11:00 a.m.</td>
<td>Tax Accounting Methods</td>
</tr>
<tr>
<td>11:00 a.m. – 11:15 a.m.</td>
<td>Networking Break</td>
</tr>
<tr>
<td>11:15 a.m. – 12:30 p.m.</td>
<td>Employment Taxes</td>
</tr>
<tr>
<td>12:30 p.m. – 2:15 p.m.</td>
<td>Luncheon with Keynote Speaker</td>
</tr>
<tr>
<td>2:15 p.m. – 3:30 p.m.</td>
<td>Corporate Tax Update</td>
</tr>
<tr>
<td>3:30 p.m. – 3:45 p.m.</td>
<td>Networking Break</td>
</tr>
<tr>
<td>3:45 p.m. – 5:00 p.m.</td>
<td>The Emergence of Technology and Data Analytics in Tax Law</td>
</tr>
<tr>
<td>5:00 p.m. – 6:00 p.m.</td>
<td>Networking Cocktail Reception</td>
</tr>
<tr>
<td>Time</td>
<td>Session Title</td>
</tr>
<tr>
<td>--------------------</td>
<td>-------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Tuesday, October 29</td>
<td><strong>Registration and Continental Breakfast</strong></td>
</tr>
<tr>
<td>7:00 a.m. – 8:00 a.m.</td>
<td></td>
</tr>
<tr>
<td>8:00 a.m. – 8:05 a.m.</td>
<td><strong>Opening Remarks</strong></td>
</tr>
<tr>
<td>8:05 a.m. – 9:20 a.m.</td>
<td><strong>Section 163(j) Update</strong></td>
</tr>
<tr>
<td>9:20 a.m. – 9:30 a.m.</td>
<td><strong>Networking Break</strong></td>
</tr>
<tr>
<td>9:30 a.m. – 10:45 a.m.</td>
<td><strong>International Tax Update</strong></td>
</tr>
<tr>
<td>10:45 a.m. – 11:00 a.m.</td>
<td><strong>Networking Break</strong></td>
</tr>
<tr>
<td>11:00 a.m. – 12:15 p.m.</td>
<td><strong>Partnership Tax: The Latest From Washington</strong></td>
</tr>
<tr>
<td>12:15 p.m. – 1:00 p.m.</td>
<td><strong>Networking Luncheon</strong></td>
</tr>
<tr>
<td>1:00 p.m. – 2:15 p.m.</td>
<td><strong>What’s Keeping Tax Directors Up at Night? Key Issues and Concerns</strong></td>
</tr>
<tr>
<td>2:15 p.m. – 3:30 p.m.</td>
<td><strong>Ethics: What Your General Counsels Worry About</strong></td>
</tr>
</tbody>
</table>
DAY 1

Monday, October 28

7:15 a.m. – 8:15 a.m.          Lincoln Hall Foyer, 2nd Floor
Registration and Continental Breakfast

8:15 a.m. – 8:20 a.m.       Lincoln Hall, 2nd Floor
Opening Remarks
Conference Co-Chair
Debbie Martino, Lincoln Financial Group, Radnor, PA

8:20 a.m. – 9:35 a.m.       Lincoln Hall, 2nd Floor
State & Local Tax Update
This presentation will include a review of recent legislative trends and major administrative and case law developments in Pennsylvania and around the country. Topics are subject to change based on new developments but may include:
• Expanding notions of nexus;
• Internet sales and use tax issues;
• Statutory and regulatory changes affecting income and franchise tax apportionment;
• Combined reporting developments; and
• Transfer tax and property tax issues in Pennsylvania.
Moderator/Panelist
Wendi L. Kotzen, Ballard Spahr LLP, Philadelphia, PA
Panelists
Mark W. Yopp, McDermott Will & Emery, New York, NY

9:35 a.m. – 9:45 a.m.       Lincoln Hall, 2nd Floor
Networking Break

9:45 a.m. – 11:00 a.m.       Lincoln Hall, 2nd Floor
Tax Accounting Methods
A discussion regarding the tax accounting method considerations of domestic tax reform provisions, in areas such as;
• Proposed regulations implementing amendments to the All-Events test for revenue recognition, including a new GAAP conformity requirement, and advance payment deferral exceptions;
• Final bonus depreciation regulations;
• Other Tax Reform Accounting Methods Planning and Compliance;
• Reverse planning with accounting methods and elections;
• Special Accounting method considerations for CFCs under the GILTI regime; and
• BEAT mitigation.
Moderator/Panelist
Frank Angeleri, KPMG LLP, Philadelphia, PA

