Insurance Tax Conference

36th Annual Conference

November 3 and 4, 2011
Chicago Marriott O'Hare

Conference Program and Agenda

2011 PLANNING COMMITTEE

Edward M. Burgh
Law Office of Edward M. Burgh

Richard J. Burness
Deloitte Tax LLP

Stephen D. Collier
Genworth Financial

Dawn Cummings-Fritz
Zurich North America

Lawrence M. Friedman
Locke Lord, Bissell & Liddell LLP

Charles D. Friedstat
Friedstat Actuarial Consulting

Robert Gorey
Robert Gorey Consulting

Susan K. Leonard
PricewaterhouseCoopers LLP

Joseph F. McKeever, III
Davis & Harman LLP

Tom Quinn
Tom Quinn Consulting

Thomas M. Ronce
Pacific Life Insurance Company

Susan Seabrook
Skadden, Arps, Slate, Meagher & Flom LLP

Kim Sellers
KPMG LLP

D. Timothy Tammany
CIGNA Corporation

Tracy Williams
Sidley Austin, LLP

Thursday - November 3, 2011

7:15am – 5:30pm	**REGISTRATION OPEN (REGISTRATION A&B)**
7:15am – 8:00am	**CONTINENTAL BREAKFAST (CHICAGO BALLROOM A-E)**

8:00am – 8:10am

WELCOME AND INTRODUCTION (GRAND BALLROOM 1-4)

- **D. Timothy Tammany, ITC President**

8:10am – 9:00am

WASHINGTON UPDATE (GRAND BALLROOM 1-4)

- **D. Timothy Tammany,** *CIGNA Corporation*, **MODERATOR**

Keynote Speaker: Randolf H. Hardock, *Davis & Harman LLP*

Our keynote speaker will examine current tax policy and legislation in a time of unprecedented debt crises, economic uncertainty and a highly polarized political environment.

9:10am – 10:10am

LIFE /P&C/HEALTH UPDATE (GRAND BALLROOM 1-4)

- **Kim C. Sellers,** *KPMG LLP*, **MODERATOR**

This panel will discuss the recent developments in life, health and P&C insurance products that impact your company's bottom line.

Speakers: **Craig Pichette**, *KPMG LLP*
Frank Svoboda, *Torchmark Corporation*

10:10am – 10:40am	**COFFEE BREAK (BALLROOM FOYER)**

10:40am – 11:40am

ENFORCEMENT, INFORMATION REPORTING & WITHHOLDING (GRAND BALLROOM 1-4)

- **Dawn Cummings-Fritz,** *Zurich North America*, **MODERATOR**

Adding to the complexity and risk of operating in today's business environment, tax authorities in the US and abroad continue to expand information reporting and withholding requirements. Is your business ready? Our panelists will share technical and practical insights into the provisions under Section 1441 withholding, Foreign Account Tax Compliance Act (FATCA), Foreign Bank Account Reporting (FBAR), Section 3402(t) withholding on governmental payments, state and other withholding.

Speakers: **Amy Jackson**, *Zurich North America*
Deborah Pflieger, *Ernst & Young, LLP*

Thursday - November 3, 2011 - Continued

DAY 1 CONCURRENT SESSIONS – 11:50PM – 5:30PM

A-1
11:50am – 12:50pm

REINSURANCE (GRAND BALLROOM 1-4)

- **Lawrence Friedman,** *Locke Lord LLP*, **MODERATOR**

A discussion of recent developments affecting reinsurance, including risk transfer and international issues, and an update on section 845.

Speakers: **Angela Walitt**, *Baker & McKenzie*
Kirk Van Brunt, *Locke Lord Bissell & Liddell, LLP*

A-2
11:50am – 12:50pm

CONFORMITY (GRAND BALLROOM 5-7)

- **Susan Seabrook,** *Skadden, Arps, Slate, Meagher & Flom LLP* **MODERATOR**

The Conformity Rule: From *Standard Life & Accident* to *State Farm*

The Conformity Rule has been subjected to multiple challenges by the Internal Revenue Service in recent years. This panel will discuss the role of statutory accounting and Annual Statement reporting in determining insurance companies' Federal tax liability, as well as provide insights and analysis in connection with recent tax controversies on point.

