



82nd Annual API Federal Tax Forum

April 18 -19, 2016 | Westin Houston Memorial City | Houston, TX | www.api.org

**as of April 1, 2016 | Agenda subject to change*

Monday, April 18, 2016

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| 7:00 am – 5:00 pm | Registration |
| 7:30 am – 8:30 am | Continental Breakfast - Sponsored by Mayer Brown LLP |
| | General Session Michelle McGrath, Shell Presiding Officer |
| 8:30 am – 9:30 am | Washington Report API |
| 9:30 am -10:30 am | Tax Function of the Future Mike Shehab and Andy Ruggles, PwC |
| 10:30 am – 10:50 am | Break |
| 10:50 am – 12:00 pm | IRS Update Michael Dolan, KPMG |
| 12:00 pm – 1:15 pm | Lunch |
| 1:15 pm – 2:30 pm | Litigation Update Kevin Kenworthy and Kevin Downing, Miller & Chevalier |
| 2:30 pm – 3:30 pm | Tax and Information Reporting John Mennel and Denise Hintzke, Deloitte |
| 3:30 pm – 3:50 pm | Break |
| 3:50 pm – 5:00 pm | Large Partnership Issues: State of MLP market, Larger Partnership Audit Rules Barksdale Penick and Greg Matlock, EY |
| 5:00 pm – 6:00 pm | Reception – Sponsored by EY |

Tuesday, April 19, 2016

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| 7:00 am – 5:00 pm | Registration |
| 7:30 am – 8:30 am | Continental Breakfast – Sponsored by Baker Botts LLP |
| | Domestic Breakout Session Stephen Comstock, API – Presiding |
| 8:30 am – 9:30 am | Domestic Update Kevin Richards, Wes Poole, and Susan Thibodeaux, EY |
| 9:30 am – 10:30 am | Ethical Issues Facing Tax Departments Ed Osterberg and Scott Stewart, Mayer Brown LLP |
| 10:30 am – 10:50 am | Break |
| 10:50 am – 12:00 pm | Sub C and M&A Issues Bryan Collins, Deloitte |
| 12:00 pm – 1:15 pm | Lunch |

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| 1:15 pm – 2:30 pm | Credit and Incentive Opportunities Marc Caillouet, Joseph Maselli, Mark Scimemi, PwC and Holly Roemisch, CITGO |
| 2:30 pm – 3:30 pm | Private Equity Development Joint Ventures Liz McGinley and Alan Rafte, Bracewell LLP |
| 3:30 pm – 3:50 pm | Break |
| 3:50 pm – 5:00 pm | Planning Losses- AMT and Managing NOLS David Scott and Bob Swiech, KPMG |
| | International Breakout Session Heather Crowder, Conoco Phillips – Presiding |
| 8:30 am – 9:30 am | International Update Ron Dabrowski and Chetan Vagholkar, KPMG |
| 9:30 am -10:30 am | Discontinuities Between Sections 904 and 907 Scott Farmer, Morgan Lewis and Glenn Leischner, Anadarko |
| 10:30 am – 10:50 am | Break |
| 10:50 am – 12:00 pm | Foreign Country Update (Focus on Asia-Pacific) John Fiorito, Trang Martin, Chris Finnerty and Alfredo Alvarez, EY |
| 12:00 pm – 1:15 pm | Lunch |
| 1:15 pm – 2:30 pm | Transfer Pricing John Wells and Joe Tobin, Deloitte |
| 2:30 pm – 3:30 pm | BEPS – Managing the Issues Heather Crowder, Conoco Phillips, Nanette Sorman, ExxonMobil and Paul Romanick, Shell |
| 3:50 pm – 5:00 pm | Choice of Entity in the International Operations Christopher Gilbert and James Prettyman, PwC |