

Understanding the Global Tax Arena Risk & Regulation

Thursday, February 1, 2007

7:00 a.m. – **Registration and Continental Breakfast**

8:00 a.m.

8:00 a.m. – **Welcome Remarks and Symposium Mission**

8:15 a.m.

Douglas P. Bates, Vice President – Federal Relations,
Northwestern Mutual
Chairman, Board of Directors, Tax Council Policy Institute

Pamela F. Olson, Partner, Skadden, Arps, Slate, Meagher & Flom LLP

Mark A. Weinberger, Americas Vice Chairman–Tax, Ernst & Young LLP

8:15 a.m. – **Keynote Panel**

9:30 a.m. **Is the Global Wave of Change in Tax Risk Over or Just
Beginning?**

Moderator: Mark A. Weinberger, Americas Vice Chairman–Tax,
Ernst & Young LLP

Mark W. Everson, Commissioner, Internal Revenue Service

Dave Hartnett, Director General, Compliance Strategy & Business,
HM Revenue & Customs

R. Glenn Hubbard, Dean, Columbia Business School

9:30 a.m. – **Break**

10:00 a.m.

PROGRAM MANAGERS

 **ERNST & YOUNG**
Quality In Everything We Do

 **Skadden**
Skadden, Arps, Slate, Meagher & Flom LLP
60500000

Understanding the Global Tax Arena Risk & Regulation

10:00 a.m. – Session 2

11:15 a.m. **Inter-Governmental Cooperation and Information Sharing—
Where Are We Now?**

Moderator: Kenneth R. Petrini, Vice President–Taxes,
Air Products and Chemicals, Inc.

Robert D. Adams, Senior Advisor to the Commissioner – Large and Mid-
Size Business Division, Internal Revenue Service

Robert H. Green, Member, Caplin & Drysdale, Chartered

Elvin T. Hedgpeth, Deputy Director (International), Large and Mid-Size
Business Division, Internal Revenue Service

Emily A. Parker, Partner, Thompson & Knight LLP

11:15 a.m. – Session 3

12:30 p.m. **Tax Disclosures in Financial Statements: The FASB, SEC
and IRS Current Perspectives and Future Plan**

Moderator: Richard R. Jones, National Accounting, Ernst & Young LLP

Deborah M. Nolan, Commissioner, Large and Mid-Size Business Division,
Internal Revenue Service

Edward W. Trott, Board Member, Financial Accounting Standards Board

Joseph B. Ucuzoglu, Professional Accounting Fellow, Office of the Chief
Accountant, U.S. Securities and Exchange Commission

12:30 p.m. – **Lunch and Keynote Address**

2:00 p.m. Eric Solomon, Assistant Secretary for Tax Policy,
U.S. Department of the Treasury

PROGRAM MANAGERS



Understanding the Global Tax Arena Risk & Regulation

2:00 p.m. – Session 4

3:15 p.m. **Global Tax Enforcement Trends and Worldwide Risks**

Moderator: Armando Gomez, Partner, Skadden, Arps, Slate, Meagher & Flom LLP

David Bullington, Vice President–Tax Policy, Wal-Mart Stores, Inc.

Patrick J. Ellingsworth, Executive Vice President–Tax and Corporate Structure, Royal Dutch Shell plc

Donald L. Korb, Chief Counsel, Internal Revenue Service

3:15 p.m. – **Break**

3:45 p.m.

3:45 p.m. – Session 5

5:00 p.m. **Developing a Global Corporate Tax Risk Strategy**

Moderator: Richard G. Larsen, Global Director of Tax Risk Services and Americas Tax Leader for the Aerospace & Defense Sector, Ernst & Young LLP

Robin D. Beran, Director, Corporate Tax & Assistant Treasurer, Caterpillar Inc.

Rick D'Avino, Vice-President and Senior Tax Counsel, GE Capital and NBC Universal

William D. Hawkins, III, Senior Tax Counsel, The Coca-Cola Company

5:00 p.m. – Session 6

6:15 p.m. **Making the “Final Judgments” on Implementing the New Standard on Accounting for Uncertainty in Income Taxes**

Moderator: Neil D. Traubenberg, Vice President Corporate Tax, Sun Microsystems

Chester Abell, Jr., Director of Tax Accrual Services, Ernst & Young LLP

Paul A. Beswick, Practice Fellow, Financial Accounting Standards Board

Brett E. Cohen, Partner, Professional, Technical, Risk & Quality, PricewaterhouseCoopers LLP

PROGRAM MANAGERS

 **ERNST & YOUNG**
Quality In Everything We Do

 **Skadden**
Skadden, Arps, Slate, Meagher & Flom LLP
60500000

Understanding the Global Tax Arena Risk & Regulation

6:15 p.m. *Reception*

7:00 p.m. **Keynote Address**

Mike Crapo, United States Senator – Idaho

Dinner

PROGRAM MANAGERS

 **ERNST & YOUNG**
Quality In Everything We Do

Skadden
Skadden, Arps, Slate, Meagher & Flom LLP
© 2006

Understanding the Global Tax Arena Risk & Regulation

Friday, February 2, 2007

7:00 a.m. – **Continental Breakfast**
8:00 a.m.

