



**41<sup>st</sup> Annual Insurance Tax Conference**

**November 10-11, 2016**

**Loews Chicago O'Hare Hotel**

**Session Descriptions**

## **State of the Industry**

Thursday, November 10th | 8:45am - 9:10am

The insurance business is constantly evolving and with that evolution comes changes in the regulatory, legal, and tax challenges we face. This session will provide an overview of significant developments since our conference in Las Vegas last year and a preview of what you will hear and learn at this year's conference.

Speaker: Joseph F. McKeever, III, Davis & Harman, LLP

## **Washington Update**

Thursday, November 10th | 9:10am - 10:00am

This session will examine the political, legislative, and regulatory consequences of the 2016 election. What can the country and the insurance industry expect from Washington? Will the gridlock break or continue with different players? Will fundamental tax reform finally advance or can we expect to see more modest changes?

Moderator: Joseph F. McKeever, III, Davis & Harman, LLP

Speaker: Randy Hardock, Davis & Harman LLP

## **Section 385 Regulations and Other Hot Topics**

Thursday, November 10th | 10:00am - 11:00am

This general session will review the biggest and most interesting developments of the year of interest to insurance tax professionals! As of press time, the panel is expected to focus on the proposed regulations issued under Section 385 relating to the characterization of debt vs. equity, with particular focus on the application of the regulations to the insurance industry. Similarly significant developments (if any) that arise before November will also be discussed.

Moderator: Tracy Williams, Sidley Austin LLP

Panelists: Erik Corwin, KPMG LLP

Deb Oates, Liberty Mutual

## **International Tax – Current Hot Topics of Interest to the Insurance Industry**

Thursday, November 10th | 11:30am - 12:30pm

This panel will address the insurance industry implications of current international tax regulatory and legislative proposals and actions.

Moderator: Joseph Tedesco, XL Catlin

Panelists: Brenda Viehe-Naess, Washington Advocates

Peter Schurr, Debevoise & Plimpton LLP

Sophia J. Boutilier, KPMG LLP

## **Coming Soon to an Annual Statement Near You: Principles Based Reserves**

Thursday, November 10th | 11:30am - 12:30pm

This panel will discuss state regulatory implementation of PBR, and the federal tax issues arising in connection with the move to PBR. We will provide an update on the development of tax guidance concerning PBR, and discuss open issues in that connection.

Moderator: Susan Seabrook, Buchanan Ingersoll & Rooney PC

Panelists: Kristin Norberg, Consultant  
Samuel Mitchell, Scribner, Hall & Thompson, LLP  
Regina Rose, ACLI  
Ann Cammack, Ernst & Young LLP

## **Primer: Introduction to Federal Income Taxation of Insurance Companies - Part 1**

Thursday, November 10th | 11:30am - 12:30pm

This panel will cover the basic federal income tax principles affecting life and property & casualty insurance companies. Part 1 will focus on statutory/ancillary authorities re: taxation of insurance companies; history of insurance company taxation; state regulation and tax accounting; definition of an insurance company vs. life insurance company; life insurance reserves. (PRODUCT TAX ISSUES WILL NOT BE COVERED DURING THIS SESSION.) The presentation is designed to be of interest to those with 1-4 years of experience in the industry.

Moderator: Tom Quinn, Tom Quinn Consulting

Panelists: Rob Finnegan, PricewaterhouseCoopers LLP  
John Adney, Davis & Harman, LLP

## **Primer: Introduction P&C Loss Reserves**

Thursday, November 10th | 11:30am - 12:30pm

This presentation will introduce and define the terms used in P&C company loss reserve estimates and explain, at a high level, the fundamental concepts underlying P&C loss estimation techniques, and review the legal authority relevant to a P&C loss reserve dispute. This session is designed for participants that have no experience with loss reserve issues. The presentation is designed to be of particular interest to those with 1-4 years experience in the industry.

Speaker: Tracy Williams, Sidley Austin LLP

## **Product Tax Update**

Thursday, November 10th | 1:45pm - 2:45pm

This panel will discuss product tax issues associated with the design, issuance and administration of life insurance and annuity products with an emphasis on recent guidance and rulings from the IRS and Treasury.

