

53rd Annual

BANK & CAPITAL MARKETS TAX INSTITUTE

November 7-9, 2018 | Hilton Orlando - Lake Buena Vista, FL

11/07/2018

7:30 am - 9:00 am

Registration Open

8:00 am - 9:00 am

Networking Breakfast

8:30 am - 5:00 pm

Bank Tax Tutorial

David A. Thornton, Partner, Financial Institutions Tax Group, Crowe LLP

Patrick Egan, Senior Vice President, Corporate Tax, New York Community Bancorp

Trudie Kanter, Senior Manager, Crowe LLP

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, review available bad debt conformity alternatives and analyze the impact of the recently enacted Tax Cuts and Jobs Act on areas of significant interest to banks.

8:30 am - 5:00 pm

24th Annual Community Bank Tax Workshop

John E. Cederberg, CPA Faculty Chair, Principal, John E. Cederberg, CPA
Randy J. Churchill, CPA, Director, Moss Adams LLP
Paul A. Sirek, Partner, Financial Institutions Services Group , Eide Bailly LLP
Justin Horst, Chief Financial Officer , Pinnacle Bancorp, Inc.

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 holding companies, and their outside accountants and counsel.

The changes made by the Tax Cuts and Jobs Act, and the guidance expected from the IRS before the Workshop in November, will provide more than enough material to fill the day with lively discussion. We will need to spend whatever time is necessary to explore the application of the 20% qualified business deduction to S corporation bank shareholders. We will also explore the effect of the rate changes on the continued viability of the S election. There are other material changes affecting community banks; such as changes to the taxation of bank owned life insurance, depreciation changes (often ignored by banks because depreciable property is usually immaterial, but now made very material to branch construction and "asset" changes of control), and new limitations on certain deductions common in commercial banks.

Accounting initiatives from the FASB will also result in new and complex Schedule M-3 items to discuss.

And finally, amid all of this chaos, the old issues have not gone away.

It will be a fast paced and very interesting day!

12:00 pm - 1:00 pm

Lunch

1:00 pm - 5:00 pm

Tax Automation: What You Need to Know

Garth Roark, Managing Director, Data & Analytics, KPMG LLP
Dan Magnus, Manager, Data & Analytics, KPMG LLP
Lyle Mohler, Sr. Manager, National Tax – Banking & Capital Markets, KPMG LLP
Tony Welburn, Partner, Business Tax Services, KPMG LLP
Tracy Graham, Senior Manager, KPMG LLP

As banking organizations strive to implement digital transformation strategies, process automation technology continues to evolve. There are currently tremendous opportunities for finance, accounting, and tax managers to deploy these new technologies within their own departments. Successfully automating redundant and time-consuming processes can provide

real value to departments of any size; however, jumping into the world of automation can bring many questions and traps for the unwary.

This half-day workshop will start off by laying the foundation on which successful automation projects are based. During the first hour, technology professionals from KPMG's Tax Ignition team will share leading practices for:

- Establishing an automation strategy
- Selecting the right technology
- Choosing the right use cases
- Enabling data
- Effectively using visualizations
- Measuring the return on investment

During the remaining three hours, the focus shifts from strategy to the application of automation technology to solve common problems faced by many banks. We will showcase the various technology solutions that are being deployed by finance, accounting, and tax departments before diving into a hands-on case study using one of the available technologies to solve a state apportionment data challenge.

At the conclusion of this workshop, participants should be able to identify use cases that align with their department's goals and objectives, evaluate the technology options available to them, and understand the basics of deploying automation technology.

3:00 pm - 3:30 pm

Mid-Afternoon Stretch

5:00 pm - 6:30 pm

Welcome Reception

11/08/2018

7:00 am - 8:00 am

Networking Breakfast

7:00 am - 8:00 am

Registration Open

7:55 am - 8:35 am

Keynote: The Economics of Tax Reform

Curtis Dubay, Senior Economist, American Bankers Association

American Bankers Association's Senior Economist, Curtis Dubay will talk about current economic trends and how they relate to the banking industry. As part of that, he will review in detail how he believes the recent tax reform law impacts the

economy and how much it will increase economic growth over time. Curtis will also talk about how tax reform and the growth it creates will affect the banking industry and industry-specific policies contained in the law.

