



NEW YORK STATE BAR ASSOCIATION
TAX SECTION



Annual Report

January 15, 2019

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New York State Bar Association

Tax Section

Annual Report for the 2018 Year

January 15, 2019

It has been an incredible year. The new tax law, commonly referred to as the TCJA, has provided taxpayers and their advisors with a seemingly unending supply of new things to learn. What was intuitive in prior years is no longer such, and any spare hours are spent parsing the statutory language, reading and writing articles and bar reports, participating in and attending conferences, and talking with representatives of the government.

The TCJA was passed quickly, without the typical opportunities to explore the words and make suggestions for revisions to improve the provisions. There is scant legislative history. The NYSBA Tax Section jumped in immediately to try to help identify issues and solutions to problems, publishing 10 reports on the statutory language of the major TCJA provisions in advance of guidance from Treasury and the IRS. We were writing on a blank slate, with little to no existing thought leadership to give us a head start in our knowledge. We worked closely with Treasury and the IRS to make sure we were publishing on a timely basis on subjects that would be useful to their guidance process.

Treasury and the IRS have now produced hundreds of pages of guidance, with the goal of making much of it effective in time for it to apply retroactively to the date of the passage of the TCJA. Their efforts have been tremendous. As guidance was issued, the NYSBA Tax Section responded with timely and extensive comments. We submitted comments on almost every piece of guidance issued by the government, within the short comment deadlines required in the guidance.

We also submitted a report on the New York State budget proposals, providing insights and perspective on the varied issues in the wake of TCJA as well as outside of those changes. Finally, we submitted reports on important federal subjects unrelated to the TCJA, including reports on the Section 385 regulations, mark-to-market taxation of derivatives, proposed regulations on foreign currency hedging, and donor advised funds.

It was an exhausting year for the NYSBA Tax Section. Yet, the energy of those involved has not wavered. Drafters came forward to volunteer to take on new reports, with some drafting multiple reports. Working groups comprised of law students to the most experienced thought leaders gathered to provide valuable input and feedback to the drafters. The Executive Committee carefully balanced policy, authority and practicalities in their focused review of the papers, assuring that the end products were insightful and useful. With multiple projects moving at a fast pace at any given time, it often felt like a full-time job for many on the Executive Committee. Finally, the support of Tiffany Bardwell, Cathy Teeter, and Ron Kennedy at the NYSBA in Albany, as well as Pam Dewland, who prepared the reports for publication and interfaced with the government, was invaluable.

For those who are not yet involved with the NYSBA Tax Section, now is the time to join. It is an amazing time to be a tax lawyer. Young lawyers know as much about the new law as those with significant time in practice. Getting involved with our report activities is a terrific way to learn and contribute. Attending our summer meeting, this year in Portland, ME, is a great place to make new contacts and friends.

Our work on the TCJA and the interactions with historic provisions of the law is nowhere close to being done. The government will be producing guidance on the new law for years to come. I leave the leadership team of this incredible organization with deep gratitude for all those who supported the Tax Section's efforts this year. It has been a memorable journey and I have grown in many ways. Thank you,

Karen Gilbreath Sowell
Chair

Appendix A

CLE Programs

2018 ANNUAL MEETING

Tax Section Annual Meeting

January 23, 2018 | New York Hilton Midtown | NYC

Up to 5.0 Total Credits: Professional Practice (Non-Transitional)

Morning Panels

9:15 am and 10:45 am | Rendezvous Ballroom and
Trianon Ballroom, 3rd Floor

SECTION CHAIR

Michael S. Farber, Davis Polk & Wardwell LLP

Luncheon

12:30 pm | Grand Ballroom, 3rd Floor

Afternoon Panel

2:15 pm | Grand Ballroom, 3rd Floor

State & Local Meeting/High Tea

4:15 pm | Gibson, 2nd Floor

8:45 am – 9:00 am

Business Meeting and Election of Officers

Trianon Ballroom, 3rd Floor

9:15 am – 10:30 am (Rendezvous)

Disruption and Uncertainty in Partnership Tax

This panel will discuss the possible changes to the new debt-allocation rules in the disguised sale regulations, the future of Revenue Ruling 91-32 in light of its possible codification and *Grecian Magnesite*, and the impact of various tax reform proposals on partnership tax.

