

THE FIRST ANNUAL UCI- A. LAVAR TAYLOR TAX SYMPOSIUM

TAX REFORM: ONE YEAR LATER

Presented by the UCI Law Graduate Tax Program

February 11, 2019

8:00 a.m. - 5:00 p.m.

Location: UC Division of Continuing Education

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UC Irvine Program in
CORPORATE WELFARE



MESSAGE FROM THE FOUNDING TAX FACULTY

When the faculty at UCI Law decided to launch a graduate tax program, they granted us *carte blanche* to build our “dream tax program.” We seized on this rare opportunity, and created a program like no other.

We have all gained significant experience at other leading tax programs around the country, so we know what works, and what doesn’t. We also approached tax practitioners, government tax administrators, tax policy advocates, and other industry experts, and asked what they would want to see in a new tax program.

With this background, we have built a program that prioritizes student success, leaning on three pillars: mandatory in-depth doctrinal knowledge, required practical tax training, and a small student/full-time faculty ratio.

We designed a curriculum in which the first semester is comprised mostly of mandatory requirements, focusing on transactional tax courses. This structure ensures that all students gain the in-depth doctrinal knowledge needed to be a successful tax practitioner and approach the rest of the program on an even playing field. In the second semester, students gain a unique opportunity to apply their doctrinal knowledge to practical use in clinics, externships and other practical opportunities. No other graduate tax law program in the country offers a similar curriculum.

Our practical emphasis is aimed to prepare students to successfully practice tax law in a wide-variety of professional settings, both domestically and internationally. In building this new program, we have received enthusiastic feedback from potential employers, at law firms, accounting firms and government agencies, to our program’s strong emphasis on practical training. Our small size assures that students receive meaningful attention, especially from our core residential full-time tax faculty.

As scholars and former practitioners, we all share a deep passion for tax law. We will strive to impart what we have learned throughout our respective careers. We know what it takes to succeed in this field, and we are devoted to helping our students reach their goal of entering the practice of tax law. This is our dream tax program. We hope you will join us.



OMRI MARIAN
Professor of Law
UC Irvine
School of Law



VICTOR FLEISCHER
Professor of Law
UC Irvine
School of Law



JOSHUA D. BLANK
Professor of Law
UC Irvine
School of Law



NATASCHA FASTABEND
Executive Director, Graduate Tax Program
UC Irvine
School of Law

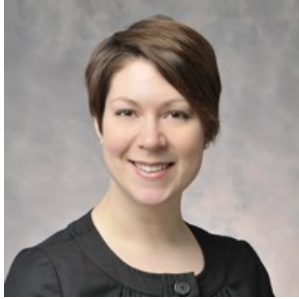


D'LOERAH HUGHES
Director of Externships
UC Irvine
School of Law

CONFERENCE SCHEDULE

8:00-8:45 a.m.	Registration and Breakfast
8:45a.m.	Welcome Bryant Garth, Vice Dean and Distinguished Professor of Law, UCI Law Omri Marian, Academic Director, Graduate Tax Program, UCI Law
9:00-10:15 a.m.	Domestic Provisions in the TCJA Moderator: Victor Fleischer, Professor of Law, UCI Law Panelists: Tony Nitti, Partner, WithumSmith+Brown David Miller, Partner, Proskauer Rose Elizabeth Crouse, Partner, K&L Gates Orla J. O'Connor, Partner, KPMG
10:15-10:30 a.m.	Morning Break
10:30-11:45 a.m.	International Provisions in the TCJA Moderator: Douglas Schaaf, Partner, Paul Hastings Panelists: John Stowel, Senior Vice President, Corporate Tax, The Walt Disney Company Edward Tarle, Vice President, Tax, Edwards Lifesciences Diana Wollman, Partner, Cleary Gottlieb Steen & Hamilton
11:45-1:00 p.m.	Lunch—Keynote Mark Prater, Managing Director, Tax Policy Services, PwC
1:00-2:15 p.m.	Tax Reporters and the TCJA Moderator: Tony Nitti, Columnist, Forbes Panelists: Stephanie Johnston, Chief Correspondent, Worldwide Tax Daily, Tax Analysts Naomi Jagoda, Reporter, The Hill Amy Rosen, Senior Tax Correspondent, Law 360
2:15-2:30 p.m.	Afternoon Break
2:30-3:45 p.m.	The TCJA and the Changing State and Local Tax Landscape Moderator: Scot Grierson, Partner, KPMG Panelists: Kirk Stark, Barrall Family Professor of Tax Law and Policy, UCLA Law School Sarah McGahan, Director, KPMG Carl Davis, Research Director, Institute on Taxation and Economic Policy Ranjana G. Madhusudhan, Chief Economist, New Jersey Department of Treasury
3:45-5:00 p.m.	The Successes and Failures of the TCJA: A Year Hindsight Moderator: Marty Sullivan, Chief Economist and Contributing Editor, Tax Analysts Panelists: Kyle Pomerleau, Director, Center for Quantitative Analysis, Tax Foundation Aparna Mathur, Resident Scholar, American Enterprise Institute Seth Hanlon, Senior Fellow, Center for American Progress Joseph Rosenberg, Senior Research Associate, Tax Policy Center
5:00-5:10 p.m.	Concluding Remarks Joshua Blank, Professor of Law, UCI Law
5:10-7:00 p.m.	Reception

