



**Tax
Section**



TAX SECTION 2026 SUMMER MEETING

Friday, June 12 – Sunday, June 14, 2026

Hilton Arlington Rosslyn the Key
1900 Fort Myer Drive, Arlington, VA

NYSBA.ORG

6.0

MCLE Credits

TAX SECTION SUMMER MEETING

SECTION & PROGRAM CHAIR

Lawrence M. Garrett, Esq.

Ernst & Young, LLP
Boca Raton, FL

6.0 MCLE Credits

This program is transitional and approved for MCLE credit in New York for all attorneys, including those newly admitted.

6.0 Total Credits: 6.0 Areas of Professional Practice

The New York State Bar Association has been certified by the New York State Continuing Legal Education Board as an accredited provider of continuing legal education in the State of New York. For information about the CLE Rules, visit NYCOURTS.GOV/ATTORNEYS/CLE

FRIDAY, JUNE 12TH

4:00 p.m. – 6:00 p.m.

Registration – Hilton Arlington Rosslyn the Key Hotel | Shenandoah

6:00 p.m. – 9:00 p.m.

Welcome Reception and Dinner

Open Road Restaurant | 1201 Wilson Blvd Suite 213, Arlington, VA

SATURDAY, JUNE 13TH

8:00 a.m. – 3:15 p.m.

Registration | Potomac Pre- Function

8:00 a.m. – 9:00 a.m.

Breakfast | Potomac Ballroom

9:00 a.m. – 9:15 a.m.

Welcoming Remarks

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

Michelle H. Wildgrube, Esq., President-Elect
New York State Bar Association
Schenectady, NY

9:15 a.m. – 10:30 a.m.

Perennial Issues and Brain Teasers in Transactional Practice

Building on two Tax Section reports (one already submitted and another on its way), this interactive panel tackles selected – and often vexing – issues that arise in complex transactions, with a focus on areas where practice and policy intersect. Panelists will explore current thinking, inside and outside the government, on the tax consequences of contributions of debt to capital and recent developments in the IRS's private letter ruling practice for corporate spin-offs.

Moderator

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

Panelists

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

John B. Lovelace (invited)
Senior Technician Reviewer
Office of Associate Chief Counsel (Corporate)
Internal Revenue Service
Washington, DC

Krishna P. Vallabhaneni (invited)
Tax Legislative Counsel
U.S. Treasury Department
Washington, DC

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

Stuart J. Goldring, Esq.
Weil, Gotshal & Manges
New York, NY

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

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

1.5 Credits in Areas of Professional Practice

10:30 a.m.- 10:45 a.m.

Break

AGENDA

10:45 a.m. – 12:00 p.m.

Recent SALT Controversies and Updates in New York and Beyond

The panel will spotlight key issues and updates with the 2026-2027 NYS Budget, including provisions decoupling from the “One Big Beautiful Bill Act,” as discussed in a recent Tax Section report. The session will then look beyond New York to address critical state cases and controversies that are impacting the SALT landscape across the U.S.

Moderator

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

Panelists

Aaishah Hashmi (invited)
Corporate Tax Counsel (SALT)
DC Office of Tax & Revenue
Washington, DC

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

Michael Tedesco, Esq.
Baker McKenzie LLP
New York, NY

1.5 Credits in Areas of Professional Practice

12:00 p.m. – 1:15 p.m.

Lunch | Potomac Ballroom

Keynote Speaker
Thomas Barthold (invited)
Chief of Staff
Joint Committee on Taxation
Washington, DC



**SHOW YOUR NYSBA
PRIDE WHILE
CELEBRATING OUR
150TH ANNIVERSARY**



**CHOOSE FROM VARIOUS PRODUCTS,
COLORS, AND SIZES.**

**NOTE: OPTIONS INCLUDE USING THE 150TH
LOGO OR THE REGULAR NYSBA LOGO**

**PURCHASE TODAY!
NYSBA.ORG/MERCH**



TAX SECTION SUMMER MEETING

1:15 p.m. – 2:45 p.m.

