

U.S. House of Representatives
Committee on Ethics

LEGISLATIVE RESOURCE CENTER

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EMPLOYEE POST-TRAVEL DISCLOSURE FORM

This form is for disclosing the receipt of travel expenses from private sources for travel taken in connection with official duties. This form does not eliminate the need to report privately-funded travel on the annual Financial Disclosure Statements of those employees required to file them. In accordance with House Rule 25, clause 5, you must complete this form and file it with the Clerk of the House, 135 Cannon House Office Building, within 15 days after travel is completed. Please do not file this form with the Committee on Ethics.

NOTE: Willful or knowing misrepresentations on this form may be subject to criminal prosecution pursuant to 18 U.S.C. § 1001.

1. Name of Traveler: Viva Hammer
2. a. Name of accompanying relative: _____ or None
 b. Relationship to Traveler: Spouse Child Other (specify): _____
3. a. Dates of departure and return: Departure: 2017/1/16 Return: 2017/1/17
 b. Dates at personal expense (if any): _____ or None
4. Departure city: WASHINGTON Destination: NY Return city: WASHINGTON
5. Sponsor(s) (who paid for the trip): Practising Law Institute
6. Describe meetings and events attended: Taxation of Financial Products and Transactions 2017
7. Attached to this form are EACH of the following (signify that each item is attached by checking the corresponding box):
 - a. a completed Sponsor Post-Travel Disclosure Form;
 - b. the Primary Trip Sponsor Form completed by the trip sponsor prior to the trip, including all attachments and Grantmaking or Non-Grantmaking Sponsor Forms;
 - c. page 2 of the completed Traveler Form submitted by the employee; and
 - d. the letter from the Committee on Ethics approving my participation on this trip.
8. a. I represent that I participated in each of the activities reflected in the attached sponsor's agenda. (Signify that statement is true by checking box):
 b. If not, explain: _____

I certify that the information contained on this form is true, complete, and correct to the best of my knowledge.

SIGNATURE OF TRAVELER: Viva Hammer DATE: 2017/1/24

I authorized this travel in advance. I have determined that all of the expenses listed on the attached Sponsor Post-Travel Disclosure form were necessary and that the travel was in connection with the employee's official duties and would not create the appearance that the employee is using public office for private gain.

NAME OF SUPERVISING MEMBER: Erin Hatch DATE: _____

SIGNATURE OF SUPERVISING MEMBER: Erin Hatch

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**U.S. House of Representatives
Committee on Ethics**

SPONSOR POST-TRAVEL DISCLOSURE FORM

This form must be completed by an officer of any organization that served as the primary trip sponsor in providing travel expenses or reimbursement for travel expenses to House Members, officers, or employees under House Rule 25, clause 5. *A completed copy of the form must be provided to each House Member, officer, or employee who participated on the trip within 10 days of their return.* You must answer all questions, and check all boxes, on this form for your submission to comply with House rules and the Committee's travel regulations. Failure to comply with this requirement may result in the denial of future requests to sponsor trips and/or subject the current traveler to disciplinary action or a requirement to repay the trip expenses.

NOTE: Willful or knowing misrepresentations on this form may be subject to criminal prosecution pursuant to 18 U.S.C. § 1001.

1. Sponsor(s) (who paid for the trip): Practising Law Institute (PLI)

2. Travel Destination(s): New York City

3. Date of Departure: 1/16/17 Date of Return: 1/17/17

4. Name(s) of Traveler(s): Viva Hammer
(NOTE: You may list more than one traveler on a form only if all information is identical for each person listed.)

5. Actual amount of expenses paid on behalf of, or reimbursed to, each individual named in response to Question 4:

	Total Transportation Expenses	Total Lodging Expenses	Total Meal Expenses	Other Expenses (dollar amount per item and description)
Traveler	\$178	\$0	\$0	\$0
Accompanying Relative	N/A	N/A	N/A	N/A

6. All expenses connected to the trip were for actual costs incurred and not a *per diem* or lump sum payment. (Signify statement is true by checking box):

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 

Name: Laura Shields Title: Vice President, Programs

Organization: Practising Law Institute

I am an officer of the above-named organization (signify statement is true by checking box):

Address: 1177 Avenue of the Americas, 3rd Floor
New York, NY 10036

Telephone number: 212-824-5865 (Contact: Stacey Greenblatt)

Email Address: sgreenblatt@pli.edu

Committee staff may contact the above-named individual if additional information is required.