FEATURED PARTICIPANTS



ELIZABETH CROUSE

K&L Gates

Elizabeth Crouse provides business-focused solutions for U.S. federal, state, and international tax problems in a variety of transactions and investment structures. She has particular experience assisting multinational businesses and investor, developer, and operator clients in the renewable energy industry, including storage and secondary market acquisitions of renewables facilities by taxable and tax-exempt organizations. Blockchain and cryptocurrency industry clients are an ever-growing part of her practice as well.

In addition, Ms. Crouse is familiar with navigating the challenges and opportunities of the U.S. federal and state renewable energy tax incentive programs (including the investment tax credit, production tax credit, and 1603 cash grant), the federal Opportunity Zones incentive, post-TEFRA partnership audit rules, and compliance with the Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS).

Ms. Crouse has been recognized as a "Rising Star" by *Super Lawyers Magazine*, 2017-2018.



CARL DAVIS

*Institute on Taxation and
Economic Policy*

Carl Davis is the research director at the Institute on Taxation and Economic Policy (ITEP), where he has worked for over a decade. Carl works on a wide range of issues related to both state and federal tax policy, as well as the areas where they intersect. Recent areas of focus include transportation funding, education tax credits, and emerging issues such as the taxation of the gig economy and e-commerce. He is also frequently involved in the Institute's tax distributional analyses, which are performed using the ITEP Microsimulation Tax Model. Carl has advised policymakers, researchers, and advocates on tax policy issues at the federal level and in nearly every state and his work is frequently cited in major media outlets.



SCOT GRIERSON

KPMG

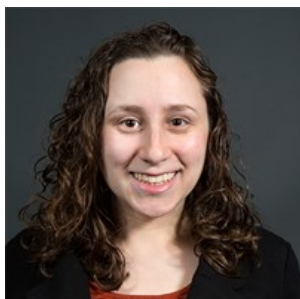
Scot Grierson is a Tax partner with over 20 years of experience in State and Local tax and leads KPMG's Pacific Southwest SALT practice. Prior to joining KPMG, Scot held roles in Big Four accounting and private law practice. He is a member of Advisory Board of the California Taxpayer Association, and a frequent speaker at tax industry conferences.



SETH HANLON

Center for American Progress

Seth Hanlon is a senior fellow at American Progress, where he focuses on federal tax and budget policy. Prior to rejoining American Progress, he served as special assistant to the president for economic policy at the White House National Economic Council, where he coordinated the Obama administration's tax policy. He has also served as tax counsel for the House Budget Committee Democratic staff and for Sen. Debbie Stabenow (D-MI), a senior Finance Committee member, among other Capitol Hill roles. He was the Director of Fiscal Reform during a prior stint at American Progress and an associate attorney at Caplin & Drysdale, Chartered. He received his J.D. from Yale Law School.



NAOMI JAGODA

The Hill

Naomi Jagoda is a staff writer for The Hill, where she writes about tax policy, including the 2017 tax law. Prior to joining The Hill in 2015, Jagoda was a tax reporter at The Bond Buyer, a news outlet focused on the municipal bond market. She has also worked at The Washington Examiner and has interned at USA Today, the Philadelphia Daily News and the Chattanooga (Tenn.) Times Free Press. Jagoda has a bachelor's degree from the University of Pennsylvania.