Developments in U.S. International Taxation

This panel provides a timely update on significant developments in U.S. international tax law and policy. Three recent Tax Section reports will provide the touching off point for an insightful dialogue with government policy makers. Topics will include the treatment of debt acquisitions and the determination of effective control in recently issued final and proposed regulations under Section 892, the scope of residence-of-the-recipient sourcing of stock borrow fees under Notice 2025-63, and a proposed election for controlled foreign corporations not to compute or recognize gain or loss under Section 987(3).

Moderator

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

Panelists

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

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

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

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

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

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

Rebecca Lee, Esq.
Dechert LLP
Washington, DC

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

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

1.5 Credits in Areas of Professional Practice

3:15 p.m. – 5:45 p.m.

Optional Activity – A Guided Tour of the U.S. Treasury Department Building
(Must be registered 48 hrs in advance)

6:30 p.m. – 7:30 p.m.

Cocktail Reception | Georgetown

AGENDA

7:30 p.m. – 9:30 p.m.

Dinner | Potomac Ballroom

Keynote Speaker
Rebecca Burch (invited)
Deputy Assistant Secretary for International Tax Affairs
U.S. Treasury Department

SUNDAY, JUNE 14TH

8:00 a.m.

Registration | Potomac Pre-Function

8:00 a.m. – 9:00 a.m.

Executive Committee Meeting | Shenandoah

7:30 a.m. – 9:00 a.m.

Breakfast | Georgetown

9:15 a.m. – 10:30 a.m.

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

This panel will examine interpretive questions and technical challenges arising under the excise tax on the net investment income of certain colleges and universities under Section 4968 as amended by the “One Big Beautiful Bill Act.” A forthcoming Tax Section report highlights several of those important changes including expanding the tax base (e.g., by including royalties derived from federally-funded intangibles and student loan interest); increasing the student threshold, which may limit application of the tax only to larger schools; and raising potentially applicable tax rates, which considerably raised the stakes. Panelists will discuss issues presented by these changes, compliance considerations, and areas where further guidance is needed, offering practical insights for institutions and advisors navigating this evolving regime.

Moderators

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

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

Panelists

Andrew Lai (invited)
Legislation Counsel
Joint Committee on Taxation
Washington, DC

Chelsea Rubin (invited)
Attorney
Office of the Chief Counsel (Exempt Organizations)
Internal Revenue Service
Washington, DC