Chair: **Phillip Gall**, Ernst & Young LLP, New York City

Karen Lohnes, PricewaterhouseCoopers LLP, Washington, DC

Bryan Rimmke, Attorney-Advisor, Office of Tax Policy, U.S. Department of the Treasury, Washington, DC

Michael Shulman, Shearman & Sterling LLP, New York City

Clifford Warren, Special Counsel, Office of Associate Chief Counsel, Passthroughs and Special Industries, Internal Revenue Service, Washington, DC

9:15 am – 10:30 am (Trianon)

Is Voluntary Compliance Becoming Less Voluntary? A Whistleblower Case Study and Other Tax Compliance Topics

This panel will discuss ethical issues related to the discovery, correction, and prevention of tax non-compliance, including a whistle-blower case that raises these issues, ethical considerations when handling an internal tax investigation, and advising clients on correcting past non-compliance.

Chair: **Megan L. Brackney**, Kostelanetz & Fink, LLP, New York City

Brian W. Kittle, Mayer Brown LLP, New York City

John P. Steines, New York University School of Law, New York City

Mario J. Verdolini, Davis Polk & Wardwell LLP, New York City

10:45 am – 12:00 pm (Rendezvous)

Selected Topics in Corporate Taxation

This panel will review selected current developments and other topics relevant to corporate tax.

Chair: **Neil J. Barr**, Davis Polk & Wardwell LLP, New York City

Lawrence Garrett, Ernst & Young LLP, Washington DC

Robert H. Wellen, Associate Chief Counsel (Corporate), Internal Revenue Service, Washington DC

Brett York, Attorney-Advisor, Office of Tax Legislative Counsel, U.S. Treasury, Washington DC

Sara B. Zabloutney, Kirkland & Ellis LLP, New York City

10:45 am – 12:00 pm (Trianon)

The Effects of Pending Federal Tax Legislation on State and Local Taxation

The panel will discuss the state and local tax implications of pending federal tax legislation (including the partnership audit rules), addressing principles of federal conformity, the effects of potential changes to the taxation of businesses with foreign operations, and the federal treatment of income from pass-through entities.

Chair: **Irwin M. Slomka**, Morrison & Foerster LLP, New York City

Joshua E. Gewolb, Harter Secrest & Emery LLP, Rochester

Helen Hecht, General Counsel, Multistate Tax Commission, Washington, DC

Alyse McLoughlin, McDermott Will & Emery, New York City

12:30 pm (Grand Ballroom)

Luncheon

William M. Paul, Acting Chief Counsel, Internal Revenue Service, Washington, DC

2:15 pm – 4:00 pm (Grand Ballroom)

Comprehensive Reform of the U.S. International Tax System

This panel will focus on the international aspects of the Tax Cuts and Jobs Act.

Chair: **Kathleen L. Ferrell**, Davis Polk & Wardwell LLP, New York City

Michael J. Caballero, Covington & Burling LLP, Washington, DC



Peter Connors, Orrick, Herrington & Sutcliffe LLP, New York City

Danielle Rolfes, KPMG LLP, Washington, DC

Andrew R. Walker, Milbank, Tweed, Hadley & McCloy LLP, New York City



This program is co-sponsored by The New York Bar Foundation

Register Online www.nysba.org/AM2018 | Get Social: #NYSBA18   

IMPORTANT INFORMATION

Under New York's MCLE rule, this program has been approved for a total of up to 5.0 credit hours (area of professional practice). This program will NOT qualify for credit for newly-admitted attorneys because it is not a basic practical skills program.