Moderator: Thomas M. Ronce, Pacific Life Insurance Company

Panelists: Chris Phanco, Pacific Life Insurance Company  
Mark Griffin, Davis & Harman, LLP

## **What You Need to Know About the Tax Accounting Control Framework**

Thursday, November 10th | 1:45pm - 2:45pm

Tax material weaknesses continue to make up a significant portion of all reported weaknesses in financial statement control environments. This session will discuss the tax accounting control framework, why it breaks down and how to design and maintain an efficient, control focused environment.

Moderator: Stephen D. Collier, TIAA Financial Services  
Panelists: Matt Lodes, PricewaterhouseCoopers LLP  
Scott Ducar, Athene Holding Ltd.

## **Primer: Introduction to Federal Income Taxation of Insurance Companies - Part 2**

Thursday, November 10th | 1:45pm - 2:45pm

This presentation continues with the basic federal income tax principles affecting life and property & casualty insurance companies. Part 2 will focus on federally prescribed reserve rules; proration; DAC; non-life insurance rules; consolidated returns. (PRODUCT TAX ISSUES WILL NOT BE COVERED DURING THIS SESSION.) The presentation is designed to be of interest to those with 1-4 years of experience in the industry.

Moderator: Tom Quinn, Tom Quinn Consulting  
Panelists: Rob Finnegan, PricewaterhouseCoopers LLP  
John Adney, Davis & Harman, LLP

## **Primer: International Tax**

Thursday, November 10th | 1:45pm - 2:45pm

This session will provide an overview of selected issues in connection with international tax, including the new passive foreign investment company (PFIC) regulations, and current issues in connection with controlled foreign corporations (CFCs) and section 953(d) companies. The presentation is designed to be of interest to those with 1-4 years of experience in the industry.

Panelists: Eli Katz, Deloitte Tax LLP  
Anna Rubinstein, AIG

## **Advanced M&A - Buy-Side Tax Planning and Integration**

Thursday, November 10th | 3:00pm - 4:00pm

This presentation will explore in depth key tax issues, and related accounting and regulatory concerns, that should be considered by acquiring companies in insurance industry acquisitions. Topics will include consolidated group planning (particularly for life/non-life groups); associated tax and other considerations related to financing; regulatory concerns implicated by tax planning; the preservation and use of acquired-company tax attributes (attribute reduction; limitations on the use of acquired tax attributes; triggering gains, DITs and ELAs in the target companies; potential for loss of basis); impact on statutory capital (e.g., reduction of admitted DTA upon closing) and potential implications on pricing and purchase price adjustments. This panel is geared to participants with a working knowledge of M&A transaction structures and a basic understanding of the consolidated return rules.

Moderator: Seth L. Rosen, Debevoise & Plimpton LLP  
Panelists: Aditi Banerjee, Prudential Financial, Inc.  
Vadim Mahmoudov, Debevoise & Plimpton LLP  
Christine Watson, PricewaterhouseCoopers LLP

## **Employee Compensation & Benefits**

Thursday, November 10th | 3:00pm - 4:00pm

This panel will discuss the most significant compensation and employee benefits issues faced by insurance companies today, including equity compensation issues, business travel and wellness plans, as well as issues that have been the subject of recent IRS examinations.

Moderator: Maria Jones, Miller & Chevalier Chartered  
Panelists: Catherine L. Creech, Ernst & Young LLP  
Todd S. Okesson, Athene Holding Ltd.  
Christopher Cramer, The Hartford

## **Primer: Introduction to P&C Annual Statement**

Thursday, November 10th | 3:00pm - 4:00pm

This session will walk through a P&C annual statement and how it is used in preparing an 110PC. The presentation is designed to be of interest to those with 1-4 years of experience in the industry.

Panelists: Jeff Webb, Deloitte Tax LLP  
Chery Knudson, Allianz Global Corporate & Specialty

### **Primer: Introduction to Life Annual Statement**

Thursday, November 10th | 3:00pm - 4:00pm

This session will be a practical walk through the life annual statement and where to find the information relevant for tax. The presentation is designed to be of interest to those with 1-4 years of experience in the industry.