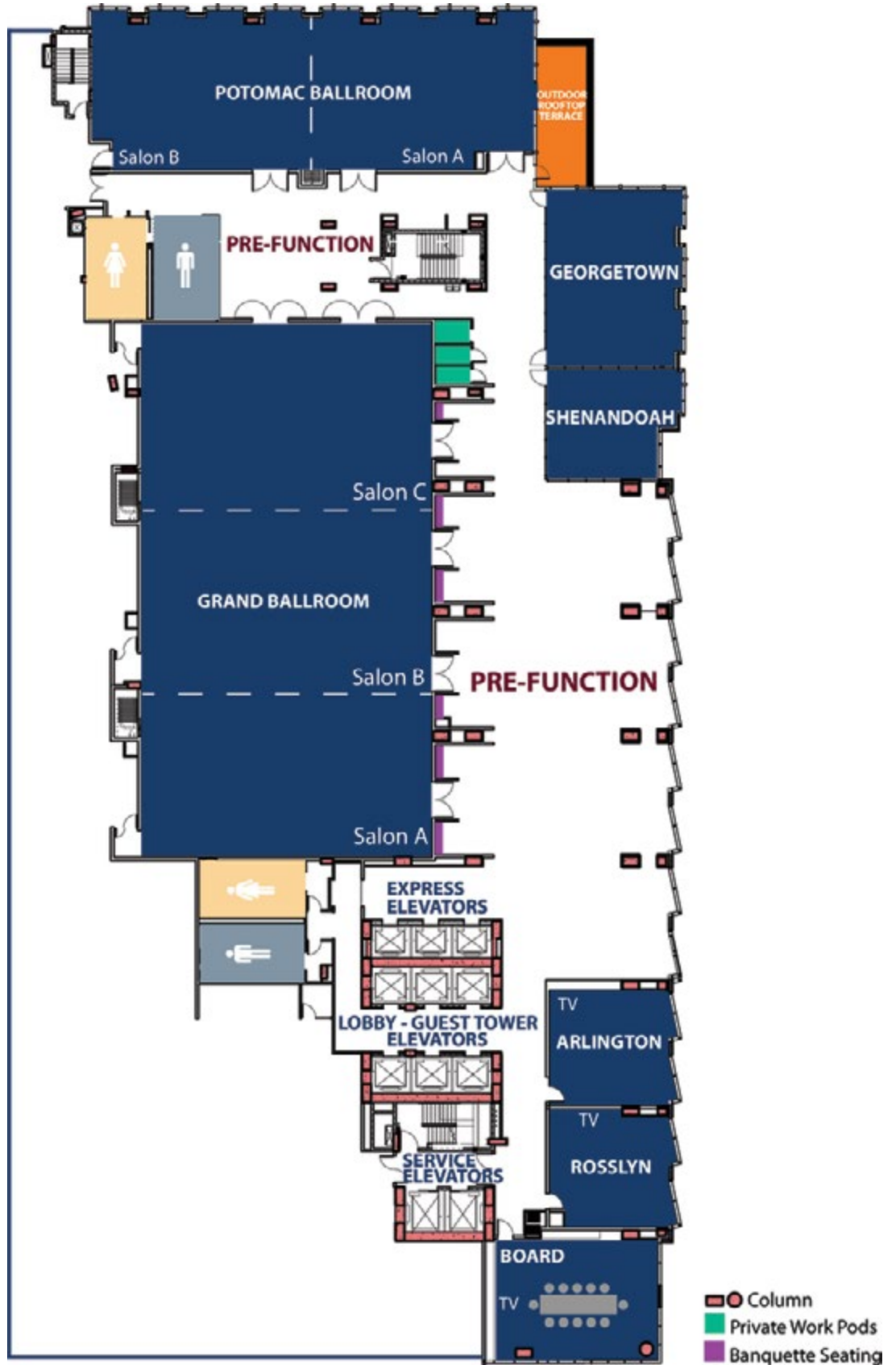
Rachel Levy, Esq.
Deloitte LLP
Washington, DC

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

1.5 Credits in Areas of Professional Practice

10:30 a.m.

Adjourn



CRAVATH

For more than two centuries, Cravath has advised clients in their most important matters.

Gibson Dunn is proud to support

NYSBA Tax Section 2026 Summer Meeting

gibsondunn.com

GIBSON DUNN

KIRKLAND & ELLIS
IS PROUD TO
SPONSOR

New York State
Bar Association
Tax Section 2026
Summer Meeting

KIRKLAND & ELLIS

www.kirkland.com

THANK YOU TO OUR SPONSORS

GOLD

CRAVATH



Davis Polk

Debevoise
& Plimpton

KIRKLAND & ELLIS



GIBSON DUNN

Proskauer»



WACHTELL, LIPTON, ROSEN & KATZ

BRONZE



The rules Keep changing. Can your tax agenda adapt?

EY Tax. From complexity to clarity.

© 2026 Ernst & Young LLP. All Rights Reserved. 15605-10004-1CS | EN-NONE



The better the prompt.
The better the answer.
The better the world works.

EY
Shape the future
with confidence



Debevoise & Plimpton is pleased to support the NYSBA Tax Section Summer Meeting

New York London Frankfurt
Washington, D.C. Paris Hong Kong
San Francisco Luxembourg Shanghai

www.debevoise.com

Proskauer >>

is proud to support **NYSBA's 2026** Tax Section Summer Meeting



Smart, sensible tax
advice for all your
business needs.

Proskauer.com
Proskauer Rose LLP | 1001 Pennsylvania Ave, N.W., Suite 600 South,
Washington, DC, 20004-2533 | 202.416.6800 | Attorney Advertising



NEW YORK STATE BAR ASSOCIATION

TAX SECTION

One Elk Street

Albany, NY 12207

518.463.3200/800.582.2452

NYSBA.ORG