



PROFESSIONAL LIABILITY UNDERWRITING SOCIETY

PLUS Transactional Risk Webinar Series Tax Insurance

July 27, 2016

Presented by PLUS Diamond Sponsors





Meet the Presenters

MODERATOR:

Nancy Adams, Partner, Mintz Levin

PANELISTS:

Gary Blitz, Senior Managing Director, Aon Transaction Solutions

David De Barry, Chief Executive Officer, Concord Specialty Risk

Hugo Webb, Underwriting Manager – Tax, Ambridge Europe Limited



PLUS Transactional Risk Webinar Series

- May 11* The Rise Of Transactional Risk Insurance
- May 25* Basic M&A Concepts I
- June 1* Basic M&A Concepts II
- June 15* Underwriting Reps & Warranties I
- June 22* Underwriting Reps & Warranties II
- July 13* Reps & Warranties: Claims, Trends and Process
- July 27 Tax Insurance
- August Market Standards, Unique and Hard to Place Risks and Exposures

- Archived and available for viewing on the PLUS Website Multimedia Page



The information and opinions expressed by our panelists today are their own, and do not necessarily represent the views of their employers or of PLUS. The contents of these materials may not be relied upon as legal advice.

A copy of the presentation slides will be available following this webinar, on the PLUS website at: www.plusweb.org

What is tax insurance?

History of Tax Insurance

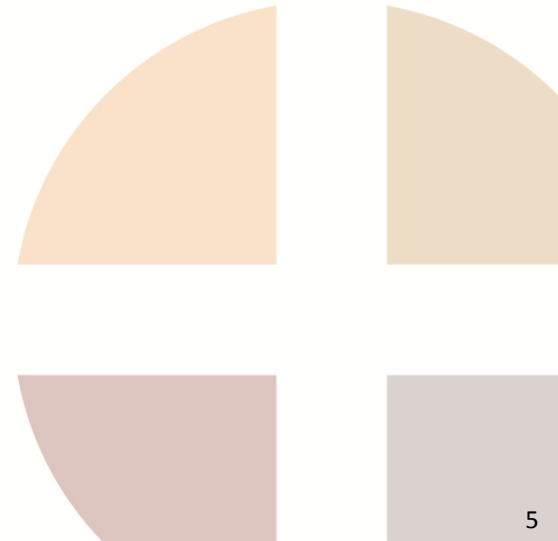
What loss is covered?

What types of risks are covered?

- Interpretation Risk
- Facts and Circumstances Risks
- Other – change in law, recapture

Geographies

Size of the Market



M&A Transactions

- Distinguish R&W/W&I insurance

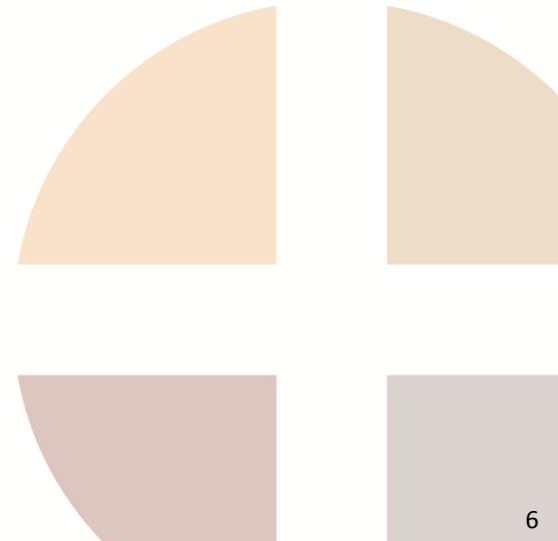
Real Estate Transactions

Corporate risk management (No transaction)

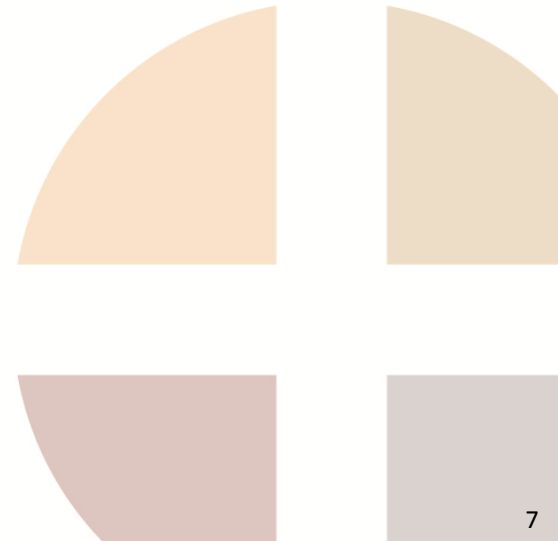
Tax credit transactions

Types of insureds

- Private equity
- Global 1000 corporations
- Tax equity investors



- Allocate risk among buyer and seller/minimize escrow
- Substitute for PLR or advance tax clearance
- Risk management