Discounts and Scholarships: New York State Bar Association members and non-members may apply for a discount or scholarship to attend this program, based on financial hardship. This discount applies to the educational portion of the program only. Under this policy, any member of our Association or non-member who has a genuine basis for their hardship, if approved, can receive a discount or scholarship, depending on the circumstances. Request for discounts or scholarships must be received prior to January 12, 2018. For more details, please contact Tiffany Bardwell in writing at New York State Bar Association, One Elk Street, Albany, New York 12207 or tbardwell@nysba.org.



Accommodations for Persons with Disabilities: NYSBA welcomes participation by individuals with disabilities. NYSBA is committed to complying with all applicable laws that prohibit discrimination against individuals on the basis of disability in the full and equal enjoyment of its goods, services, programs, activities, facilities, privileges, advantages, or accommodations. To request auxiliary aids or services or if you have any questions regarding accessibility, please contact Tiffany Bardwell at 518-487-5675.



For overnight room accommodations, please call the New York Hilton Midtown at 1-800-445-8667 and identify yourself as a member of the New York State Bar Association or on the web at www.nysba.org/am18accomm. The rate will be based on room selection (single/double occupancy) and arrival/departure dates with additional taxes and hotel fees. The discounted rate for January 21st and January 22nd is \$179 per night. The discounted rate for January 23rd through January 28th is \$229 per night. A rate of \$209 will be offered to those with overlapping dates. Reservations must be made by December 29, 2017.



For questions about this specific program, please contact Tiffany Bardwell at 518-487-5675. For registration questions only, please call the Member Resource Center at 800-582-2452. Fax registration form to 518-463-5993.



Section Chair
Karen Gilbreath Sowell, Esq.
Ernst & Young LLP
Washington, DC

NYSBA

Tax Section

Summer Meeting

**The Press Hotel
Portland, Maine**

June 22 – 24, 2018

Attendance at this meeting offers up to 7.5
MCLE credit hours in professional practice for
experienced attorneys only.



This program is co-sponsored by The New York Bar Foundation



IMPORTANT INFORMATION

The New York State Bar Association's Section and Meeting Services Department has been certified by the NYS Continuing Legal Education Board as an accredited provider of continuing legal education in the State of New York. **Under New York's MCLE rule, this program has been approved for a total of up to 7.5 credit hours in professional practice.** Regular Programming offers 6.0 credits, the optional luncheon program offers 1.5 credits. This is **NOT** a transitional program and is **NOT** suitable for MCLE credit for newly admitted attorneys.

DISCOUNTS AND SCHOLARSHIPS: New York State Bar Association members and non-members may receive financial aid to attend this program. Under this policy, anyone who requires financial aid may apply in writing, not later than seven working days prior to the program, explaining the basis of his/her hardship, and if approved, may receive a discount or scholarship. Scholarships apply to the educational portion of the program only. For more details, please contact: cteeter@nysba.org or Catheryn Teeter, New York State Bar Association, One Elk Street, Albany, New York 12207. 518-487-5573.

ACCOMMODATIONS FOR PERSONS WITH DISABILITIES: NYSBA will make reasonable modifications/accommodations to allow participation in its services, programs, or activities by persons with disabilities. NYSBA will provide auxiliary aids and services upon request. NYSBA will remove architectural barriers and communication barriers that are structural in nature where readily achievable. To request auxiliary aids or services or if you have any questions regarding accessibility, please contact Catheryn Teeter **at least 10 business days prior to the meeting start date** at cteeter@nysba.org or Catheryn Teeter, New York State Bar Association, One Elk Street, Albany, New York 12207. 518-487-5573.



GETTING TO PORTLAND and The Press Hotel, 119 Exchange St. Portland, Maine:

Portland International Jetport (PWM) offers direct flights to and from NYC (JFK, LaGuardia, Newark), Philadelphia and Washington, DC (Dulles, Reagan, Baltimore). Amtrak's Downeaster runs from Boston five times daily. Express buses also run to/from Logan airport. Just five miles from PWM, the hotel offers complimentary transportation from 5 am to 11 pm to and from the airport and the Portland Transportation Center (Amtrak, Bus Station).