8:35 am - 9:15 am

Keynote: Legislative Developments and Regulatory Reform

James Ballentine, Executive Vice President of Congressional Relations and Political Affairs , American Bankers Association

American Bankers Association's EVP of Congressional Relations and Political Affairs, James Ballentine, will discuss the significant banking regulatory legislative events for 2018 and the outlook for the Congressional lame duck session. In addition, James will discuss the results and implications of the mid-term elections on the outlook for the banking industry.

9:15 am - 10:30 am

General Banking & Tax Reform Update

James Ahern, Tax Director-Capital Markets, Synchrony Financial
Ethan Schiffman, Principal, Financial Services Organization (FSO) Tax, EY
Ellen Rotenberg, Banking and Capital Markets Tax Leader, PwC
Denise Schwieger, Principal, PwC

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.

10:30 am - 11:00 am

Mid-Morning Break

11:00 am - 12:15 pm

IRS Developments

John P. Kinsella, Vice President, Tax Policy, American Bankers Association
Lee Moskowitz, Partner, Global Banking, KPMG LLP
Erika Bonner, Partner, Business Tax Services, KPMG LLP
Tony Welburn, Partner, Business Tax Services, KPMG LLP
Liz L'Hommedieu, Principal, National Tax – Banking & Capital Markets, KPMG LLP
Mark Erwin, Acting Deputy Associate Chief Counsel, Financial Institutions & Products, Internal Revenue Service

Led by representatives from industry and public accounting, as well as 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.

12:15 pm - 1:45 pm

Lunch Keynote: Federal Tax Policy and Congressional Outlook

Nick Giordano, US Tax Policy Leader, EY

A discussion about the state of play on Federal tax policy matters (both legislative and regulatory) and what impact the results of the mid-term elections have on the tax agenda for the lame-duck session of Congress and 2019.

Breakout Sessions Begin

2:00 pm

2:00 pm - 3:30 pm

Community Banking Update

Colleen Delger, CPA, Vice President, Tax Manager, Banner Bank

David A. Thornton, Partner, Financial Institutions Tax Group, Crowe LLP

Sheryl Vander Baan, CPA, Tax Partner, Crowe LLP

Kevin Powers, Tax Partner, Crowe LLP

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 overview of recent tax law changes enacted under the Tax Cuts and Jobs Act that are of particular interest to community banks, an update on recent IRS pronouncements and initiatives impacting community banks, and planning for the impact of relevant GAAP changes on the federal income tax calculation that every bank will need to know. All topics will be presented from a community banking perspective by practitioners who serve this market extensively.

FSI - Recent Tax Developments

Michelle Messer, Global Head of Business Tax Advisory, Citi

Charles Hill, Managing Director , PwC

David Merrick, Managing Director , PwC

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

GAAP and Regulatory Update

Clark Wulf, Executive Vice President, Corporate Tax Director, KeyCorp

Gabe Nachand, CPA, Partner, Moss Adams LLP

This session will provide an update on recent developments in financial reporting, including new and proposed standards for both public and private companies, and a discussion of current hot topics.

3:30 pm - 4:00 pm

Mid-Afternoon Stretch

4:00 pm - 5:30 pm

S Corp Update

Jeremy Uhl, Vice President of Finance, Security National Bank

Gary Genenbacher, Tax Partner, BKD

Aaron Wiegert, CPA, BKD

Bank Stress Testing

James Ahern, Tax Director-Capital Markets, Synchrony Financial

Heather Wallace, Tax Partner, DHG Financial Services

Mike Dempsey, Senior Manager, DHG

Comp & Fringe Benefits Update

Walter Doggett III, Vice President of Tax, E*Trade Financial Corporation

Dan Gross, CPA, Senior Manager, Grant Thornton LLP

Albert Arazi, CPA, Tax Manager, Grant

The Tax Cuts & Jobs Act has certainly changed the landscape for Sub S banks. Does it still make sense to be a Sub S bank? What are the significant factors that must be considered as part of the analysis? In this session, we will explore these issues and discuss in detail the impact of the Tax Cuts & Jobs Act on Sub S bank shareholders.