8:00 a.m. – **Keynote Address**
8:45 a.m. Mark W. Olson, Chairman, Public Company Accounting Oversight Board

8:45 a.m. – **Session 7**
9:45 a.m. **Weighing the Costs and Benefits of the Trends on
Information Sharing, Transparency and Enforcement**

Moderator: Kenneth W. Gideon, Partner,
Skadden, Arps, Slate, Meagher & Flom LLP

Conrad W. Hewitt, Chief Accountant, U.S. Securities and Exchange
Commission

Andrew A. Laperriere, Managing Director, International Strategy and
Investment Group, Inc.

Robert Willens, Managing Director, Equity Research Department,
Lehman Brothers, Inc.

9:45 a.m. – **Break and Move to First Breakout Session**
10:15 a.m.

Understanding the Global Tax Arena Risk & Regulation

10:15 a.m. – Breakout Session 9 **The Ritz-Carlton Ballroom Salon III**
11:15 a.m.

Managing the Inherent Risks Created by Corporate Merger, Acquisition and Disposition Transaction Activity—Pitfalls and Best Practices

Moderator: Gerard B. Pompan, Global Transaction Tax Leader,
Ernst & Young LLP

Katherine M. Bristol, Partner, Skadden, Arps, Slate, Meagher & Flom LLP

Jeremy K. Cox, Senior Tax Attorney, Electronic Data Systems

Gregory A. Falk, National Principal in Charge, Mergers & Acquisitions Tax Practice, KPMG LLP

Breakout Session 10 The Ritz-Carlton Ballroom Salon I

Risk of Controversy with the Tax Authorities

Moderator: Nanci S. Palmintere, Vice President, Finance and Enterprise Services; Director, Global Tax and Trade; Intel Corporation

James L. Fitzgerald, Vice President–Tax, Dell Inc.

Robert P. Hanson, Director Tax Controversy and Risk Management Services, Ernst & Young LLP

David B. Robison, Senior Advisor, Tax Resolution Strategies, Skadden, Arps, Slate, Meagher & Flom LLP

Breakout Session 11 The Plaza Ballroom

The Changing Landscape on Penalties

Moderator: Fred W. Brenner, Jr., Vice President – Taxes, Steelcase, Inc.

E. Daniel Leightman, Partner, Gardere, Wynne Sewell LLP

Bryan Mayster, National Leader State and Local Tax Knowledge Management, PricewaterhouseCoopers LLP

B. John Williams, Jr., Partner, Skadden, Arps, Slate, Meagher & Flom LLP

PROGRAM MANAGERS

 **ERNST & YOUNG**
Quality In Everything We Do

 **Skadden**
Skadden, Arps, Slate, Meagher & Flom LLP
60101500

Understanding the Global Tax Arena Risk & Regulation

11:15 a.m. – *Move to Second Breakout Session*

11:30 a.m.

11:30 a.m. – Breakout Session 8

The Plaza Ballroom

12:30 p.m.

What Every Tax Professional Needs to Know about Securities Law and Risks Relevant to Tax Disclosures

Robert J. Kueppers, Deputy CEO, Deloitte & Touche USA LLP

Michael P. Rogan, Partner, Skadden, Arps, Slate, Meagher & Flom LLP

Breakout Session 9

The Ritz-Carlton Ballroom Salon III

Managing the Inherent Risks Created by Corporate Merger, Acquisition and Disposition Transaction Activity—Pitfalls and Best Practices

Moderator: Gerard B. Pompan, Global Transaction Tax Leader,
Ernst & Young LLP

Katherine M. Bristor, Partner, Skadden, Arps, Slate, Meagher & Flom LLP

Jeremy K. Cox, Senior Tax Attorney, Electronic Data Systems

Gregory A. Falk, National Principal in Charge, Mergers & Acquisitions Tax
Practice, KPMG LLP

Breakout Session 10

The Ritz-Carlton Ballroom Salon I

Risk of Controversy with the Tax Authorities

Moderator: Nanci S. Palminiere, Vice President, Finance and Enterprise
Services; Director, Global Tax and Trade; Intel Corporation

James L. Fitzgerald, Vice President—Tax, Dell Inc.

Robert P. Hanson, Director Tax Controversy and Risk Management
Services, Ernst & Young LLP

David B. Robison, Senior Advisor, Tax Resolution Strategies,
Skadden, Arps, Slate, Meagher & Flom LLP

12:30 p.m. *End*

PROGRAM MANAGERS

 **ERNST & YOUNG**
Quality In Everything We Do

 **Skadden**
Skadden, Arps, Slate, Meagher & Flom LLP
© 2007 Skadden