HOTEL RESERVATIONS:

Reserve Your Room before May 22nd to receive our special rate of **\$399 single/double plus taxes at The Press Hotel.**

Rooms are also available at the **Hampton Inn Portland, 209 Fore Street** (a 7 minute walk from Press Hotel) **at the rate of \$279 single/double plus taxes.**

SCHEDULE OF EVENTS

Friday, June 22

- 4:00 – 6:00 pm** **Registration** – Press Hotel Art Gallery
- 6:00 – 7:00 pm** **Welcome Reception** – Composing Room
- Dinner** on your own
See page 7 for restaurant recommendations

Saturday, June 23

- 8:00 – 9:30 am** **Continental Breakfast** – Editorial Room/Art Gallery
- 8:00 am – Noon** **Registration** – Composing Room Foyer
- 9:00 am – Noon** **GENERAL SESSION** – Composing Room
- 9:00 – 9:10 am** **Tax Section Welcome** **NYSBA Welcome**
Karen Gilbreath Sowell, Esq. **Michael Miller**
Tax Section Chair **President, New York State Bar Association**
Ernst & Young LLP Albany, NY
Washington, DC
- 9:10 – 10:30 am** **Are You Feeling GILTI, or Just BEAT?**
Some [Unintended?] Intersections of the New International Tax Rules
Join us to discuss the frustrating fracas of international tax reform, where new acronyms are layered on top of vintage rules. The panel will cover puzzling issues involving foreign tax credits, previously-taxed income, basis, expense allocation and more. We will also consider how this fabulous new world applies to consolidated groups and partnerships.
- Panel Chair:** **Kimberly S. Blanchard, Esq.**
Weil, Gotshal & Manges LLP
New York City
- Panelists:** **Marjorie A. Rollinson, Esq.** **Stephen E. Shay, Esq.**
Associate Chief Counsel (International)
Internal Revenue Service Harvard University
Washington, DC Boston, MA
- Jose E. Murillo, Esq.** **William L. McRae, Esq.**
Ernst & Young LLP Cleary Gottlieb Steen & Hamilton LLP
Washington, DC New York City
- 10:30 – 10:45 am** **Coffee Break**
- 10:45 am – Noon** **A Token Gesture:**
Tax Considerations for Cryptocurrencies and Utility Tokens
This panel will focus on the tax consequences to both issuers and purchasers of cryptocurrencies and utility tokens. We will discuss the new meaning of forks (they are not just for eating) and SAFEs (they are not just for protecting your will).
- Panel Chair:** **John T. Lutz, Esq.**
McDermott Will & Emery LLP
New York City

Continued on Next Page...

SCHEDULE OF EVENTS

Saturday, June 23 *continued*

10:45 am – Noon **A Token Gesture** *continued...*

Panelists:

Karl T. Walli, Esq.

Senior Counsel, Office of Tax Policy
U.S. Department of the Treasury
Washington, DC

Lisa M. Zarlenga, Esq.

Steptoe & Johnson
Washington, DC

Edward E. Gonzalez, Esq.

Skadden, Arps, Slate, Meagher & Flom LLP
New York City

Noon – 1:30 pm

State & Local Tax Committees Luncheon and CLE (Registered Attorneys Only):
PREREGISTRATION IS REQUIRED. CLE program runs from 12:15 – 1:30 pm.

2018-2019 New York State Budget Bill: What's In, What's Out & What it All Means?

This panel will discuss certain provisions of the 2018-2019 New York State enacted budget, as well as proposals that were not enacted. We will explore how these developments may impact the landscape of state and local taxation in New York State and City, including how the enacted budget provisions may result in lack of clarity, areas of controversy, planning opportunities, traps for the unwary, new administrative guidance, and future legislative action.

Panel Chair:

Jack Trachtenberg, Esq.

Deloitte Tax LLP
New York City

Panelists:

Megan L. Brackney, Esq.

Kostelanetz & Fink, LLP
New York City

Paul R. Comeau, Esq.

Hodgson Russ LLP
Buffalo

Leah S. Robinson, Esq.