Speakers: **Jean Male Baxley**, *Latham & Watkins, LLP*
R. Lee Christie, *Sidley Austin, LLP*

A-3
11:50am – 12:50pm

BASICS OF P&C PRIMER (SALONS 8-9-10)

- **Dawn Cummings-Fritz,** *Zurich North America*, **MODERATOR**

This panel will provide participants with an overview of the basic principles and provisions surrounding the taxation of property and casualty insurance companies.

Speakers: **Greg Domareki**, *Deloitte Tax LLP*
Anita Minassian, *AIG*

12:50pm – 2:00pm **LUNCH (CHICAGO BALLROOM A-E)**

Thursday - November 3, 2011 - Continued

B-1
2:00pm – 3:00pm

CASE STUDY (CHICAGO BALLROOM A-B)

- **Tracy Williams,** *Sidley Austin LLP*, **Facilitator**
- **Seth Rosen,** *Debevoise & Plimpton LLP*, **Facilitator**

This session will be something entirely new: an interactive workshop employing the "case" method. Participating ITC members will be asked to play the role of the Tax VP of Imaginary Global Insurance Group, as the company strategizes about ways to reduce the valuation allowance applicable to its deferred tax assets. Participants will be asked to work in small groups to brainstorm potential solutions for discussion by the larger group. The facilitators will use questions, dialogue and debate to engage participants in a thought-provoking and challenging environment. Advance registration will be required, and relevant materials will be distributed to participants for review before the conference. Participation will be limited to 40 registrants.

B-2
2:00pm – 3:00pm

P&C RESERVES (GRAND BALLROOM 1-4)

- **Robert Gorey,** *Robert Gorey Consulting*, **MODERATOR**

The panel will discuss IRS Exam Teams' increasing interest in P & C Loss Reserves, Loss Adjustment Expense Reserves, Extra Contractual Obligation Reserves, Guaranty Fund Assessment Reserves, Reserves for Residual Value Insurance, Medical Loss Ratio Rebates, Uncollectible Reinsurance, and the potential impact of IFRS.

Speakers: **Peter Winslow**, *Scribner, Hall & Thompson, LLP*
Howard Stecker, *Ernst & Young, LLP*

B-3
2:00pm – 3:00pm

LIFE PRODUCT HIGHLIGHTS (AND LOWLIGHTS) PRIMER (GRAND BALLROOM 5-7)

- **Joseph F. McKeever, III,** *Davis & Harman LLP*, **MODERATOR**

This panel will review some of the fundamental product tax rules with the goal of helping those who do not work with product tax issues understand why they should care about these rules, the costs and consequences of non-compliance, and how compliance problems can be addressed. Real life examples will be used to illustrate these points.

Speakers: **John Adney**, *Davis & Harman LLP*
Cecile Butler, *John Hancock*

3:00pm – 3:20pm **COFFEE BREAK (BALLROOM FOYER)**

C-1
3:20pm – 4:20pm

PRODUCTS (SALONS 8-9-10)

- **Thomas M. Ronce,** *Pacific Life Insurance Company*
  MODERATOR

This panel will discuss product tax issues associated with the design, issuance and administration of life insurance, annuity and long-term care products.

Speakers: **Tom Gick**, *Sutherland, Asbill & Brennan LLP*
Chris Phanco, *Pacific Life Insurance Company*

C-2
3:20pm – 4:20pm

2011 TRANSACTION REVIEW (GRAND BALLROOM 1-4)

- **D. Timothy Tammany,** *CIGNA Corporation*, **MODERATOR**

This panel will discuss the tax aspects of public company transactions and selected topics in private company deals including asset, reinsurance, assumption and stock transactions.

Speakers: **Barbra Beaulieu**, *Primerica*
Julie Goosman, *PricewaterhouseCoopers LLC*
Kristan Rizzolo, *Dewey & Leboeuf*

C-3
3:20pm – 4:20pm

INVESTMENTS PRIMER (GRAND BALLROOM 5-7)

- **Tom Quinn,** *Tom Quinn Consulting*, **MODERATOR**

What every insurance tax professional should know-the tax law basics of insurance company investments, including hedging.

