

85th Annual API Federal Tax Forum

April 29-30, 2019 | Westin Houston Memorial City | Houston, TX | www.api.org

*updated 4/22/19

	Monday, April 29, 2019	Tuesday, April 30, 2019	
7:30am – 5:00pm	Registration	Registration	
7:30am – 8:30am	Continental Breakfast	Continental Breakfast	
		Domestic Breakout Session	International Breakout Session
8:30am – 9:30am	Washington Report <i>Stephen Comstock, API and Jon Traub, Deloitte</i>	Domestic Update <i>Jon Stephens, Trey Cornelius and Mike Daniels, Deloitte</i>	International Update <i>Mike Masciangelo, Max Van den Bergh and Trey Whitten, EY</i>
9:30am -10:30am	Accounting/Compliance Update <i>Matt Rychlicki, Sarah Busker, Brian Foley and Kelly Hales, EY</i>	45Q Update <i>David Blair and David Fischer, Crowell & Moring and Vincent Alspach, Oxy</i>	Management of FTCs in a TCJA World <i>Ron Dabrowski and Doug Holland, KPMG</i>
10:30am – 10:50am	Break	Break	Break
10:50am – 12:00pm	IRS Update <i>Mike Dolan and Victoria Sherlock, KPMG</i>	Future of MLPs <i>Tim Fenn and Bryant Lee, Latham & Watkins</i>	Engaging on Global Tax Policy in Developing Countries <i>Dan Witt, ITIC, Evelyn Su, ExxonMobil, Aric Mann, Anadarko and Karl Schmalz, ExxonMobil (Ret.), ITIC Senior Fellow</i>
12:00pm – 1:15pm	Lunch	Lunch	Lunch
1:15pm – 2:30pm	Planning for TCJA Litigation <i>Richard Hussein and Jon Nelsen, Baker Botts</i>	163(j) Limitation <i>Shawn O'Brien, Ed Osterberg and Steven Garden, Mayer Brown</i>	GILTI <i>Michael Caballero and Dan Luchsinger, Covington & Burling</i>
2:30pm – 3:30pm	Regulation Writing Review and the APA <i>Kevin Kenworthy and Layla Asali, Miller & Chevalier</i>	TCJA Subsequent Guidance on Structuring and Negotiating M&A Transactions <i>Liz McGinley and Steven Lorch, Bracewell</i>	BEAT <i>Josh Odintz, Jonathan Martin, Alexandra Minkovich, Baker McKenzie and John Misso, Shell</i>
3:30pm – 3:50pm	Break	Break	Break
3:50pm – 5:00pm	Economic Outlook of Oil and the Economy and Impact of Tax Policy <i>Dean Foreman, API and Drew Lyon, PwC</i>	Subchapter K Update <i>Todd McArthur, Craig Gerson PwC and Rochelle Seade, Chevron</i>	International Response to the TCJA <i>Rocco Femia and Loren Ponds, Miller & Chevalier</i>
5:00pm – 6:00pm	Networking Reception		