Panelists
Carol Conjura, KPMG LLP, Washington, DC
George A. Manousos, PwC, Washington, DC
Ellen McElroy, Eversheds Sutherland (US) LLP, Washington DC

11:00 a.m. – 11:15 a.m. Lincoln Hall, 2nd Floor
Networking Break

11:15 a.m. – 12:30 p.m. Lincoln Hall, 2nd Floor
Employment Taxes
This presentation will cover many payroll tax issues, ranging from current compliance, through audit exposures and refund claims, including;
• Continuing IRS payroll tax audits and litigation of myriad cash and noncash fringe benefits provided both to executives and to traveling workers;
• Payroll tax withholding procedural developments, including increased ability to litigate in Tax Court, and complexities of overpaying/underpaying the 0.9% Additional Medicare Tax;
• Increasing prevalence of unjustified penalties in payroll tax audits, plus new requirements to send Forms W-2C to collect taxes twice;
• State payroll tax audits; and
• Existing and pending federal legislation to limit these state payroll audits.

Moderator/Panelist
Martin A. Goldman, VWR International LLC, Radnor, PA

Panelist
Mary B. (Handy) Hevener, Morgan, Lewis & Bockius LLP, Washington, DC

12:30 p.m. – 2:15 p.m. Meade Room, 2nd Floor
Luncheon with Keynote Speaker

Keynote Speaker
Charles P. Rettig, Commissioner, Internal Revenue Service, Washington, DC
2:15 p.m. – 3:30 p.m. Lincoln Hall, Level 2
Corporate Tax Update

This panel will cover recent corporate tax developments, including published guidance as well as planning considerations. The topics may include, but are not limited to;

- Recent IRS/Treasury regulatory actions;
- Effect of the 2017 Tax Act on corporate transactions; and
- Spinoffs, including private letter ruling (PLR) policy.

Moderator/Panelist
William Marx, Jr., Grant Thornton LLP, Philadelphia, PA

Panelists
Gregory A. Fairbanks, Grant Thornton LLP, Washington, DC
Kelton P. Frye, Attorney, Office of Associate Chief Counsel (Corporate), Internal Revenue Service, Washington, DC
Eric Solomon, Washington, DC
Rose Williams, EY, Washington, DC

3:30 p.m. – 3:45 p.m. Lincoln Hall, Level 2
Networking Break

3:45 p.m. – 5:00 p.m. Lincoln Hall, Level 2
The Emergence of Technology and Data Analytics in Tax Law

The panel will discuss the emerging use of analytics and technology by tax departments to streamline complex tax reporting requirements, improve tax function operational efficiencies, and strengthen the enterprise tax planning process. Topics will include;

- An overview of the capabilities of analytics within the tax function, such as information extraction, data mining and management, visualization enhancements and Robotic Process Automation (RPA);
- The use of analytics and technology tools to improve tax efficiencies in global compliance and reporting, state apportionment, operational transfer pricing, partnership tax compliance and fixed asset data management;
- Effective use of analytics and technology in federal and state audits and litigation matters; and
- Managing transformative change within the tax function, with a focus on people, process and technology.
Moderator/Panelist
Edward A. Liva, Villanova University, Villanova, PA

Panelists
Zara Muradali, Grant Thornton LLP, Boston, MA
Scott M. Stein, PwC, New York, NY
Thomas J. Donnelly, Vice President, State & Local Tax, Comcast Corporation, Philadelphia, PA

5:00 p.m. – 6:00 p.m. Lincoln Memorial, Level 2
Networking Cocktail Reception
DAY 2

7:00 a.m. – 8:00 a.m. Lincoln Hall Foyer, Level 2
Registration and Continental Breakfast

8:00 a.m. – 8:05 a.m. Lincoln Hall, Level 2
Opening Remarks
Conference Co-Chair
John Apadula, Comcast Corporation, Philadelphia, PA

