

Federal Bar Association 45th Annual Tax Law Conference

03.03.2021

Jorge Castro, Tom Cryan,* Marc Gerson, Andrew Howlett, Loren Ponds, and Caroline Reaves will speak at the Federal Bar Association's 45th Annual Tax Law Conference, a virtual event, on March 3-5, 2021.

Gerson and Castro will moderate "Floyd's Panel: Legislative Update," on March 3. Senior staff from the House Committee on Ways and Means, the Senate Committee on Finance, and the Joint Committee on Taxation will provide their perspectives on the tax legislative outlook for 2021 and upcoming policy priorities.

Cryan will present "Hot Topics in Executive Compensation," a panel discussion on the latest trends in legislative and regulatory developments in employee benefits on March 3. Among other timely topics, panelists will discuss trends in executive compensation issues for 2021 and beyond.

Reaves will present, as part of a panel, "The TCJA 3 Years Later: Where Do We Stand Now?" on March 3. Panelists will provide an overview of key components of the TCJA, a historical perspective on the U.S. tax system pre-TCJA, what changed with the TCJA, and where things stand today. The panel will discuss major planning considerations with respect to these provisions, some of the ongoing challenges practitioners face when structuring transactions affected by TCJA, and practice points for younger tax lawyers who do tax planning work.

On March 4, Howlett will provide the "Section 163(j) Update," a panel discussion on recent developments relating to the section 163(j) limitation on business interest. The panel will discuss the final and proposed regulations issued in September 2020 and amendments made to section 163(j) by the CARES Act. Panelists will also focus on the effect of section 163(j) on corporations and consolidated groups.

Ponds will moderate the panel titled "International Tax Policy – New Administration, New Direction?" on March 5. This panel will explore international tax policy developments in the new Biden administration, including the status of campaign trail legislative proposals (amendments to GILTI rate, offshoring surcharge, minimum tax on book profits, etc.), new legislative proposals emerging in Congress, OECD Pillar 1 & 2 developments, and administrative actions, such as regulations and notices.

**Former Miller & Chevalier attorney*

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