

52nd Annual

BANK & CAPITAL MARKETS TAX INSTITUTE

NOVEMBER 1-3, 2017 | HILTON ORLANDO LAKE BUENA VISTA

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Meet Our Expert Speakers

See page 6 for the complete speaker listing

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2017 Keynote Speakers:



Keynote: The Economy in 2018
JAMES CHESSEN
Executive Vice President & Chief Economist
AMERICAN BANKERS ASSOCIATION



Keynote: Legislative & Tax Reform Update
PAM OLSON
Washington National Tax Services Leader & U.S. Deputy Tax Leader
PRICEWATERHOUSECOOPERS LLP



Keynote: Banking Industry - Past, Present and Future
THOMAS BROWN
Founder & CEO
SECOND CURVE CAPITAL

▶ Letter from the Chairman

Dear Colleague,

For the past 51 years, the annual Bank and Capital Markets Tax Institute (BTI) has provided bank and tax professionals from financial institutions and accounting firms in-depth analysis and practical solutions to the most pressing issues facing your industry. Now in its 52nd year, BTI 2017 will continue to provide attendees with unmatched tools and resources to ensure that you continue to remain up to date and ahead of the game.

Our expert advisory board has assembled a dynamic and interactive agenda making BTI 2017 the only choice for bank tax professionals. This year's agenda includes the return of three popular preconference sessions:

- Community Bank Tax Workshop
- Bank Tax Tutorial
- Capital Markets Workshop

Technical updates will be provided on topics including IRS Developments, M&A, FSI-Tax Developments, and Compensation & Fringe Benefits. New sessions this year include, Planning for Efficiency and Effectiveness in the Stress Testing Process and Captive Insurance Update.

Register before September 29th and Save \$300 off standard rates with this Exclusive Offer PLUS earn up to 24 CPE credits*

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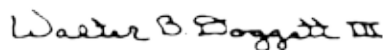
3 Easy Ways to Register

O: banktaxinstitute.com | T: 212-457-9618
 E: Robert Bushover at rbushover@alm.com

It is no secret that the tax landscape is continually changing; you need to know how these changes affect your organization and identify the most efficient and effective plan of action. BTI 2017 is the must attend event for all forward-thinking tax professionals.

I look forward to seeing you in Orlando on November 1-3, 2017!

Sincerely,



WALTER B. DOGGETT III

VP of Tax - E*TRADE Financial Corporation

2017 BANK AND CAPITAL MARKETS TAX INSTITUTE CHAIRMAN

▶ Agenda at a Glance

Wednesday, 11/1

8:00-5:00	Registration Open		
8:00-9:00	Continental Breakfast		
8:30-5:00	Full Day Workshops		
	Community Bank Tax Workshop	Bank Tax Tutorial	
12:00-1:00	Lunch (Provided for All Workshop Participants)		
1:00-5:00	Capital Markets Workshop		
3:15-3:45	Mid Afternoon Stretch		
5:00-6:30	Welcome Cocktail Reception		

Thursday, 11/2

7:00-5:00	Registration Open		
7:00-8:00	Networking Breakfast		
8:00-9:15	Morning Keynote Address		
9:15-10:30	General Banking Update		
10:30-11:00	Mid Morning Break		
11:00-12:15	IRS Developments		
12:15-1:45	Award Presentation followed by Luncheon Keynote Address		
1:45-3:15	Breakout Sessions		
	Community Banking Update	FSI-Recent Tax Developments	Comp & Fringe Benefits Update
3:15-3:45	Mid Afternoon Stretch		
3:45-5:15	Breakout Sessions		
	S Corp Update	Planning for Efficiency and Effectiveness in the Stress Testing Process	Captive Insurance Update
5:15-6:15	Networking Cocktail Reception		

Friday, 11/3

7:00-12:30	Registration Open		
7:00 - 8:00	Continental Breakfast		
7:30-8:45	Morning Keynote Address		
8:45-10:00	Tax Reform Implications		
10:00-10:30	Mid Morning Break		
10:30-12:00	Breakout Sessions		
	Tax Accounting Update	Bank M&A Tax Considerations: Opportunities & Hazards Ahead	IRS Practice & Procedure Update
12:00-1:00	Networking Lunch		
1:00-2:30	Breakout Sessions		
	SALT Update	Tax Process Automation	