STEPHANIE JOHNSTON

Worldwide Tax Daily

Stephanie Soong Johnston is chief correspondent for Worldwide Tax Daily, a Tax Analysts publication. She is a Canadian national who earned her bachelor's degree in English literature at the University of California, Irvine, and her master of science in journalism degree at Northwestern University. Before joining Tax Analysts, Stephanie worked at Entrepreneur magazine, Sunset magazine, Agence France-Presse, and various lifestyle and business trade publications, including a fashion magazine. She regularly covers international tax, and her primary areas of focus include the OECD and the G-20, the U.K., Canada, Ireland, Scandinavia, and, lately, the taxation of the digital economy debate.



**RANJANA G.
MADHUSUDHAN**

*New Jersey Department of
Treasury*

Dr. Ranjana G. Madhusudhan is the Chief Economist at the New Jersey Department of Treasury, Office of Revenue & Economic Analysis. She specializes in tax policy, tax administration, revenue forecasting and economic analysis. She is a past President of the National Tax Association (NTA) and launched a successful on-going collaborative initiative jointly with the Federation of Tax Administrators (FTA) and NTA, which has focused on critical fiscal policy issues facing federal, state and local governments. She has participated in various tax policy panels both in the United States and Tax Policy Workshops in Europe. She served on the editorial board of Public Budgeting & Finance and was a member of the GASB Fiscal Sustainability Task Force on Economic Conditions Reporting. Currently, Dr. Madhusudhan serves as member of the Governing Board for The New Jersey Integrated Population Health Data (iPHD) Project and the State Sales & Use Tax Review Commission as the State Treasurer's designee. She received her Ph.D. in economics from the Maxwell School of Citizenship and Public Affairs, Syracuse University.



APARNA MATHUR

American Enterprise Institute

Aparna Mathur is a resident scholar in economic policy studies at the American Enterprise Institute, where she researches income inequality and mobility, tax policy, labor markets, and small businesses. Dr. Mathur directs the AEI-Brookings Project on Paid Family and Medical Leave, for which she was recognized in the 2017 Politico 50 list. She has been published in several top scholarly journals, testified before Congress, and published numerous articles in the popular press on issues of policy relevance. Her work has been cited in academic journals and leading newsmagazines. Government organizations such as the Congressional Research Service and the Congressional Budget Office have also cited her work in their reports to Congress. She has been an adjunct professor at Georgetown University's School of Public Policy and has taught economics at the University of Maryland. She holds a Ph.D. and an M.A. in economics from the University of Maryland, College Park, an M.A. in economics from the Delhi School of Economics, and a B.A. from Hindu College at Delhi University in India.



SARAH MCGAHAN

KPMG

Sarah McGahan is a member of the firm's Washington National Tax Practice, State and Local Tax (SALT). At Washington National Tax, she is primarily responsible for tracking legislation and judicial developments to keep clients and KPMG professionals informed of important state tax changes. Ms. McGahan also provides guidance and counsel to clients in connection with proposed and recently enacted tax legislation and assists clients with multi-state issues involving corporate income/franchise taxes and sales and use taxes.

Ms. McGahan has written numerous articles for tax publications, including the Journal of Multistate Taxation, the State and Local Tax Advisor, and State Tax Notes. In addition, she has spoken extensively throughout the country on state and local tax matters.



DAVID MILLER

Proskauer

David Miller is a tax partner at Proskauer. He is a former chair of the tax section of the New York State Bar Association, and teaches tax policy at NYU law school.



TONY NITTI

RubinBrown LLP

Tony Nitti is a tax partner based in RubinBrown's Aspen, Colorado office and a licensed CPA in the states of New Jersey and Colorado. He has twenty years of accounting and tax experience, including working in the tax departments of Arthur Andersen LLP, Price Waterhouse LLP, and Withum. Tony's practice focuses primarily on corporate and partnership tax planning, with a special focus on the consolidated return regulations and the reorganization provisions, including the structuring of acquisitions, mergers, reorganizations, spin-offs and other restructuring transactions. Tony is the author of numerous articles for The Tax Adviser, most recently *Understanding the New Section 199(a) Business Income Deduction* featured in the April 2018 Issue. He co-authored the CCH expert tax treatise: Corporations Filing Consolidated Returns, and since 2012 has been a featured tax writer for Forbes. His Forbes.com blog *Taxes: The Nitti Gitty* has a national following in the hundreds of thousands. His opinions and commentary on important tax issues have been quoted in Bloomberg, CNN Money, and the Wall Street Journal.