Speakers: **Alan Fu**, *Prudential Financial, Inc.*
Dean Hindman, *Mass Mutual Life Insurance Co.*

D-1
4:30pm – 5:30pm

LIFE RESERVES (GRAND BALLROOM 5-7)

- **Charles D. Friedstat,** *Friedstat Actuarial Consulting*
  MODERATOR

This panel will present a discussion of life insurance company tax reserve issues including developments for in-force variable annuities with guaranteed living benefits (VAGLB's), Actuarial Guideline 43 post-implementation issues and recent developments, American Financial and CIGNA tax reserve litigation issues, and current IRS audit issues related to reserves with emphasis on annuity reserves. The panel will also deal with questions such as what is

LIFE RESERVES (CONTINUED FROM PREVIOUS PAGE)

CARVM and what the terms "prevailing view of the states" and "permissible reserve methods" mean.

Further, the panel will discuss any new developments in the life tax reserve area including principle based life reserves and any relevant new pronouncements by the IRS or Treasury.

Speakers: **Richard N. Bush**, *Ameriprise Financial*
Peter A. Marion, *Sun Life of Canada*

D-2
4:30pm – 5:30pm

ACCOUNTING & AUDITING (GRAND BALLROOM 1-4)

- **Susan Leonard,** *PricewaterhouseCoopers LLC,* **MODERATOR**

This panel will provide an update and discussion about SSAP 101, including status and implementation issues. The panel may also discuss new developments in GAAP and/or IFRS matters.

Speakers: **Steve Beaver**, *Nationwide Financial*
Tom Gibbons, *Pacific Life*

D-3
4:30pm – 5:30pm

CASE STUDY (CHICAGO BALLROOM A-B)

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5:30pm – 7:00pm **COCKTAIL RECEPTION (CHICAGO BALLROOM C-D-E)**

DINNER ON OWN

Friday - November 4, 2011

7:00am – 1:00pm	**REGISTRATION OPEN (REGISTRATION A&B)**
7:00am – 8:00am	**CONTINENTAL BREAKFAST (CHICAGO BALLROOM A-E)**

8:00am – 9:00am

LEGISLATIVE PROPOSALS (GRAND BALLROOM 1-4)

- **Tom Quinn,** *Tom Quinn Consulting*, **MODERATOR**

Changes to the tax laws are coming. What changes are supported by the insurance industry? What changes are of concern to the industry?

Speakers: **Doug Bates**, *Northwestern Mutual*
Pamela Olson, *Skadden Arps Slate Meaghen & Flom LLP*

DAY 2 CONCURRENT SESSIONS – 9:10AM – 10:10AM

E-1
9:10am – 10:10am

STATE TAX ISSUES (GRAND BALLROOM 1-4)

- **Tom Quinn,** *Tom Quinn Consulting*, **MODERATOR**

This panel will examine the changes in reporting and paying for premium taxes collected. There will also an examination of the procedure for requesting refunds, and for when and how long that can be done.

Speakers: **Michael Palm**, *PricewaterhouseCoopers LLC*
Christine Gustafson, *Gustafson Law*

E-2
9:10am – 10:10am

INTERNATIONAL TAX ISSUES (GRAND BALLROOM 5-7)

- **D. Timothy Tammany,** *CIGNA Corporation*, **MODERATOR**

In the aftermath of the greatest economic crisis that the world economy has experience in its history, this panel will discuss the changing taxation of global insurance companies.

Speakers: **Ted Clabault**, *Deloitte Tax LLP*
Robert Fiscella, *General Reinsurance Corporation*

10:10am – 10:30am	**COFFEE BREAK (BALLROOM FOYER)**

Friday - November 4, 2011 - Continued

10:30am – 11:30am

ASK THE EXPERTS (GRAND BALLROOM 1-4)

- **D. Timothy Tammany, ITC President**
  CIGNA Corporation, **MODERATOR**

This interactive session will allow attendees to exchange ideas with the conference speakers and each other to solidify the most significant insights from the various conference panels.

11:40am – 12:40pm

ETHICS IN A TRANSPARENT TAX ENVIRONMENT (GRAND BALLROOM 1-4)

- **Stephen D. Collier,** *Genworth Financial*, **MODERATOR**

The panel will explore the role of ethics in dealing with many of the challenging issues that arise in a still uncertain yet increasingly transparent tax environment.

Speakers: **Michael Chesman**, *Hartford Life*
Lance Rothenberg, *Hodgson Russ LLP*

12:40pm – 1:30pm

BUFFET LUNCH (CHICAGO BALLROOM C-E)
TAKE OUT BOXES WILL BE AVAILABLE

CONFERENCE ADJOURNS