If you have questions regarding your completion of this form, please contact the Committee on Ethics at (202) 225-7103.

U.S. House of Representatives
Committee on Ethics

TRAVELER FORM

1. Name of Traveler: Viva Hammer
2. Sponsor(s) (who will be paying for the trip): Practising Law Institute
3. Travel destination(s): NY
4. a. Date of departure 1/16/2017 Date of return: 1/17/2017
b. Will you be extending the trip at your personal expense? Yes No
If yes, dates at personal expense: _____
5. a. Will you be accompanied by a relative at the sponsor's expense? Yes No
b. If yes:
(1) Name of accompanying relative: _____
(2) Relationship to traveler: Spouse Child Other (specify): _____
(3) Accompanying relative is at least 18 years of age: Yes No
6. a. Did the trip sponsor answer "yes" to Question 9(d) on the Primary Trip Sponsor Form (i.e., travel is sponsored by an entity that employs a registered federal lobbyist or foreign agent and you are requesting lodging for two nights)? Yes No
b. If yes, explain why the second night of lodging is warranted:
n/a

7. Primary Trip Sponsor Form is attached, including agenda, invitee list, and any other attachments and contributing sponsor forms: Yes No
NOTE: The agenda should show the traveler's individual schedule, including departure and arrival times and identify the specific events in which the traveler will be participating.

8. Explain why participation in the trip is connected to the traveler's individual official or representational duties. Staff should include their job title and how the activities on the itinerary relate to their duties.
I am responsible for the area of the Tax Law being discussed at the panel as part of my duties as legislation counsel at JCT
9. Is the traveler aware of any registered federal lobbyists or foreign agents involved in planning, organizing, requesting, and/or arranging the trip? Yes No

10. **FOR STAFF TRAVELERS:**
TO BE COMPLETED BY YOUR EMPLOYING MEMBER:

ADVANCED AUTHORIZATION OF EMPLOYEE TRAVEL

I hereby authorize the individual named above, an employee of the U.S. House of Representatives who works under my direct supervision, to accept expenses for the trip described in this request. I have determined that the above-described travel is in connection with my employee's official duties and that acceptance of these expenses will not create the appearance that the employee is using public office for private gain.

Date: 1/17/16


Signature of Employing Member

U.S. House of Representatives
Committee on Ethics

PRIMARY TRIP SPONSOR FORM

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers, or employees under House Rule 25, clause 5. A completed copy of this form (and any attachments) should be provided to each invited House Member, officer, or employee, who will then forward it to the Committee together with a Traveler Form at least 30 days before the start date of the trip. The trip sponsor should NOT submit the form directly to the Committee. The Committee Web site (ethics.house.gov) provides detailed instructions for filling out the form.

NOTE: Willful or knowing misrepresentations on this form may be subject to criminal prosecution pursuant to 18 U.S.C. § 1001. Failure to comply with the Committee's Travel Regulations may also lead to the denial of permission to sponsor future trips.

1. Sponsor (who will be paying for the trip): _____
Practising Law Institute (PLI)
2. I represent that the trip will not be financed (in whole or in part) by a registered federal lobbyist or foreign agent (signify that the statement is true by checking box):
3. Check only one. I represent that:
 - a. the primary trip sponsor has not accepted from any other source funds intended directly or indirectly to finance any aspect of the trip *or*
 - b. the trip is arranged without regard to congressional participation and the primary trip sponsor has accepted funds only from entities that will receive a tangible benefit in exchange for those funds *or*
 - c. the primary trip sponsor has accepted funds from other source(s) intended directly or indirectly to finance all or part of this trip and has enclosed disclosure forms from each of those entities.If "c" is checked, list the names of the additional sponsors: _____
4. Provide names and titles of ALL House Members and employees you are inviting. For each House invitee, provide an explanation of why the individual was invited (include additional pages if necessary):
Viva Hammer is invited to speak on the panel on "Mark-to-Market for Derivatives at PLI's "Taxation of Financial Products & Transactions 2017" program
5. Is travel being offered to an accompanying relative of the House invitee(s)? Yes No
6. Date of departure: 1/16/17 Date of return: 1/17/17
7. a. City of departure: Washington, D.C.
b. Destination(s): New York, NY
c. City of return: Washington, D.C.
8. I represent that (check one of the following):
 - a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: *or*
 - b. The sponsor of the trip does not retain or employ a registered federal lobbyist or foreign agent: *or*
 - c. The sponsor employs or retains a registered federal lobbyist or foreign agent, but the trip is for attendance at a one-day event and lobbyist/foreign agent involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations.
9. Check one of the following:
 - a. I checked 8(a) or (b) above:
 - b. I checked 8(c) above but am not offering any lodging:
 - c. I checked 8(c) above and am offering lodging and meals for one night: *or*
 - d. I checked 8(c) above and am offering lodging and meals for two nights:If "d" is checked, explain why the second night of lodging is warranted: _____

