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 Paolella, 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)**