► Conference Workshops

NOVEMBER 1, 2017

REGISTRATION | 8:00 am–5:00 pm

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CONTINENTAL BREAKFAST | 8:00 am–9:00 am

22ND ANNUAL COMMUNITY BANK TAX WORKSHOP | FULL-DAY WORKSHOP OPTION A | 8:30 am–5:00 pm

The Community Bank Tax Workshop is the banking industry's annual advanced tax conference focused specifically on tax planning and compliance by community banks, both C corporations and S corporations. The workshop is designed for the financial executives of community banks and bank holding companies, and their outside accountants and counsel. We will discuss a number of new "Schedule M-3" entries caused by changes in accounting methods that are not followed for tax purposes. Additionally, we will dive into the experience with LB&I directive to examiners regarding the examination of bad debts. We are seeing a recovery in community bank acquisition activity, but with a couple of "twists;" the acquirers are other community banks, not the large banks with experience as an acquirer, and many of the acquisitions are complicated by net operating loss carryforwards. It appears that we may not have enacted "tax reform," but there is enough activity to have a lively discussion of how tax legislation is likely to affect banking.

JOHN E. CEDERBERG, CPA; **RANDY CHURCHILL**, CPA, Director, **MOSS ADAMS**; **PAUL A. SIREK**, CPA, Partner, **EIDE BAILLY LLP**
JUSTIN HORST, Chief Financial Officer, **PINNACLE BANCORP, INC.**

BANK TAX TUTORIAL | FULL-DAY WORKSHOP OPTION B | 8:30 am–5:00 pm

As most of the presentations at the conference will focus on specific technical issues, you will want to take advantage of our preparatory Bank Tax Tutorial. The Bank Tax Tutorial is designed for comptrollers, tax professionals and their outside advisors, and prepares you to follow the conference presentations with a greater understanding of the complexity of these issues. If you have not had a refresher course in some time, if you want a succinct and inclusive review, or if you just want to fill in gaps in your background, plan now to attend this special seven-hour tutorial. In this session, we will discuss the common schedule M adjustments specific to banking, the bad debt conformity election (including the recent IRS audit directive on bad debt conformity), and developments in the tax issues associated with loan foreclosures and holding foreclosed property.

DAVID A. THORNTON, Partner, **CROWE HORWATH LLP**; **TRUDIE D. KANTER**, Senior Manager, **CROWE HORWATH LLP**
PATRICK EGAN, Senior Vice President, Corporate Tax, **NEW YORK COMMUNITY BANCORP**

LUNCH | 12:00 pm–1:00 pm | Sponsored by:

CAPITAL MARKETS WORKSHOP | HALF-DAY WORKSHOP OPTION C | 1:00 pm–5:00 pm | Sponsored by:

Banks continue to play a critical role in today's capital markets, and changes to the regulatory and economic landscape have created new challenges and opportunities from a tax perspective. In recent years, the derivatives used and offered by banks of all sizes have evolved and become more complex; the tax rules have not evolved at the same pace. This workshop will review the tax considerations related to a bank's derivative transactions, as well as address certain non-tax issues such as the financial accounting implications and business reasons for using or offering these products at banks of various sizes. Further, while the markets have increased in complexity, banks are facing other pressures as a result of regulatory reform, including more stringent capital and liquidity requirements. As a result, many institutions are divesting of asset classes that were historically fundamental to the banking industry, such as commercial loan portfolios and mortgage servicing rights.

In response, non-banking institutions have entered the markets to fill the demand. This workshop will address various tax considerations for acquiring and selling loan portfolios and mortgage servicing rights. We will also highlight some of the regulatory implications for these transactions and how the transactions are reflected in the parties' financial statements.