10. Attached is a detailed agenda of the activities the House invitees will be participating in during the travel (i.e., an hourly description of planned activities for trip invitees) (Indicate agenda is attached by checking box):

11. Check one:

- a. I represent that a registered federal lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (signify that the statement is true by checking box): *or*
b. N/A - trip sponsor is a U.S. institution of higher education.

12. For each sponsor required to submit a sponsor form, describe the sponsor's interest in the subject matter of the trip and its role in organizing and/or conducting the trip:

Since 1933 PLI is a nonprofit educational organization and professional business training organization, founded in 1933, dedicated to providing the legal community and allied professionals

with the most up to date, relevant information & techniques for practice in varied areas of law, including tax. The program, which is the purpose of the trip, is one of over 400 that PLI offers each year to fulfill its mission to educate legal and allied professionals across the country.

13. Answer parts a and b. Answer part c if necessary.

- a. Mode of travel: Air Rail Bus Car Other (Specify: _____)
b. Class of travel: Coach Business First Charter Other (Specify: _____)
c. If travel will be first class or by chartered or private aircraft, explain why such travel is warranted:

14. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify that the statement is true by checking box):

15. I represent that either (check one of the following):

- a. The trip involves an event that is arranged or organized without regard to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees: *or*
b. The trip involves events that are arranged specifically with regard to congressional participation:

If "b" is checked:

1) Detail the cost per day of meals (approximate cost may be provided): _____

2) Provide reason for selecting the location of the event or trip: _____

16. Name, nightly cost, and reasons for selecting each hotel or other lodging facility:

Hotel name: Hyatt City: New York Cost per night: \$390

Reason(s) for selecting: Location is in close proximity of the seminar

Hotel name: The Muse City: New York Cost per night: \$390

Reason(s) for selecting: Location is in close proximity of the seminar

Hotel name: _____ City: _____ Cost per night: _____

Reason(s) for selecting: _____

17. I represent that all expenses connected to the trip will be for actual costs incurred and not a per diem or lump sum payment. (signify that the statement is true by checking box):

18. TOTAL EXPENSES FOR EACH PARTICIPANT:

<input type="checkbox"/> actual amounts <input checked="" type="checkbox"/> good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	\$500	\$390	\$50
For each accompanying relative	N/A	N/A	N/A

	Other Expenses (dollar amount per item)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee	\$300	Transportation (train or cab) to and from station in departure and arrival cities. Transportation to and from meals
For each accompanying relative	N/A	

NOTE: Willful or knowing misrepresentations on this form may be subject to criminal prosecution pursuant to 18 U.S.C. § 1001.

19. Check one:

- a. I certify that I am an officer of the organization listed below. *or*
 b. N/A - sponsor is an individual or a U.S. institution of higher education.

20. I certify that I am not a registered federal lobbyist or foreign agent for any sponsor of this trip.

21. I certify by my signature that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 

Name: Laura Shields

Title: Vice President, PPrograms

Organization: Practising Law Institute (PLI)

Address: 1177 Avenue of the Americas, 3rd Floor, New York, NY 10036

Telephone number: 212-824-5865 (Contact: Stacey Greenblatt)

Email address: sgreenblatt@pli.edu

If there are any questions regarding this form please contact the Committee at the following address:

Committee on Ethics
 U.S. House of Representatives
 1015 Longworth House Office Building
 Washington, DC 20515
 (202) 225-7103 (phone)
 (202) 225-7392 (general fax)