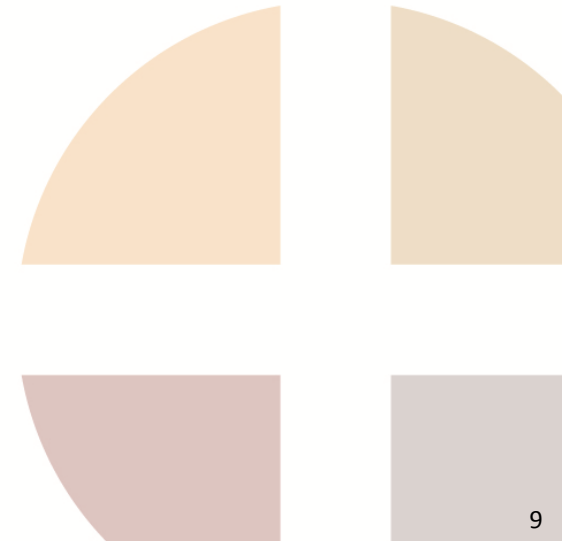


- Tax-free transactions (spin offs, reorganizations)
- S Corporations
- NOLS
- REITs / FIRPTA
- Tax Credits
- Transfer Pricing
- Non- US examples
- Many other issues

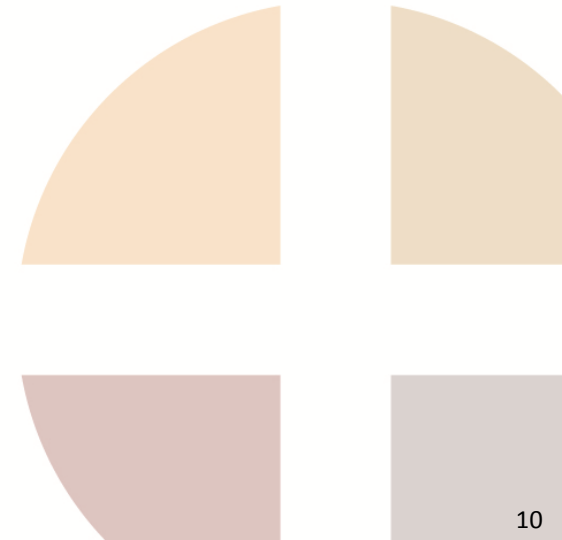
What is Not Coverable: Tax Shelters “Reportable and Listed Transactions”

- Note: Tax insurance on non-tax shelters does **not** require reporting under tax shelter regs

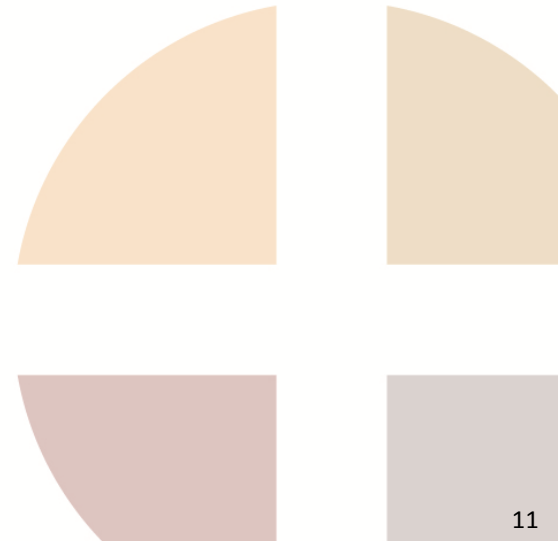
- What is the process to obtain tax insurance?
- How long does it take?
- When is it best to start the process?
- Role of the broker



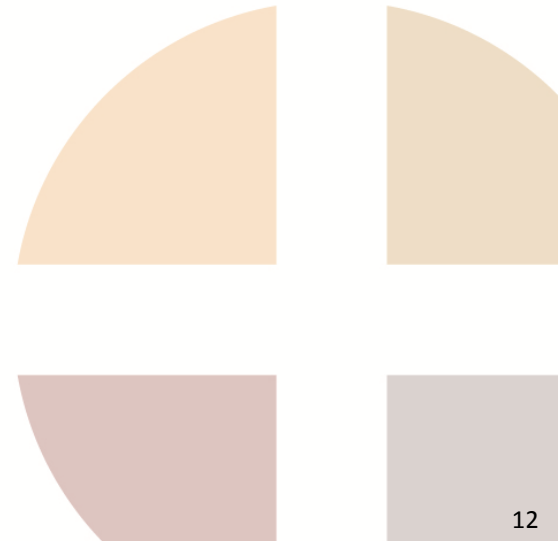
- Claims experience on tax insurance policies
- Unique issues to tax insurance claims
- Case studies



Case Studies



Questions





MODERATOR:

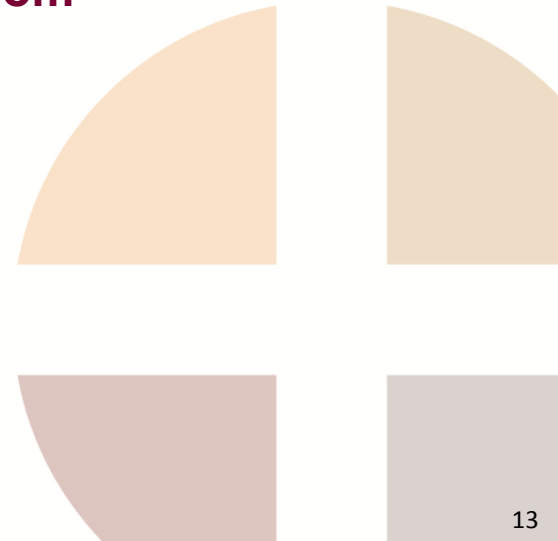
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Thank you, PLUS Diamond Sponsors





Thank you for your time.

**A replay of this webinar will be
available to PLUS Members at:**

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