MARK PRICE, Principal, Financial Institutions and Products, **KPMG LLP**

MID-AFTERNOON STRETCH | 3:15 pm–3:45 pm

WELCOME COCKTAIL RECEPTION | 5:00 pm–6:30 pm | Sponsored by: Crowe Horwath.

► Agenda | November 2

7:00 am–5:00 am Registration

Sponsored by:



7:00 am–8:00 am Networking Breakfast

Sponsored by:



8:00 am–9:15 am MORNING KEYNOTE

JAMES CHESSEN, Executive Vice President and Chief Economist, **AMERICAN BANKERS ASSOCIATION**

9:15 am–10:30 am GENERAL BANKING UPDATE

This session will provide attendees with an overview of federal income tax and accounting developments of significant interest to banks and practitioners. Topics to be discussed include an analysis and review of recent and proposed tax legislation, including tax reform proposals, a summary of recent IRS pronouncements and cases, recent accounting and regulatory guidance, and a review of current IRS examination issues.

CLARK WULF, Executive Vice President, Corporate Tax Director, **KEYCORP**; **JOHN KINSELLA**, Vice President, Tax Policy, **AMERICAN BANKERS ASSOCIATION**
ELIZABETH L'HOMMEDIEU, Principal, Financial Institutions and Products, **KPMG LLP**; **ANTHONY WELBURN**, Partner, **KPMG LLP**

10:30 am–11:00 am Mid-Morning Break

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11:00 am–12:15 pm IRS DEVELOPMENTS

Led by representatives from industry and public accounting, as well as former IRS executives, this panel will discuss the taxpayer and government positions on current issues being raised by the IRS for examination. The panel will feature a lively discussion of IRS positions affecting current examination issues as well as strategic initiatives and structural changes within the IRS that will impact taxpayers.

JAMES AHERN, Senior Vice President & Capital Markets Tax Director, **SYNCHRONY FINANCIAL**; **PAUL DENARD**, Managing Director, **PRICEWATERHOUSECOOPERS LLP**
ELLEN ROTENBERG, Partner, **PRICEWATERHOUSECOOPERS LLP**; **DENISE SCHWIEGER**, Principal, **PRICEWATERHOUSECOOPERS LLP**

12:15 pm–1:45 pm AWARD PRESENTATION FOLLOWED BY LUNCHEON KEYNOTE

PAM OLSEN, US Deputy Tax Leader & Washington National Tax Services Leader, **PRICEWATERHOUSECOOPERS LLP**

1:45 pm–3:15 pm BREAKOUT SESSIONS

TRACK A

Community Banking Update

This session will provide an overview of federal income tax issues and recent developments of significant interest to small and mid-sized banks. Topics to be discussed include an update on recent IRS pronouncements and initiatives impacting community banks, an overview of proposed federal tax legislation and suggested tax planning strategies to capitalize on a potential reduction in the federal corporate income tax rate. All topics will be presented from a community banking perspective by practitioners who serve this market extensively.

COLLEEN DELGER, Vice President, **BANNER BANK**
DAVID A. THORNTON, Partner, **CROWE HORWATH LLP**
JAMES D. GOELLER, Partner, **CROWE HORWATH LLP**
LANCE DAVIS, Partner, **BKD LLP**

TRACK B

FSI - Recent Tax Developments

This session will discuss recent tax developments to the financial services industry and international arena.

KEITH ANZEL, Managing Director and Chief Tax Officer, **CITIGROUP GLOBAL MARKETS INC.**
JACK BURNS, Executive Director, Financial Services Tax Practice, **EY LLP**

TRACK C

Comp & Fringe Benefits Update

The session will address a variety of compensation-related topics including, for example, approaches to providing equity compensation and tax considerations, impact of IRC section 409A on equity and deferred compensation and issues we have seen in practice, IRC section 280G and 162(m) considerations, tax reporting/withholding matters and fringe benefits.