8:05 a.m. – 9:20 a.m. Lincoln Hall, Level 2
Section 163(j) Update
This panel will cover recent developments and hot topics related to section 163(j). Specific topics may include but are not limited to:
• A discussion of the most recent guidance related to section 163(j);
• Practical issues and traps for the unwary for C corporations and consolidated groups; and
• Open issues that may require additional guidance.
Moderator/Panelist
Debbie Martino, Lincoln Financial Group, Radnor, PA
Panelist
Julie Allen, PwC, Washington, DC
Jeff Borghino, Grant Thornton LLP, Washington, DC

9:20 a.m. – 9:30 a.m. Lincoln Hall, Level 2
Networking Break

9:30 a.m. – 10:45 a.m. Lincoln Hall, Level 2
International Tax Update
This panel will address the impact of the international and related provisions of the 2017 Tax Act, as well as other recent U.S. international tax developments, on individuals and private equity.
Moderator/Panelist
Neil Feinstein, Deloitte Tax LLP, Philadelphia, PA
Panelists
Joe Calianno, BDO USA, LLP, Washington, DC
David Warco, Deloitte Tax LLP, New York, NY
Danielle Rolfes, KPMG LLP, Washington, DC
10:45 a.m. – 11:00 a.m. Networking Break

11:00 a.m. – 12:15 p.m. Partnership Tax: The Latest From Washington

With the new partnership audit rules effective for tax years starting in 2018, this panel will address the state of guidance on this fundamental rule change. Guidance under sections 199A, 163(j), 168(k), 1061, and 1446(f) and the impact of the new rules on transactional planning will also be discussed.

Moderator/Panelist
David G. Shapiro, Saul Ewing Arnstein & Lehr LLP, Philadelphia, PA

Panelists
Eric B. Sloan, Gibson Dunn, New York, NY
Clifford M. Warren, Special Counsel, Passthroughs and Special Industries, Office of Chief Counsel, Internal Revenue Service, Washington, DC

12:15 p.m. – 1:00 p.m. Networking Luncheon

1:00 p.m. – 2:15 p.m. What’s Keeping Tax Directors Up at Night? Key Issues and Concerns

This panel concentrates on insomnia-inducing issues that tax directors routinely face including, but not limited to, U.S. tax reform, transparency, aggressive audits, interacting with senior management and the audit committee, and managing increased burdens and workloads with limited resources.

Moderator/Panelist
John P. Young, Chubb, Philadelphia, PA

Panelists
Madeleine Barber, CBRE, Philadelphia, PA
Angela Bekker, AIG, New York, NY
Gary Gaugler, Victaulic Company, Easton, PA
Hal Hicks, Skadden, Arps, Slate, Meagher & Flom LLP, Washington, DC
Daniel Kheel, MetLife, New York, NY
Ethics: What Your General Counsels Worry About

Tax firms of all kinds routinely deal with issues involving professional ethics, tax penalties, privileges, and potential malpractice exposure, and such matters are heightened during times involving regulatory uncertainty including tax reform. In this presentation we will discuss the rules and regulations that typically apply in various contexts and offer practical real-world advice on how to approach common sensitive situations, including discussing alignment of interests between clients and professionals when addressing risk or professional practice matters and when those interests could potentially diverge.

Moderator/Panelist
Alice G. Abreu, Temple University, Philadelphia, PA

Panelists
Matt Cooper, Deloitte Tax LLP, Washington, DC
Christopher S. Rizek, Caplin & Drysdale, Washington, DC
Melissa Wiley, EY, Washington, DC
CLE CREDIT
The ABA directly applies for and ordinarily receives CLE credit for ABA programs in AK, AL, AR, AZ, CA, CO, DE, GA, GU, HI, IA, IL, IN, KS, KY, LA, MN, MS, MO, MT, NH, NM, NV, NY, NC, ND, OH, OK, OR, PA, PR, SC, TN, TX, UT, VT, VA, VI, WA, WI, and WV. These states sometimes do not approve a program for credit before the program occurs. This transitional program is approved for both newly admitted and experienced attorneys in NY. Attorneys may be eligible to receive CLE credit through reciprocity or attorney self-submission in other states. For more information about CLE accreditation in your state, visit http://www.americanbar.org/groups/taxation/events_cle/inpersoncle.html or contact tim.brady@americanbar.org.

