

January 14, 2014

**Memorandum
to
Virginia Tax Study Group**

Re: Next meeting, Friday, April 11, 2014

Please Mark Your Calendar

The next meeting of the Virginia Tax Study Group will take place at the University of Virginia School of Law on Friday, April 11, 2014, starting at 9:30 am and ending about 5:00 pm. It will be followed by cocktails and dinner at the law school.

For those who wish hotel accommodations, we have reserved a set of rooms in The Residence Inn by Marriott, which is around the corner from the law school, for the nights of Thursday, April 10, and Friday, April 11. If you would like accommodations for one or more of those nights, please inform Dianna Davis (dmd7w@virginia.edu), who will then make the arrangements with the Inn. **Please note** that our arrangement with the Inn is only good until February 16, and we will need to reserve a room, if you ask us to, by that date. The cost of the room will be \$149, plus tax.

As you will see from the tentative schedule set forth below, the opening session for the program will be our usual “DC Panel” led by Cecily Rock, who will advise on 2014 tax law developments. The remaining sessions will all involve discussions of important tax policy and tax administration issues. We have a highly distinguished group of experts who will present and comment on these issues.

As we have in past years, we will make available written materials dealing with each of the substantive topics. We will send you an email with the Website location containing the papers and password information for access, and will send a PDF of the materials upon request. As usual, we have reserved a significant amount of time for audience involvement and hope that all of you will actively participate in the program throughout the day.

Tentative schedule

9:30 – 10:45: DC Panel led by Cecily Rock of the Joint Committee on Taxation, Cameron Arterton, Deputy Tax Legislative Counsel, Rohit Kumar, Principal, PricewaterhouseCoopers, and possibly others, will discuss what is likely to happen in the tax world in 2014.

10:45 – 11:00: break

11:00 – 12:30: The effect of recent events on the Internal Revenue Service. George Yin will present his proposal for reforming the IRS in the wake of last year’s controversy involving EO tax administration. Richard Skillman of Caplin & Drysdale and one other person will provide comment.

12:45 – 1:45: lunch. Gene Steuerle, Institute Fellow and Richard B. Fisher Chair, Urban Institute, Washington, D.C., will address the group during the lunch.

2:00 – 3:30: The future of partnership tax allocations. Bill Cavanagh, Chadbourne & Parke, New York, will lead a discussion on whether widespread use of targeted allocations is consistent with current law; Karen Burke, Professor of Law and Richard B. Stephens Eminent Scholar, Levin College of Law, University of Florida, and Curtis G. Wilson, Associate Chief Counsel, Passthroughs and Special Industries, IRS will comment.

3:30 – 3:45: break

3:45 – 5:15: International implications of the implementation of regulations under the Foreign Account Tax Compliance Act (FATCA). Five years ago, offshore tax evasion scandals and the global financial crisis created an international political imperative to address offshore tax evasion by attacking tax havens through blacklists and “counter-measures”. At the time, Itai Grinberg, Quyen Huynh and Michael Plowgian began to contemplate whether international and domestic developments (including FATCA) could be slowly turned into a multilateral system to more effectively enforce the taxation of capital income earned by individuals through offshore accounts. Five years later, the world has come a long way. The panelists will speculate on whether FATCA will produce a truly multilateral system to address offshore tax evasion. What should the U.S. and other countries now do – or not do – to preserve their interests in such a system without creating unreasonable costs for financial institutions? What did the U.S. Treasury get right in the last five years, what did it get wrong, and what remains unclear? Itai Grinberg, Associate Professor of Law, Georgetown University Law Center, will lead the discussion. Michael Plowgian, Principal, KPMG, LLP, Washington, D.C., and Quyen Huynh, Attorney-Advisor, Tax Legislative Counsel, will comment.

5:30 – 8:00: Cocktails and dinner at the law school.