Moderator: Kim Sellers, KPMG LLP  
Panelists: David Jones, KPMG LLP  
Matt Jones, KPMG LLP

### **Global Tax Transparency, Disclosure and Digitization**

Thursday, November 10th | 4:30pm - 5:30pm

BEPS, CRS, FATCA, UTP...What is the right speed to full compliance? Can competent authority keep up with audit assessments? How will tax professionals and departments be impacted long-term?

Moderator: Stephen D. Collier, TIAA Financial Services  
Panelists: Frank M. Douglass, PricewaterhouseCoopers LLP  
David L. Wiseman, PricewaterhouseCoopers LLP  
David Schulz, Transamerica

### **Tax Department Technology – Gaining Operational Efficiencies & Effectiveness**

Friday, November 11th | 8:30am - 9:30am

This session will provide insight to strategies that can improve the operational effectiveness of the modern insurance company tax function. The panel will explore a variety of technology and data management topics and emerging trends including:

- Advanced data management techniques to ensure data quality and efficiency gains
- SharePoint as a technology platform
- Spreadsheet trends, innovation and risk management
- Data robotics overview

Moderator: Matthew Haaf, Ernst & Young, LLP  
Panelists: Mark D. Schutzman, Ernst & Young LLP  
Angela Bekker, AIG

### **Ethics**

Friday, November 11th | 8:30am - 9:30am

This panel will consider some of the difficult ethical dilemmas common to the practice of tax and the principles, rules and opportunities for resolving them.

Moderator: Joseph F. McKeever, III, Davis & Harman, LLP  
Speaker: Christopher S. Rizek, Caplin & Drysdale

### **Primer: Tax Risk Management & Tax Accounting**

Friday, November 11th | 8:30am - 9:30am

This session will begin with an overview of the basic differences between FASB ASC 740 and SSAP No. 101, with a focus on the following key principles: current and deferred income taxes; deferred tax assets and liabilities; valuation allowances and the admissibility test; and income tax contingencies and the concept of uncertain tax positions. Following this overview, the panel will address tax risk management within the context of an integrated tax control framework. In this portion of the session, the panelists will share leading practice insights involving work processes, data and information, and technology. This session is designed for those individuals with 1-4 years of experience in the industry who have had minimal exposure to GAAP & STAT tax accounting.

Moderator: Joseph Tedesco, XL Catlin  
Panelists: Christopher P. Albert, Deloitte Tax LLP  
Steven Sutcliffe, MBIA

### **Primer: Life/Non-Life Consolidation**

Friday, November 11th | 8:30am - 9:30am

This presentation will cover the basic federal income tax principles affecting insurance company consolidations. Topics addressed in the session include eligibility for filing life/non-life consolidations, the tacking provisions of the consolidation return regulations, taxable income consolidation considerations and NOL and other attribute limitation provisions. This session is designed to be of interest to those who are new to life/non-life consolidation principles and have 1-4 years of experience in the industry.

Moderator: Julie Goosman, PricewaterhouseCoopers LLP  
Panelists: James Kress, PricewaterhouseCoopers LLP  
James Cubanski, The Hartford

### **Navigating the Maze of an Investment Tax System Implementation**

Friday, November 11th | 9:45am - 10:45am

This advanced session will highlight some of the key tax technical and technological challenges companies face when upgrading or implementing a new investment system with tax basis reporting capabilities. We will discuss the various alternatives available to dealing with those challenges and the pros and cons of such approaches. Company representatives will discuss their first hand experience with such implementations - come and learn from the experience of others!

Moderator: Julie Goosman, PricewaterhouseCoopers LLP  
Panelists: Kevin Onorato, Mass Mutual Financial Group  
Bob Morlath, Mass Mutual Financial Group

### **Primer: Introduction to Life Products**

Friday, November 11th | 9:45am - 10:45am

This presentation will cover the basics of the tax treatment of non-pension life insurance products. The panelists will cover the basic rule applicable to life insurance contracts and non-qualified annuities, variable contracts and contract exchanges. The session will also address the harsh consequences to the insurance company and the policyholders of failing to comply with these rules. The presentation is designed to be of interest to those with 1-4 years experience in the industry.