Version date 4/2013 by Committee on Ethics

Taxation of Financial Products and Transactions 2017
New York City and Live Webcast, www.pll.edu, January 17, 2017
Atlanta Groupcast location, January 17, 2017

Why You Should Attend

Recent activity in both the executive and legislative branches of government has brought change to the financial products area. The proposed Section 385 regulations threaten traditional practices and transactions, while mark-to-market is once again on the horizon for a wide array of derivatives. Even where U.S. tax rules have not changed, the actions of foreign governments may make tax planning more difficult and many common financial transactions will raise puzzling issues. This year's program has been completely redesigned to help you understand the latest changes to the landscape of the taxation of financial products and transactions, and provide new insight into familiar planning strategies.

What You Will Learn

- Analyze the impact of the Section 385 proposed regulations on financial products
- Explore the latest withholding tax issues, including contingent interest and commitment fees
- Examine interesting issues with swaps under current law:
 - Multiple underlying assets
 - Wash sale/deemed exchange issues
 - Credit default swaps over a foreign currency denominated FX bond
- Hear our experts' thoughts on when a derivative over an illiquid asset will be treated as an ownership interest
- Understand the implications of Senator Wyden's legislative proposal to mark-to-market all derivatives
- Study the tax issues arising from guarantees in a variety of contexts

Who Should Attend

Attorneys at law and accounting firms who advise clients on financial transactions and products; in-house tax professionals who help structure transactions and make FIN 48 determinations; hedge fund traders who want a better understanding of the tax rules governing financial products and transactions; accountants who work in the area of financial products; people who advise hedge fund managers banks, and insurance companies; and government attorneys who want to stay on top of what's happening in the capital markets will benefit from attending this program.

Program Schedule

Morning Session: 9:00 a.m. – 12:30 p.m.

9:00

Introduction and Opening Remarks

Matthew A. Stevens

NEW SESSION

9:15

Exploring the IRS Priority Guidance Plan

- Government officials discuss current business plan items including:
 - new regulations under AHYDOs

- o new regulations governing the deduction of repurchase premiums on convertible bonds
- o new regulations governing contingent nonperiodic payments on swaps
- o new guidance on accounting for hedging transactions
- o regulations under Section 475
- What can we expect to see guidance on in the coming months?

Helen M. Hubbard (Invited), Erika W. Nijenhuis, Matthew A. Stevens, Krishna P. Vallabhaneni (Invited)

NEW SESSION

10:15

Section 385-1 and 2

- Impact of the final regulations on cash pooling
- Remaining traps and pitfalls
- The IRS's new bifurcation authority

Elizabeth G. Hale, Richard G. Larkins, Filiz A. Serbes (Invited), Helen Yanchisin, Bratt York (Invited)

11:15 Networking Break

NEW SESSION

11:30

Interesting Withholding Tax Issues

- Ways to satisfy the registered form requirement
- Dealing with contingent interest payments
- Managing the risk of commitment fees

Mark E. Erwin (Invited), Dominique Padilla Gallego, Elena V. Romanova, Karl T. Walli (Invited)

12:30 Lunch

Afternoon Session: 1:45 p.m. – 5:00 p.m.

NEW SESSION

1:45

Tax Issues Arising from Guarantees

- What happens when a Guarantor must pay?
- Withholding tax issues arising from guarantees

Helen M. Hubbard (Invited), Jiyeon Lee-Lim, David S. Miller, Michael B. Shulman

NEW SESSION

2:45

Interesting Issues with Swaps under Current Law

- Consequences for taxpayers with multiple lots of stock underlying a swap
- Wash sale/deemed exchange issues
- Credit default swaps over an FX bond
- Contingent nonperiodic payments – will the IRS now accept wait-and-see?

Shimon A. Berger, Pamela Lawrence Endreny, Jason G. Kurth (Invited), Mark S. Perwien (Invited)

3:45 Networking Break

NEW SESSION

4:00

Mark-to-Market for Derivatives

- The Modernization of Derivatives Act, the problems it solves and additional problems it creates
- Alternatives to the Modernization of Derivatives Act that might have been more successful

Michael S. Farber, Viva Hammer (Invited), John Kaufmann, Steven M. Rosenthal

5:00 Adjourn

Chair:

Matthew A. Stevens

EY

Washington D.C.