Mayer Brown LLP
New York City

OPTIONAL GROUP WALKING TOURS:

2:00 – 5:00 pm

THE CULINARY PALETTE – ARTS & CULTURE WALKING TOUR

Portland is steeped in rich local and maritime history. Join Maine Foodie Tours as we uncover the storied past of the city - sampling imaginative local dishes and confections enroute to visiting local art galleries and exploring the city's cultural and historical highlights. Tour starts at the US Customs House, 312 Fore St., and concludes at the Portland Museum of Art, 7 Congress St. **\$85 per person includes VIP admission to Portland Museum of Art that may also be used on Sunday. Preregistration required.**

2:00 – 3:30 pm

GREATER PORTLAND LANDMARKS TOUR: THE GATEWAY TO COMMERCE & INDUSTRY IN PORTLAND

Congress Street forms the commercial and transportation spine of the Portland peninsula. Ironically, the street was once far beyond the borders of the waterfront settlement at the foot of India Street. Business and commercial activity spread toward Congress from the waterfront; a transition accelerated by the Great Fire of 1866. By the 1900's, Congress Street was the commercial center of the city - new offices replaced older commercial buildings; the first skyscraper was finished in 1910. Learn about the history of the area, its industries and its current revitalization. **Meet in Press Hotel Lobby at 1:50 pm to depart for tour. \$10 per person. Preregistration required.**

6:30 – 10:00 pm

OFFSITE RECEPTION & DINNER AT BRICK SOUTH, THOMPSON'S POINT

Transportation provided to and from venue. Meet in hotel lobby; bus will make two runs to venue – departures at 6:15 and 6:25 pm. For those driving, directions will be provided.

SCHEDULE OF EVENTS

Sunday, June 24

7:30 – 9:30 am Continental Breakfast – Art Gallery

8:00 – 9:00 am Executive Committee Breakfast Meeting – Editorial Room

8:00 am – Noon Registration – Composing Room Foyer

9:15 am – Noon GENERAL SESSION – Composing Room

9:15 – 10:30 am Relearning Corporate Transactions

This year's "usual corporate panel" is not about reorganizations or spin-offs, but will discuss how corporate transactions will adapt to a new menu of good and bad ideas.

Panel Chair: **William D. Alexander, Esq.**
Skadden, Arps, Slate, Meagher & Flom LLP
Washington, DC

Panelists: **Tijana J. Dvornic, Esq.** **Kathleen L. Ferrell, Esq.**
Wachtell, Lipton, Rosen & Katz LLP Davis, Polk & Wardwell LLP
New York City New York City

John J. Merrick, Esq.
Senior Level Counsel to the Associate Chief Counsel
(International)
Internal Revenue Service
Washington, DC

10:30 – 10:45 am Coffee Break

10:45 am – Noon Aggregate vs. Entity Theory after TCJA

Discussion on the manner in which various provisions of the TCJA address partnerships using an entity approach, an aggregate approach or a hybrid of both approaches.

Panel Chair: **Michael B. Shulman, Esq.**
Shearman & Sterling LLP
New York City

Panelists: **Andrew W. Needham, Esq.** **Amanda H. Nussbaum, Esq.**
Cravath, Swaine & Moore LLP Proskauer Rose LLP
New York City New York City

Krishna P. Vallabhaneni, Esq.
Deputy Tax Legislative Counsel
U.S. Treasury Department
Washington, DC

Meeting Adjourns

THINGS TO DO AT IN PORTLAND



Portland Head Light

Commissioned by President George Washington, Portland Harbor's 1791 sentry is the United States' first lighthouse and purported to be the most photographed in the world. Surrounded by crashing waves, a picturesque cliff walk meanders along the edge of Fort Williams Park leading to markers of Longfellow's visits, base history, and famed shipwreck of the Annie C. Maguire. The white tower glows against the sparkling blues of ocean and sky, but experiencing the historic light during inclement weather forces anyone to appreciate the necessity for these elegant icons.