Moderator: Thomas M. Ronce, Pacific Life Insurance Company  
Panelists: Eric Lanning, Lincoln Financial Group  
Bryan Keene, Davis & Harman LLP

### **Primer: Introduction to Investments - Part 1**

Friday, November 11th | 9:45am - 10:45am

This presentation will cover the basics of "Schedule D" type investments made by life and property & casualty insurance companies and related federal income tax concepts. In Part 1, the panel will focus on an overview of Security Trading and Insurance Company Investments and then review primary investment tax adjustments on Debt Instruments that are encountered in preparing insurance company taxes. This includes identifying Debt Instruments with Original Issue Discount, Market Discount and Bond Premium and claiming deductions for Impairments, as well as helpful hints when reviewing Schedule D. The presentation is designed to be of particular interest to those with 1-4 years of experience in the industry.

Moderator: Dawn Cummings-Fritz, Zurich North America  
Panelists: Michael Yaghmour, Ernst & Young LLP  
Margaret Labno, Zurich North America

### **What's Happening at the IRS**

Friday, November 11th | 11:00am - 12:00pm

This panel will cover new developments in IRS examinations and Appeals, an update on the LB&I restructuring, and an overview of recent guidance from the Office of Chief Counsel.

Moderator: Maria Jones, Miller & Chevalier Chartered  
Panelists: Sheryl B. Flum, KPMG LLP  
Sharon Katz-Perlman, KPMG LLP  
James Shea, Prudential Financial, Inc.

## **Conformity and Convergence**

Friday, November 11th | 11:00am - 12:00pm

This session will distinguish between insurance and other financial products and what the courts have stated.

Moderator: Kim Sellers, KPMG LLP  
Panelists: Anthony Sciarra, Enstar  
Michael Goldstein, AIG  
Craig Pichette, Consultant

## **Primer: Taxation of Reinsurance: P&C and Life**

Friday, November 11th | 11:00am - 12:00pm

The panel will discuss the taxation of reinsurance transactions from the perspectives of both the ceding company (“seller”) and the assuming company (“buyer”), explain the differences between the tax treatment of indemnity reinsurance and assumption reinsurance and between life companies and P&C companies. The panel will also provide a brief explanation of the business reasons for reinsurance and possible IRS challenges to reinsurance transactions. The presentation is designed to be of interest to those with 1-4 years experience in the industry.

Moderator: Lawrence M. Friedman, Locke Lord LLP  
Panelists: Thomas Dickert, PricewaterhouseCoopers LLP  
Fred Campbell-Mohn, KPMG LLP

## **Primer: Introduction to Investments - Part 2**

Friday, November 11th | 11:00am - 12:00pm

This presentation continues from Part 1 and will cover the basic federal income tax concepts of “Schedule D” investments made by life and property & casualty insurance companies. In Part 2, the panel will focus on reviewing primary investment tax adjustments encountered in preparing insurance company taxes with respect to Structured, Tax Exempt and Convertible Debt Instruments, as well as Equities and an introduction to Wash Sales. The presentation is designed to be of particular interest to those with 1-4 years of experience in the industry.

Moderator: Dawn Cummings-Fritz, Zurich North America  
Panelists: Michael Yaghmour, Ernst & Young LLP  
Margaret Labno, Zurich North America

## **Ask The Experts**

Friday, November 11th | 12:15pm - 1:15pm

Each year, this is considered one of the most beneficial and instructive sessions as it provides attendees with access to the industry's top practitioners. This interactive session will allow attendees to exchange ideas with the conference speakers, moderators and each other, to solidify the most significant insights from the various conference panels.

Moderator: Stephen D. Collier, TIAA Financial Services

Panelists: Tracy Williams, Sidley Austin LLP

Kim Sellers, KPMG LLP

Mark Smith, PricewaterhouseCoopers LLP

Peter Winslow, Scribner, Hall & Thompson, LLP