Faculty:

Shimon A. Berger

Director

Tax Advisory Services, Americas

Deutsche Bank AG, New York

New York City

Pamela Lawrence Endreny

Skadden, Arps, Slate, Meagher & Flom LLP

New York City

Mark E. Erwin (Invited)

Branch Chief, Branch 5

Office of the Associate Chief Counsel (International)

Internal Revenue Service

Washington, D.C.

Michael S. Farber

Davis Polk & Wardwell LLP

New York City

Dominique Padilla Gallego

Sidley Austin LLP

New York City

Liz G. Hale

EY

Washington, D.C.

Viva Hammer (Invited)

Legislation Counsel

Joint Committee on Taxation

Washington, D.C.

Helen M. Hubbard (Invited)
Associate Chief Counsel (Financial Institutions & Products)
Internal Revenue Service
Washington, D.C.

John Kaufmann
Greenberg Traurig, LLP
New York City

Jason G. Kurth (Invited)
Assistant to the Branch Chief, Branch 1
Office of the Associate Chief Counsel (Financial Institutions & Products)
Internal Revenue Service
Washington, D.C.

Richard G. Larkins
EY
Washington D.C.

Jiyeon Lea-Lim
Latham & Watkins LLP
New York City

David S. Miller
Proskauer
New York City

Erika W. Nijenhuis
Cleary Gottlieb Steen &
Hamilton LLP
New York City

Mark S. Perwien (Invited)
Senior Advisor to the Industry Director Enterprise Activities (Financial Products)
Large Business and International (LB&I)
Internal Revenue Service
New York City

Elena V. Romanova
Head of ICG and Consumer Tax Advisory
Citigroup
New York City

Steven M. Rosenthal
Senior Fellow
Urban-Brookings Tax Policy Center
Washington, D.C.

Filiz A. Serbes (Invited)
Special Counsel to the Associate Chief Counsel (Corporate)

**Internal Revenue Service
Washington, D.C.**

**Michael B. Shulman
Shearman & Sterling LLP
Washington, D.C.**

**Krishna P. Vallabhaneni (Invited)
Deputy Tax Legislative Counsel
Office of Tax Policy
U.S. Department of the Treasury
Washington, D.C.**

**Karl T. Walli (Invited)
Senior Counsel (Financial Products)
U.S. Department of the Treasury
Washington, D.C.**

**Helen Yanchisin
Deloitte Tax LLP
Washington D.C.**

**Bret York (Invited)
Attorney-Advisor (Tax Legislation)
Office of Tax Legislative Counsel
U.S. Department of the Treasury
Washington, D.C.**

Program Attorney: Stacey L. Greenblatt

U.S. House of Representatives

COMMITTEE ON ETHICS

Washington, DC 20515

January 9, 2017

Ms. Viva Hammer
Joint Committee On Taxation
1622 Longworth House Office Building
Washington, DC 20515

Dear Ms. Hammer:

Pursuant to House Rule 25, clause 5(d)(2), the Committee on Ethics hereby approves your proposed trip to New York, New York, scheduled for January 16 to 17, 2017, sponsored by the Practising Law Institute.

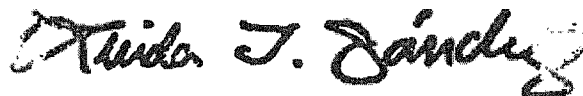
You must complete an Employee Post-Travel Disclosure Form (which your employing Member must also sign) and file it, together with a Sponsor Post-Travel Disclosure Form completed by the trip sponsor, with the Clerk of the House within 15 days after your return from travel. As part of that filing, you are also required to attach a copy of this letter and both the Traveler and Primary Trip Sponsor Forms (including attachments) you previously submitted to the Committee in seeking pre-approval for this trip. If you are required to file an annual Financial Disclosure Statement, you must also report all travel expenses totaling more than \$375 from a single source on the "Travel" schedule of your annual Financial Disclosure Statement covering this calendar year. Finally, Travel Regulation § 404(d) also requires you to keep a copy of all request forms and supporting information provided to the Committee for three subsequent Congresses from the date of travel.

If you have any further questions, please contact the Committee's Office of Advice and Education at extension 5-7103.

Sincerely,



Susan W. Brooks
Chairwoman



Linda T. Sanchez
Ranking Member

SWB/LTS:re