

New York State Bar Association
Tax Section Summer Meeting | Arlington, VA
Hilton Arlington Rosslyn the Key, 1900 Fort Myer Drive, Arlington, VA
Friday, June 12 – Sunday, June 14, 2026

5.5 MCLE Credits in Areas of Professional Practice

This program is transitional and is suitable for all attorneys including those newly admitted.

Agenda

Friday, June 12

4:00 p.m. – 6:00 p.m.

Registration – Hilton Arlington Rosslyn the Key Hotel

6:00 p.m. – 9:00 p.m.

**Welcome Reception and Dinner
Open Road Restaurant
Rosslyn, VA**

Saturday, June 13

8:00 a.m. – 3:15 p.m.

Registration [Hilton]

8:00 a.m. – 9:00 a.m.

Breakfast [Hilton]

9:00 a.m. – 9:30 a.m.

Welcoming Remarks

Lawrence M. Garrett, Esq., Section Chair
Ernst & Young, LLP
Boca Raton, FL

9:30 a.m. – 10:45 a.m.

Perennial Issues and Brain Teasers in Transactional Practice

Potential topics include contributions of debt to capital; treatment of issuers and holders; developments in the IRS's private letter ruling practice for spin-offs.

Moderator

Brian D. Krause, Esq.
Paul, Weiss, Rifkind, Wharton & Garrison LLP
New York, NY

Panelists

Krishna Vallabaneni, Esq. (invited)
Tax Legislative Counsel
U.S. Treasury Department
Washington, DC

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

Theron West (invited)
Attorney Advisor
Office of Tax Policy
U.S. Treasury Department
Washington, DC

Edward S. Wei, Esq.
Gibson, Dunn & Crutcher LLP
New York, NY

Lulu Ma, Esq.
Ernst & Young LLP
Los Angeles, CA

1.5 Credits in Areas of Professional Practice

11:00 a.m. – 12:00 p.m.

**Issues Relating to Federal / State / Local Conformity or
Disconformity**

Moderator

Jack Trachtenberg, Esq.
Deloitte Tax LLP
New York, NY

Panelists

[government panelist – TBD]

Elizabeth Pascal, Esq.
Hodgson Russ LLP
New York, NY

1.0 Credit in Areas of Professional Practice

12:00 p.m. – 1:15 p.m.

Lunch (TBD)

Keynote Speaker

Thomas Barthold (invited)
Chief of Staff
Joint Committee on Taxation

Washington, DC

1:15 p.m. – 2:45 p.m.

Developments in U.S. International Taxation

Potential topics include Final and Proposed Regulations under Section 892; Sourcing of Stock Borrow Fees under Notice 2025-63; Application of Section 987 to CFCs

Moderator

William McRae, Esq.
Cleary, Gottlieb, Steen
& Hamilton LLP
New York, NY

Panelists

James Wang, Esq. (invited)
International Tax Counsel
U.S. Treasury Department
Washington, DC

Erika W. Nijenhuis, Esq. (invited)
Special Counsel
Office of Tax Policy
U.S. Treasury Department
Washington, DC

Peter H. Blessing (invited)
Associate Chief Counsel (International)
Washington, DC

Robert Scarborough, Esq. (invited)
Special Counsel
Office of the Associate Chief Counsel (International)
Washington, DC

Kathryn A. Kelly, Esq.
Gibson, Dunn & Crutcher LLP
New York, NY

Vadim Noviq, Esq.
Fried, Frank, Harris, Shriver & Jacobson LLP
New York, NY

Elena Romanova, Esq.
Latham & Watkins LLP
New York, NY

Lee Holt, Esq.
Ernst & Young LLP
New York, NY

Rebecca Lee, J.D., LL.M.
Dechert LLP
Washington, DC

1.5 Credits in Areas of Professional Practice

3:30 p.m. – 5:30 p.m.

[Optional Activity – TBD]

6:30 p.m. – 7:30 p.m.

Cocktail Reception [Hilton]

7:30 p.m. – 9:30 p.m.

Dinner [Hilton]

Keynote Speaker

Rebecca Burch (invited)

Deputy Assistant Secretary for International Tax Affairs
U.S. Treasury Department

Sunday, July 14

8:00 a.m.

Registration

8:00 a.m. – 9:00 a.m.

Executive Committee Meeting [Hilton]

8:30 a.m. – 9:30 a.m.

Breakfast [Hilton]

9:15 a.m. – 10:30 a.m.

**Critical Issues in the Application of the Endowment Tax
under Section 4968**

Moderator

Stuart L. Rosow, Esq.
Proskauer Rose LLP
New York, NY

Panelists

[government panelist – TBD]

Rachel Leiser Levy, Esq.
Deloitte LLP
Washington, DC

Jill Manny
Professor of Law
New York University School of Law
New York, NY

Jodi J. Schwartz, Esq.
Wachtell, Lipton, Rosen & Katz
New York, NY

1.5 Credit in Areas of Professional Practice

10:30 a.m.

Adjourn