RON COPHER, CFO, **GLACIER BANCORP, INC.**
STEVE LEVIN, Senior Director, Washington National Tax, **RSM LLP**
BILL O'MALLEY, Senior Director, Washington National Tax, **RSM LLP**

3:15 pm–3:45 pm Mid-Afternoon Stretch

Sponsored by:



3:45 pm–5:15 pm BREAKOUT SESSIONS

TRACK A

S Corp Update

The pass-through structure of a Sub S bank poses many unique challenges and opportunities. In this session, we will explore the advantages and disadvantages of being a Sub S bank. What impact will tax reform have on Sub S bank shareholders? Will it still make sense to be a Sub S bank? We will examine the impact of new legislation, discuss select merger and acquisition concepts, present tax planning strategies, and review other currently relevant tax issues.

JEREMY UHL, Vice President of Finance, **SECURITY NATIONAL BANK**
FRANCIS GODFREY, Partner, **BKD, LLP**
AARON WIEGERT, **BKD, LLP**

TRACK B

Planning for Efficiency and Effectiveness in the Stress Testing Process

Challenges persist as banks strive to meet supervisory expectations for sound risk and capital management practices, and the tax department frequently lands in the center of the storm. Hear tactical methodologies and leading practices to better plan for your bank's capital management and stress testing process. Presenters will discuss what you should be doing now regarding documentation, processes, controls and model validation to meet and thrive in today's dynamic environment.

CLARK WULF, Executive Vice President, Corporate Tax Director, **KEYCORP**
JARED FORMAN, Principal, **DHG LLP**
DAVID HENDERSON, Partner, **DHG LLP**
HEATHER WALLACE, Partner, **DHG LLP**

TRACK C

Captive Insurance Update

This session will cover the basic structure of captive insurance companies, their federal income tax treatment and recent legislation and IRS initiatives aimed at the captive insurance industry. Topics will include an overview of the PATH Act enhancement to the small captive insurance company premium exemption and the status of the IRS information gathering and reporting requirement set forth in IRS Notice 2016-66.

BRETT SCRIBNER, Senior Vice President, Director of Tax, **U.S. BANCORP**
LYNN MCGUIRE, Partner, **CROWE HORWATH LLP**


5:15 pm–6:15 pm Networking Cocktail Reception

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► Agenda | November 3

7:00 am–12:30 am Registration

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7:00 am–8:00 am Continental Breakfast


Sponsored by: 

7:30 am–8:45 am **MORNING KEYNOTE**
TOM BROWN, Founder & CEO, **SECOND CURVE CAPITAL**

8:45 am–10:00 am **TAX REFORM IMPLICATIONS**
 The 2016 elections generated a renewed focus on comprehensive tax reform, but, as 2017 has already demonstrated, achieving this goal is very challenging. This panel will discuss the latest federal tax legislative developments, focusing on the key proposals for the banking industry. The panel will also discuss how these proposals could affect the industry and what banks should be doing now.

RON COPHER, CFO, **GLACIER BANCORP, INC.**; **BILL REILLY**, National Tax Industry Lead Partner for Banking, **GRANT THORNTON LLP**; **BRIAN DAVEY**, Tax Managing Director, **GRANT THORNTON LLP**; **JOHN GIMIGLIANO**, Principal, **KPMG LLP**; **MATT MOSBY**, Senior Manager, **KPMG LLP**

10:00 am–10:30 am Mid-Morning Break

Sponsored by: 

10:30 am–12:00 pm **BREAKOUT SESSIONS**

TRACK A

Tax Accounting Update

In this session, our panelists will update you on the latest developments in Accounting for Income Taxes, including discussions of the upcoming revenue recognition and leasing standards, and tax accounting for international operations. There will be valuable insights for community banks as well as large multinational financial institutions.

BRETT SCRIBNER, Senior Vice President, Director of Tax, **U.S. BANCORP**
RANDY CHURCHILL, Director, **MOSS ADAMS LLP**
KRISTINE HOEFLIN, Partner, **MOSS ADAMS LLP**
SARAH (SALLIE) NOLD, Director, **PRICEWATERHOUSECOOPERS LLP**
DENISE SCHWIEGER, Principal, **PRICEWATERHOUSECOOPERS LLP**

TRACK B

Bank M&A Tax Considerations: Opportunities & Hazards Ahead

As consolidation and M&A activity continue at a rapid pace, bankers are looking ahead to build a competitive edge and a strong business. In this session, panelists will discuss accounting methods in M&A situations, transaction cost studies/280G issues, and tax accounting highlights. Hear observations, items commonly missed, and strategies to overcome challenges that your bank can act on now.