ORLA O'CONNOR

KPMG

Orla O'Connor is a Tax principal based in the San Francisco office providing tax consulting and compliance services to asset management clients, with a specialization in Patient Capital/Evergreen Structures, Impact Investing, Cross-border Structures, and the Real Estate Industry.

Before joining KPMG, Orla most recently served as legal counsel in the Washington, DC office of Goodwin Procter, where she advised real estate and private equity clients on transactions, private letter rulings, and tax policy matters.



KYLE POMERLEAU

*Center for Quantitative Analysis,
Tax Foundation*

Kyle Pomerleau is Economist and Director, Center for Quantitative Analysis at the Tax Foundation. In his current position he leads the tax modeling team, oversees the center's research, and researches and writes on a variety of federal tax issues. His work has been cited in most major media outlets throughout the country. Kyle is originally from Maine and holds an MPP from the McCourt School of Public Policy at Georgetown University.



MARK PRATER

Tax Policy Services, PwC

Mark Prater serves as a Managing Director in PwC's Tax Policy Services Practice in Washington, DC. In his role, Mark advises clients with respect to tax policy issues and tax legislation with a concentration on the Tax Cuts and Jobs Act of 2017.

Mark Prater graduated from Portland State University in 1981 with a B.S. in accounting. In the summer after finishing at Portland State, Mark worked on a governmental audit under the direction of a team from Coopers and Lybrand. He obtained a J.D. from Willamette University in 1984 and an LL.M. in Taxation from the University of Florida in 1987. Mark became a member of the Oregon and Washington State bars in 1984 and a certified public accountant in Washington in 1986. He practiced with Touche Ross from 1984 to 1986 and a Portland law firm, Dunn, Carney et al. from 1987 to 1990. From January 1990 through November 1993, Mark served as a tax counsel on the Republican staff of the U.S. Senate Finance Committee. In November 1993, Mark was promoted to Chief Tax Counsel on the Republican staff of the Senate Finance Committee and in January 2007, added the role of Deputy Staff Director of the Republican staff.



AMY LEE ROSEN

Law360

Amy Lee Rosen is a Senior Tax Correspondent for Law360 where she writes news and feature articles on federal, international and state and local tax issues. Before working at Law360 Amy served as a Corporate Governance Analyst at CQ Roll Call in Washington DC where her stories were posted on Westlaw's Practitioner Insights section. She is barred in Pennsylvania and New Jersey and graduated from Temple University's Beasley School of Law in Philadelphia. While in law school Amy published law review articles spanning from Chinese contract law to trolling copyright lawsuits filed by pornography companies. In her spare time Amy enjoys running, lifting, cooking, eating, and traveling. Please follow her on Twitter @amyleerosen and feel free to reach out to her to talk about tax policy.



JOSEPH ROSENBERG

Tax Policy Center

Joseph Rosenberg is a senior research associate in the Urban-Brookings Tax Policy Center at the Urban Institute, where his research focuses primarily on issues of federal taxation, including business and corporate taxation, broad-based consumption taxes, tax expenditures, and tax incentives for charitable giving. He also develops and maintains the Tax Policy Center's microsimulation model of the federal tax system, which is regularly used to produce analyses of the revenue and distributional impacts of federal tax policy that are broadly cited by policy-makers and the press. Before joining Urban, Rosenberg worked at the Board of Governors of the Federal Reserve System in Washington, DC, and was a PhD candidate in economics at the University of California, Berkeley.



DOUGLAS SCHAAF

Paul Hastings

Douglas Schaaf is a partner and former Chair of the Global Tax Practice of Paul Hastings and is based in the firm's Orange County office. He provides tax and business advice relating to complex business transactions and issuance of financial instruments.

Much of his practice involves providing tax advice in cross-border transactions; acquisitions and recapitalizations of corporations; partnership formation and restructuring matters; tax advice concerning the acquisition and disposition of real estate; tax controversy matters at both the state and federal level; and tax aspects of executive compensation arrangements. He has more than 30 years of experience in a broad range of tax matters.



