



OFFICE OF  
CHIEF COUNSEL

DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
1111 Constitution Avenue N.W.  
Washington, DC 20224

**AGENDA**

**PUBLIC HEARING ON PROPOSED REGULATIONS**

**Transactions With Foreign Trusts and  
Information Reporting on Transactions  
With Foreign Trusts and Large Foreign  
Gifts**

**[REG-124850-08]**

**IRS Auditorium/Teleconference  
Wednesday, August 21, 2024  
10:00 am**

**INTERNAL REVENUE SERVICE**

S. Eva Wolf, Senior Attorney

Lara A. Banjanin, Senior Counsel

**DEPARTMENT OF THE TREASURY**

Natalie Punchak, Attorney-Advisor, OTP

## LIST OF SPEAKERS

### **PUBLIC HEARING ON PROPOSED REGULATIONS**

**Transactions With Foreign Trusts and Information Reporting on Transactions  
With Foreign Trusts and Large Foreign Gifts  
[REG-124850-08]**

**Date:** Wednesday, August 21, 2024  
**Time:** 10:00 a.m.  
**Place:** IRS Auditorium  
1111 Constitution Avenue, NW  
Washington, DC 20224

IRS Teleconference

**Teleconference Number: 877-226-8189**  
**Access Code: 854443**

The persons below have requested to present oral testimony on proposed regulations regarding “**Transactions With Foreign Trusts and Information Reporting on Transactions With Foreign Trusts and Large Foreign Gifts**” (REG-124850-08). A notice of proposed rulemaking and a notice of hearing were published in the **Federal Register** on Wednesday, May 8, 2024. Each speaker or group of speakers is allocated 10 minutes to speak.

#### In-Person Speakers

| <u>NAME</u>                           | <u>REPRESENTING</u>                                  |
|---------------------------------------|--|
| 1. Gary Carter                        | Self   |
| 2. Henry P. Alden II<br>Karen Brodsky | American Institute of CPAs (AICPA)                   |
| 3. Kevin Matz                         | American College of Trust and Estate Counsel (ACTEC) |

### **Telephonic Speakers**

- |                    |   |
|--------------------|---|
| 4. Dennis Haszho   | Self                                    |
| 5. Rebecca Lammers | Democrats Abroad                        |
| 6. John Richardson | Stop Extraterritorial American Taxation |

## **Agenda (attachment)**

The hearing is open to the public and other individuals who would like to attend. However, the Internal Revenue Service will not admit anyone who does not present the proper identification. Because of the controlled access restrictions, visitors cannot be admitted beyond the immediate entrance area of the Internal Revenue Service building until 9:30 a.m. ET. Attendees who wish to join the hearing telephonically must use the teleconference phone number and the access code on page 2 of this document.

Copies of the agenda can be found on the Regulations.gov website by entering the regulation number (REG-124850-08) into the Search field and selecting Supporting Materials.

The outlines of oral comments are at the following website: [www.Regulations.gov](http://www.Regulations.gov). Enter the regulation number (REG-124850-08) into the search box on Regulations.gov.

An unofficial transcript may be completed for this public hearing. To receive copies of the transcripts, please contact Tax Analysts at [research.help@taxanalysts.org](mailto:research.help@taxanalysts.org) or by phone at 800-955-2444.