JAMES AHERN, Tax Director-Capital Markets, **SYNCHRONY FINANCIAL**
NATHAN CLARK, Partner, **DHG, LLP**
JOSHUA ELLIOTT, Partner, **DHG, LLP**
NIKKI YARBOROUGH, Partner, **DHG, LLP**

TRACK C

IRS Practice and Procedure Update

This panel will discuss the taxpayer and government positions on current issues being raised by the IRS for examination. The panel will feature a lively discussion of IRS positions affecting current examination issues as well as strategic initiatives and structural changes within the IRS that will impact taxpayers.

DEAN FISCHBECK, Senior Vice President, Tax Audit and Controversy Executive, **BANK OF AMERICA**
SUSANNE MULLER, Executive Director, **UBS**
JOHN KEENAN, Director, **DELOITTE**

12:00 pm–1:00 pm NETWORKING LUNCH

1:00 pm–2:30 pm **BREAKOUT SESSIONS**

TRACK A

SALT Update

New partnership audit rules, effective in 2018 without The State and Local Tax session will be an interactive panel discussion covering the latest developments in state and local taxation of financial institutions. Topics will include a review of the "State of the States," an update on significant new and pending legislation, thoughts on the recent trend toward market-based sourcing, recent judicial and administrative rulings, and other state/local developments and trends that are impacting the industry and your state effective tax rate.

WALTER DOGGETT III, Vice Present of Tax, **E*TRADE FINANCIAL CORPORATION**; **MATHEW DIDONATO**, Northeast Regional Lead Partner, **GRANT THORNTON LLP**
ANN KAMASKY, Partner, **DELOITTE**

TRACK B

Tax Process Automation

Technology continues to change at a rapid pace - the iPhone is only 10yrs old! Tax is not immune and a new wave of technologies can provide significant automation and risk management benefits for tax processes from planning, to controversy, accounting, compliance and regulatory reporting. Please join us in this session as we discuss the new wave of intelligent automation (including robotics process automation) and the potential benefits within your tax department.

ADRIAN FENTON, U.S. Tax Services Director, Asset Servicing, **BANK OF NEW YORK MELLON**
CHRISTOPHER DOBSON, Partner/Principal, **EY LLP**

NOTE: Agenda and speakers subject to change without notice

EARN UP TO 24 CPE CREDITS in Taxes during the 2017 Bank and Capital Markets Tax Institute. All attendees, speakers and sponsors interested in CPE credits must request credits when initially registering for the conference. Please contact Michelle Miura at 212-457-9649 or mmiura@alm.com with any questions concerning CPE credits.

CPE CREDITS

Bank Tax Institute Conference	14.5	Conference Plus Full-Day Workshop	24
One Full-Day Workshop	9	Conference Plus Half-Day Workshop	19.5
One Half-Day Workshop	4.5		

► 2017 Speakers**JAMES AHERN**

Senior Vice President & Capital Markets
Tax Director
SYNCHRONY FINANCIAL

KEITH ANZEL

Managing Director and Chief Tax Officer
CITIGROUP GLOBAL MARKETS INC.

THOMAS BROWN

Founder & CEO
SECOND CURVE CAPITAL LLC

JACK BURNS

Executive Director
EY LLP

JOHN CEDERBERG

CPA
JOHN E. CEDERBERG, CPA

JAMES CHESSEN

Executive Vice President and Chief
Economist
AMERICAN BANKERS ASSOCIATION

RANDY CHURCHILL

Director
MOSS ADAMS LLP

NATHAN CLARK

Partner
DHG LLP

RON COPHER

CFO
GLACIER BANCORP, INC.