Cruise Casco Bay

For those eager to witness playful seals and nesting osprey, sea tours and cruises created expressly for wildlife viewing are your best option. Jump on a Casco Bay Lines ferry to one of Portland's many island communities or take the Mailboat Cruise down the bay and back. You can purchase tickets in the Casco Bay ferry terminal or at www.cascobaylines.com.

Explore Old Port

Explore South Portland's Old Port/Commercial Street - an area full of full of turn of the century brick buildings, restaurants, bars, coffee shops, art galleries, and boutiques to buy whatever your heart desires, Jump aboard the **Lucky Catch** - learn about conservation fishing and get a scenic tour of the Bay while trying your hand at being a lobsterman. At the end of the tour, you can purchase your catch and have it cooked up nearby at the Portland Lobster Company. www.luckycatch.com.

Portland Museum of Art, 7 Congress Square

PMA is the largest and oldest public art institution in the Maine. Founded as the Portland Society of Art in 1882 Current exhibitions include, German Art in a Time of Crisis, highlighting the complete portfolio of George Grosz's 1922 The Robbers, 30 prints executed between the World Wars. www.portlandmuseum.org

Maine Historical Society & Wadsworth-Longfellow House, 489 Congress Street

Located on a one-acre campus in the heart of downtown. It is comprised of the Longfellow House, home of 19th-century poet Henry Wadsworth Longfellow; the Brown Library; the MHS Museum and Shop; and the Maine Memory Network, a statewide digital museum. Daily guided tours of the Longfellow House. Call 207-774-1822 for times. www.mainhistory.org

Craft Breweries

Portland is known for its food and craft beer. Grab a bite and a brew. Visit Allagash, Shipyard, Sebago, Bissell Brothers, Rising Tide, Lone Pine, Foundation Brewing or one of many other local companies for a tasting.

Peaks Island

Accessible by a 20-minute ferry ride across the bay from the mainland, Peak's Island is part of the city of Portland. The perfect spot for visitors to Portland seeking a thriving artist community and historic sites such as the Battery Steele, a large artillery bunker with 16-inch gun emplacements, the Eighth Maine Regimental Memorial, etc. Rent a bike at Brad's Bike Rental for a cruise along the Island's many trails (207-766-5631).

FOR MORE INFORMATION ON PORTLAND, MAINE GO TO:

WWW.VISITPORTLAND.COM

RESTAURANTS IN PORTLAND

Hugo's, 88 Middle St., 207-774-8538; www.hugos.net

James Beard Fdn Award Winner for Best Chef in the Northeast in 2009, chef/owner Rob Evans worked at the Inn at Little Washington and the French Laundry before opening this spot. Local fish figures prominently including poached Casco Bay cod, spice-roasted monkfish, and panko-crusted day boat scallops all artistically served. A nightly "blind tasting menu" packed with surprises to please adventurous eaters. Don't miss the "peanut butter cup" dessert.

Fore Street, 288 Fore St., 207-775-2717; www.forestreet.biz

Chef/owner Sam Hayward, winner of the James Beard Fdn Award for Best Chef in the Northeast in 2004, was a leader in showcasing local ingredients before it was in vogue. Lots of rustic wood fired dishes.

Five Fifty-Five, 555 Congress St., 207-761-0555; www.fivefifty-five.com

Known for its truffled lobster mac n' cheese, but not the only reason to eat here - excellent hanger steak and local diver scallops and homemade ice cream to boot!

Duckfat, 43 Middle St., 207-774-8080; www.duckfat.com

Very informal lunch spot where it's all about duck fat fried french fries, roasted beet salads, tuna melts and BGT - bacon, goat cheese, and tomato panini - are also great.

Portland Lobster Company, 180 Commercial St., 207-775-2112; www.portlandlobstercompany.com

This laid-back eatery, found on the dock near Commercial Street, is a quintessential example of the genre: All ordering is done at the cashier, and there is seating both indoors and at outdoor picnic tables shaded by red umbrellas. *The Lobster shack* to try.