CPE CREDIT
The American Bar Association is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be submitted to the National Registry of CPE Sponsors through its website: http://www.learningmarket.org.

SCHOLARSHIP INFORMATION
A limited number of scholarships to defray tuition expenses are available for this program. To request a scholarship application, please email Genevieve.Lynn@americanbar.org. Scholarship applications must be received no later than 30 days prior to the program. For programs with tuition costs over $500, qualifying attorneys will receive at least a 50% reduction in the registration fee.

ABA OPEN MEETINGS POLICY
In accordance with the ABA Open Meetings Policy, all ABA programs are open to the media unless they are to conduct business sessions of a confidential nature. The Association encourages media coverage of its activities. If you have questions about this policy, please contact the Tax Section at +1.202.662.8670.

CONTENT DISCLAIMER
All Workshop and Conference content, including live, recorded, and written presentations, represents the opinions of the authors and speakers and should not be construed to be those of either the American Bar Association or Section of Taxation unless adopted pursuant to the bylaws of the Association. Nothing contained herein is to be considered as the rendering of legal advice for specific cases, and readers are responsible for obtaining such advice from their own legal counsel. This Workshop and Conference content and any forms and agreements herein are intended for educational and informational purposes only.

All rights reserved. No part of these materials may be reproduced, stored in a retrieval system, or transmitted, in any form by any means, electronic, mechanical, photocopying, recording, or otherwise, without the written permission of the American Bar Association.
<table>
<thead>
<tr>
<th>DATE</th>
<th>PROGRAM</th>
<th>LOCATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>December 11-13, 2019</td>
<td>36th National Institute on Criminal Tax Fraud</td>
<td>Wynn Las Vegas, NV</td>
</tr>
<tr>
<td>January 30-February 1, 2020</td>
<td>2020 Midyear Tax Meeting</td>
<td>Boca Raton Resort Boca Raton, FL</td>
</tr>
<tr>
<td>March 16-20, 2020</td>
<td>2020 ABA/IPT Advanced State Income, Sales/Use, and Property Tax Seminars</td>
<td>Royal Sonesta New Orleans, LA</td>
</tr>
<tr>
<td>April 1-3, 2020</td>
<td>20th Annual U.S. and Europe Tax Practice Trends Conference</td>
<td>Hotel Bayerischer Hof Munich, Germany</td>
</tr>
<tr>
<td>April 30 - May 2, 2020</td>
<td>2020 May Tax Meeting</td>
<td>Marriott Marquis Washington, DC</td>
</tr>
<tr>
<td>June 10-12, 2020</td>
<td>13th Annual U.S. and Latin America Tax Practice Trends Conference</td>
<td>Mandarin Oriental Miami, FL</td>
</tr>
<tr>
<td>September 24-26, 2020</td>
<td>2020 Fall Tax Meeting</td>
<td>Marriott Marquis New York, NY</td>
</tr>
</tbody>
</table>

ABA Section of Taxation Publications
www.ambar.org/taxpubs

*Effectively Representing Your Client Before the IRS: A Practical Manual for the Tax Practitioner with Sample Correspondence and Forms - 7th Edition*
Product Code: 5470821 • Regular Price: $299 • Tax Section Member Price: $249

Product Code: 5470811 • Regular Price: $99.95 • Tax Section Member Price: $79.95

*A Practitioners Guide to Tax Evidence* by Joni Larson
Product Code: 5470794 • Regular Price: $99.95 • Tax Section Member Price: $79.95

*Careers in Tax Law: Perspectives on the Tax Profession and What It Holds for You*
Product Code: 5470719 • Regular Price: $70 • Tax Section Member Price: $55 • Law Student Price: $25

*The Supreme Court, Federal Taxation, and the Constitution* by Jasper L. Cummings, Jr.
Product Code: 5470790 • Regular Price: $155 • Tax Section Member Price: $125

*The Sales & Use Tax Deskbook, 2016-2017 Edition* (includes CD-ROM and PDF)
Product Code: 5470818 • Regular Price: $285 • Tax Section Member Price: $225

*The Property Tax Deskbook, 2017 Edition* (includes CD-ROM and PDF)
Product Code: 5470819 • Regular Price: $285 • Tax Section Member Price: $225