BRIAN DAVEY

Tax Director, Federal Tax, Financial
Services
GRANT THORNTON LLP

LANCE DAVIS

Partner
BKD LLP

COLLEEN DELGER

Vice President, Tax Manager
BANNER BANK

PAUL DENARD

Managing Director
PRICEWATERHOUSECOOPERS LLP

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E*TRADE FINANCIAL CORPORATION

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Partner
DHG LLP

PATRICK EGAN

Senior Vice President, Corporate Tax
NEW YORK COMMUNITY BANCORP

ADRIAN FENTON

U.S. Tax Services Director, Asset
Servicing
BANK OF NEW YORK MELLON

DEAN FISCHBECK

Senior Vice President
BANK OF AMERICA

JARED FORMAN

Principal
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DAVID HENDERSON

Partner
DHG LLP

KRISTINE HOEFLIN

Partner
MOSS ADAMS LLP

JUSTIN HORST

Chief Financial Officer
PINNACLE BANCORP INC.

ANN KAMASKY

Partner
DELOITTE

TRUDIE D. KANTER

Senior Manager
CROWE HORWATH LLP

JOHN KEENAN

Director
DELOITTE

JOHN KINSELLA

Vice President, Tax Policy
AMERICAN BANKERS ASSOCIATION

STEVE LEVIN

Senior Director
RSM LLP

ELIZABETH L'HOMMEDIEU

Principal, Financial Institutions and
Products
KPMG LLP

LYNN MCGUIRE

Partner
CROWE HORWATH LLP

MATT MOSBY

Senior Manager
KPMG LLP

SUSANNE MULLER

Executive Director
UBS

SARAH NOLD

Director
PRICEWATERHOUSECOOPERS LLP

PAMELA OLSON

Deputy Tax Leader
PRICEWATERHOUSECOOPERS LLP

BILL O'MALLEY

Senior Director
RSM LLP

MARK PRICE

Principal
KPMG LLP

BILL REILLY

Partner
GRANT THORNTON LLP

ELLEN ROTENBERG

Partner
PRICEWATERHOUSECOOPERS LLP

DENISE SCHWIEGER

Principal
PRICEWATERHOUSECOOPERS LLP

BRETT SCRIBNER

Senior Vice President, Director of Tax
U.S. BANCORP

PAUL A. SIREK

Partner
FINANCIAL INSTITUTIONS GROUP

DAVID THORNTON

Partner
CROWE HORWATH LLP

JEREMY UHL

Vice President of Finance
SECURITY NATIONAL BANK

HEATHER WALLACE

Partner
DHG LLP

ANTHONY WELBURN

Partner
KPMG LLP

AARON WIEGERT

Partner
BKD LLP

CLARK WULF

Executive Vice President,
Corporate Tax Director
KEYCORP

NIKKI YARBOROUGH

Tax Partner
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Teams of 3 or more can save an additional \$200 per person off the prevailing rate. Groups must register at the same time to qualify for the offer. Offer cannot be applied retroactively to existing registrations and cannot be combined with any additional offers or discounts. This offer is not valid on workshop only registration packages. For group registration, please contact Robert Bushover at rbushover@alm.com or 212-457-9618.

Payment Terms and Online Registration

When registering online the system will require payment at the time you complete your registration form. The only acceptable form of payment for online processing is a valid credit card (Visa, MasterCard, American Express). If you cannot present a valid credit card at the time of payment or require an invoice in order to obtain payment from your organization, then you may register with Robert Bushover at 212-457-9618 or send a request to rbushover@alm.com.

Customer service is available during business hours on Monday through Friday from 9:00 AM - 5:00 PM (ET).

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SESSIONS, PANELS and **WORKSHOPS** designed for tax professionals in financial institutions. 2017 topics include:

- Overview of federal income tax and accounting developments
- Taxpayer and government positions on current issues being raised by the IRS for examination
- Overview of federal income tax issues and recent developments of significant interest to small and mid-sized banks
- Planning for Efficiency and Effectiveness in the Stress Testing Process
- Captive Insurance Update
- Compensation & Fringe Benefits Update
- FSI - Recent Tax Developments
- M&A Update
- S Corp Update
- SALT Update
- IRS Practice & Procedure Update
- Tax Accounting

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