

Virginia Tax Study Group

Friday, April 7, 2017

Schedule

9:30 – 10:45 Room WB128: DC Panel led by Cecily Rock of the Joint Committee on Taxation, Eric Solomon of Ernst and Young, Jonathan Traub (Deloitte), and possibly other participants, will discuss what is likely to happen in the tax world in 2017.

10:45 – 11:00: break

11:00 – 12:30 Room WB128: This panel will discuss the implications of the holding in *Altera Corp. and Subsidiaries*, 145 T.C. 91 (2015) (on appeal to 9th Cir.) on administrative practice of the Internal Revenue Service. James Malone, Lecturer, University of Virginia, Law School, will be the moderator for the panel, Alice Abreu, James E. Beasley Professor of Law, James E. Beasley School of Law, Temple University, Philadelphia, Pa.; Richard Skillman, Caplin & Drysdale; William Paul, Office of Chief Counsel, Internal Revenue Service, and A.Duane Webber, Baker & MacKenzie, Washington, D.C., will comment.

12:45 – 1:45 Purcell Reading Room: lunch. Nina Olson, Taxpayer Advocate, Internal Revenue Service will give the luncheon talk.

2:00 – 3:30 Room WB 128: The position of the European Union on “state aid” and what this would mean for the reform of U.S. taxation of international transactions. Ruth Mason, Professor of Law, University of Virginia, Law School, will be the moderator for the panel, and Lilian Faulhaber, Associate Professor of Law, Georgetown University Law Center, will lead the discussion, and Douglas Poms, Deputy International Tax Counsel, U.S. Treasury Department; Damien Levie, Head of the Trade and Agriculture Section, Delegation of the European Union, Washington, D.C., and Helena Malikova, EU Fellow, University of California, Berkeley, Cal. will comment.

3:30 – 3:45: break

3:45 – 5:15 Room WB128: Prospects for Corporate Tax Reform: Eric Solomon, Ernst & Young and former Assistant Secretary for Tax Policy will lead the discussion, and Alan Viard, Resident Scholar, American Enterprise Institute, Michael Schler, of counsel, Cravath, Swaine & Moore, Stephen E. Shay, Senior Lecturer on Law, Harvard Law School, and possibly others will comment.

5:30 – 8:00 Purcell Reading (Reception in Purcell Garden, weather permitting): Cocktails and dinner at the law school.