Financial Services

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.

Thornton LLP

Eric Schechter, Senior Manager, Compensation & Benefits, KPMG LLP
Kelli Cacciotti, Senior Associate, National Tax – Compensation & Benefits, KPMG LLP

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.

5:30 pm - 6:30 pm

Networking Cocktail Reception

11/09/2018

7:30 am - 8:00 am

Networking Breakfast

8:00 am - 9:00 am

Keynote: Banking On Change: Change Is Everywhere In Banking

Christopher Marinac, Co-founder and Director of Research, FIG Partners LLC

The US Banking industry is in the midst of record profits, capital levels, and stock valuations. This has been fueled by CHANGE in the past 20 months with ongoing regulatory reform, a regime shift in Washington (that may not yet be completed), improved investor attitudes, and significant merger transaction activity across all Asset sizes. Catch up on the latest observations at ground level from an industry analyst covering public and private Banks nationwide with over 26 years of experience. Christopher Marinac, co-founder and Director of Research from FIG Partners LLC is waist-deep in the ever-changing Banking business and surrounding financial ecosystem. He shares his perspective, including the recent quarterly reports from financial institutions and a look ahead to the major issues in 2019.

9:00 am - 10:15 am

SALT Update

Walter Doggett III, Vice President of Tax, E*Trade Financial Corporation

Bill Reilly, Partner, Grant Thornton LLP

Howard Polonetsky, Director, State & Local Tax, Grant Thornton LLP

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.

Mid-Morning Break

10:15 am - 10:35 am

10:35 am

Breakout Sessions Begin

10:35 am - 12:05 pm

Tax Accounting Update

Brett Scribner, Senior Vice President,
Director of Tax, U.S. Bancorp
Jennifer Sanders, CPA, Director, BKD
Nikki Yarborough, Tax Partner, DHG LLP

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.

M&A Update

Ron Copher, CFO, Glacier Bancorp, Inc.
Nick Gruidl, Partner, Washington National
Tax , RSM US LLP
Stefan Gottschalk, Senior Director,
Washington National Tax, RSM US LLP
Ronald J. Kolodkin, Partner, RSM US LLP

The program will include a panel discussion of corporate and M&A tax topics that impact banks and financial institutions. Topics will include the impact of tax reform on M&A, section 382 and net operating loss issues, recent developments from the IRS and Treasury and interesting transaction trends.

IRS Practice & Procedure Update

Dean M. Fischbeck, Senior Vice President,
Bank of America
Susanne Muller, Executive Director, UBS AG
– Group Tax
John R. Keenan, Managing Director, Deloitte

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.

12:05 pm - 1:00 pm

Networking Lunch

1:00 pm - 2:30 pm

Tax Credits

James Ahern, Tax Director-Capital Markets,
Synchrony Financial
Kevin Powers, Tax Partner, Crowe LLP
Gary L. Hecimovich, Partner, Deloitte

This panel will discuss the various aspects and implications of Federal tax credits, including the issuance of new

Tax Process Automation

Adrian Fenton, U.S. Tax Services Director,
Asset Servicing, Bank of New York Mellon
Chris Dobson, Partner / Principal, EY
Michael Weinberg, Principal, Ernst & Young

Technology continues to change at a rapid pace. Tax is not immune and a new wave of technologies can provide significant automation and risk

proposed regulations. The panel will provide insight into the ways financial institutions can participate in these programs and dissect current market trends.

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.

management benefits for tax processes from tax reform, planning, to controversy, accounting, compliance and regulatory reporting. Please join us in this session as we discuss the new wave of intelligent automation, data remediation and the potential benefits within your tax department.