



INTERNATIONAL FISCAL ASSOCIATION
JOINT MEETING OF THE USA AND ITALY BRANCHES
SEPTEMBER 23-24, 2016
HOTEL ARTS, BARCELONA, SPAIN

AGENDA: Joint Meeting of the USA and Italy Branches

FRIDAY, SEPTEMBER 23

- 8:30 – 9:20 a.m. **Registration Opens**
- 9:20 – 9:30 a.m. **Welcome Remarks**
- 9:30 – 10:30 a.m. **M&A Update (US focus), including section 7874 and section 367(d) guidance**
Panelists: **Joseph Calianno**, BDO USA, LLP
 L.G. "Chip" Harter, PwC LLP
 Carlo Maria Paoella, McDermott Will & Emery
- 10:30 – 11:00 a.m. **Refreshment Break**
- 11:00 – 12:00 p.m. **M&A Update (Italy focus) including recent Revenue Agency Circular on LBO structures**
Panelists: **Carlo Galli**, Clifford Chance LLP
 Lewis J. Greenwald, Mayer Brown LLP
 Cesare Silvani, Maisto e Associati
- 12:00 – 1:00 p.m. **Criminalization of Tax Planning, including general audit in post-BEPS environments and practical strategies for minimizing exposure**
Panelists: **Donald Korb**, Sullivan & Cromwell LLP
 Scott Michel, Caplin & Drysdale, Chartered
 Andrea Pirola, Pirola Pennuto Zei & Associati
- 1:00 – 2:30 p.m. **Lunch**
- 2:30 – 3:30 p.m. **US Developments, including proposed section 385 regulations on debt-equity and impact on US-inbound structures**
Panelists: **John Merrick**, Internal Revenue Service
 Peter Blessing, KPMG LLP
 Maricla Pennesi, Baker & McKenzie
- 3:30 – 4:30 p.m. **Italy Developments including Patent Box Regime**
Panelists: **Eugenio Romita**, Gattai, Minoli, Agostinelli & Partners
 Giacomo Soldani, Luxottica Group
 Dirk Suringa, Covington & Burling LLP
- 4:30 – 5:00 p.m. **Refreshment Break**

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Friday, September 23 continued

5:00 – 6:00 p.m. **Italy-US Tax Treaty Developments, including implications of US Model Treaty**

Panelists: **Pedro Amat**, Cuatrecasas, Gonçalves Pereira
Patricia Brown, University of Miami
Stefano Giuliano, General Electric Company
Edward Osterberg Jr., Mayer Brown LLP

Evening **Dinner on the Hotel Arts Terrace**

SATURDAY, SEPTEMBER 24

9:00 – 10:30 a.m. **Tax amnesties for individuals (voluntary disclosure) and corporations (US foreign tax credit issues), including Italian voluntary disclosure program**

Panelists: **Carlomaria Setti**, Chiomenti Studio Legale
Stefano Tellarini, Ludovici & Partners
Carol Tello, Sutherland Asbill & Brennan LLP
Kenneth Vacovec, Vacovec, Mayotte & Singer LLP

10:30 – 11:00 a.m. **Refreshment Break**

11:00 – 12:30 p.m. **EU-US Developments, including State Aid, public CBCR, EU directives/regulations, etc.**

Panelists: **Robert Stack**, U.S. Treasury
Stefano Grilli, Gianni, Origoni, Grippo, Cappelli & Partners
Pasquale Pistone, IBFD
Philip West, Steptoe & Johnson LLP

12:30 p.m. **Box lunch and bus to train station for those going to the Madrid Congress (optional, extra fee)**