KIRK STARK

UCLA School of Law

Kirk Stark is the Barrall Family Professor of Tax Law and Policy at the UCLA School of Law. Professor Stark's research focuses on taxation and public finance, with an emphasis on state and local tax policy and U.S. fiscal federalism. His work has examined fiscal disparities among the states, the federal government's role in state tax reform, and the question of how best to allocate fiscal responsibilities among federal, state and local governments. Most recently, Stark authored two widely-cited papers concerning the federal income tax treatment of state charitable tax credits, a topic of some interest to federal, state, and local lawmakers following the enactment of the Tax Cuts and Jobs Act of 2017. Professor Stark regularly testifies on state and local tax policy before the California state legislature and has consulted extensively with state and local governments in formulating responses to recent federal tax changes. Stark has also served on the Board of Directors of the National Tax Association, a nonpartisan organization founded in 1907 to promote the study of tax policy and public finance.



JOHN STOWEL

The Walt Disney Company

John Stowel has led the global tax function at three different Fortune 500 companies (both US and non-US based) for the past 15 years, including at The Walt Disney Company for the past 6 years. Prior to that he held various tax positions based in the United States, Switzerland, and his native New Zealand, including over 10 years in international tax with Deloitte & Touche. He has a LLM (Taxation) with Distinction from Georgetown University Law Center, and an LL.B and a B. Com from the University of Canterbury. He is a Chartered Accountant (Australia and New Zealand), CPA (California), and an inactive Barrister & Solicitor of the High Court of New Zealand. He is a board member of The Tax Council, Tax Council Policy Institute, CalTax and the Californian Chamber of Commerce.



MARTY SULLIVAN

Tax Analysts

Martin A. Sullivan is Chief Economist and Contributing Editor at Tax Analysts, the non-profit publisher of *Tax Notes*, *State Tax Notes* and *Tax Notes International*. Marty testifies regularly before Congress, appears on national TV and radio, and is often quoted in leading newspapers and magazines. Previously, he was an economist at the U.S. Treasury Department, the congressional Joint Committee on Taxation, and a major accounting firm. He earned his B.A. at Harvard University and his Ph.D. at Northwestern University.



EDWARD TARLE

Edwards Lifesciences

Edward A. Tarle was appointed Vice President, Tax of Edwards Lifesciences Corporation ("Edwards") when Edwards was spun-off from Baxter International Inc. and began operating as an independent publicly traded company in April 2000. Edwards Lifesciences, based in Irvine, California, is the global leader in patient-focused medical innovations for structural heart disease, as well as critical care and surgical monitoring. Driven by a passion to help patients, the company collaborates with the world's leading clinicians and researchers to address unmet healthcare needs, working to improve patient outcomes and enhance lives.



DIANA WOLLMAN

Cleary Gottlieb

Diana Wollman joined Cleary Gottlieb in 2015 after serving as the Internal Revenue Service's first Director of International Strategy for the agency's Large Business & International Division, where she was responsible for developing and managing its international strategic program. Her work included improving how the IRS identifies and addresses significant international tax issues, manages and utilizes its institutional knowledge and data, and trains agents; she also worked to improve the collaboration and coordination between the audit division and the Office of Chief Counsel. She represented the IRS on several Organisation for Economic Co-operation and Development (OECD) working groups, including those focused on BEPS (the OECD's base erosion and profit shifting project), the Forum on Harmful Tax Practices and the Forum on Tax Administration.

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UCI Program in Corporate Welfare Studies



The Program in Corporate Welfare Studies at UC Irvine conducts research on the causes and consequences of governmental policies that aim to benefit particular firms.



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<https://www.law.uci.edu/gradtax/>

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FIRM PARTNERS:

JONATHAN T. AMITRANO

A. LAVAR TAYLOR

LISA O. NELSON

The Law Offices of A. Lavar Taylor LLP specialize in handling civil and criminal tax controversies, involving the IRS, the Department of Justice, and state tax agencies such as the Franchise Tax Board, California Department of Tax and Fee Administration (formerly State Board of Equalization), and the Employment Development Department.

The firm's practice includes representation of business and individual taxpayers during civil audits, criminal investigations, administrative appeals, all phases of collection, and judicial proceedings in all trial and appellate courts. The firm also provides advice regarding tax-related issues in bankruptcy and receivership proceedings and counsels clients on the use of the bankruptcy laws to facilitate the handling of existing and potential tax problems. We are pleased to offer professionals who can converse in English, Spanish, and Chinese.

Our attorneys are recognized both statewide and nationally for their expertise.



For more information visit taylorlaw.com or phone us at (714) 546-0445.