Union, Off the Lobby of The Press Hotel, 207-808-8700; www.unionportland.com

A grande tour of what Maine has to offer. Contemporary American farm-to-table restaurant; three and five course tasting menus offered nightly. Breakfast, lunch and dinner.

Eventide Oyster Co., 68 Middle St., 207-774-8538; www.eventideoysterco.com

Extensive raw oyster bar serving at least ten Maine oyster varieties. Eventide is one of the best places to taste local seafood. If you prefer to skip the raw stuff, try the nutty, buttery oyster stew or the brown butter lobster roll.

Scales, Maine Wharf, 68 Commercial St. (bet. Dry Dock & RI-Ra), 207-805-0444; www.scalesrestaurant.com

Situated on the Maine Wharf, Scales offers a ton of fresh seafood as well as creative entrees they like to call "land-food". Dinner only.

The Corner Room, 110 Exchange St., 207-879-4747; www.thecornerroomkitchenandbar.com

Rustic Italian-inspired menu including fresh house made pastas, pizzas, antipasti, and artisanal breads. The Corner Room also offers one of the best happy hours around. Brunch, lunch and dinner.

Petite Jacqueline, Corner 46 Market St. & Milk St., 207-553-7044; www.bistropj.com

Like a Parisian neighborhood café. Its menu is packed with French staples like a croque-madame sandwich. Come for the rotating daily specials: on a cold day, there's often fondue or steak au poivre to keep you warm. Brunch, lunch and dinner.

Vinland, 593 Congress St., 207-653-8617; www.vinland.me

Drawing from indigenous food traditions along with those of the Acadians, New Englanders, and other peoples of the North Atlantic, the cuisine of Vinland is an expression of our place and history. The first restaurant in the US to serve 100% local, organic food - gluten-free and paleo-friendly. Dinner only.

Central Provisions, 414 Fore St., 207-805-1085

Savor artisan food paired with locally produced beer and craft cocktails. Farm-fresh dishes are infused with nostalgic American flavors and make use of a variety of fruits, vegetables, meats, and herbs. Lunch and dinner.

Appendix B:

Reports

NEW YORK STATE BAR ASSOCIATION 2018 TAX SECTION REPORTS

REPORT NUMBER REPORT

- 1385** Letter commenting on Proposed Regulations Providing Guidance on the Definitions of Registration-Required Obligation and Registered Form
- 1386** Letter and Report commenting on Notice 2017-57: Alternative Rules for Determining Section 987 Gain or Loss
- 1387** Letter requesting Immediate Guidance under Sections 864(c)(8) and 1446(f)
- 1388** Letter and Report commenting on Section 965
- 1389** Letter and Report commenting on the Mark-to-Market Taxation of Derivatives
- 1390** Letter and Report commenting on Notice 2017-73 – Donor-Advised Funds
- 1391** Report commenting on 2018-2019 New York State Executive Budget
- 1392** Letter and Report commenting on Section 199A Deduction
- 1393** Letter and Report commenting on Section 163(j)
- 1394** Letter and Report commenting on the GILTI Provisions of the Code
- 1395** Letter relating to the Section 385 Per Se Stock Rules
- 1396** Letter and Report commenting on the Provisions of the New Tax Law affecting Tax Exempt Organizations
- 1397** Letter and Report commenting on Base Erosion and Anti-abuse Tax
- 1398** Letter and Report addressing Sections 864©(8) and 1446(f) of the Internal Revenue Code of 1986
- 1399** Letter and Report on Foreign Derived Intangible Income
- 1400** Letter and Report on Proposed Foreign Currency Hedging Regulations
- 1401** Letter and Report on Proposed Section 965 Regulations
- 1402** Letter and Report on Previously Taxed Earnings under Section 959
- 1403** Letter and Report on Proposed Section 199A Regulations
- 1404** Letter and Report on Section 245A
- 1405** Letter and Report on Proposed Regulations Under Section 168(k) Relating to Immediate Expensing of Capital Investments
- 1406** Report on Proposed GILTI Regulations



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