

**Product Tax Seminar Moderator/Presenter biographies (alphabetical by last name):**

**John T. Adney, J.D.**

**Partner**

**Davis & Harman LLP**

John T. Adney, J.D., has been a partner in the Washington, D.C. law firm of Davis & Harman LLP since 1985, practicing taxation and insurance law. His practice focuses on the Federal income taxation of life insurance, annuities, long-term care insurance, the business uses of insurance products and life insurance company taxation. Adney represents clients, including coalitions of life insurers, before Congress, the Treasury Department, and the Internal Revenue Service. He is a past chair of the Committee on Insurance Companies of the American Bar Association's Section of Taxation. Adney has also served as a member of the Council of the Society of Actuaries' (SOA) Taxation Section, as a member of the Editorial Board of the SOA Taxation Section's newsletter, *Taxing Times* and as an associate editor of the *Journal of Financial Service Professionals*.

He is co-author of *Life Insurance & Modified Endowments* (2nd edition, Society of Actuaries 2015), is co-editor and a contributing author of the *Annuities Answer Book 5th Edition* (Wolters Kluwer 2017) and is a frequent contributor to *Taxing Times*. He is chair *emeritus* of the Board of Trustees of his *alma mater*, Millikin University (Decatur, Illinois).

**Rebecca Baxter**

**IRS Office of Chief Counsel**

**Art Dunlavy**

**Manager**

**Ernst & Young LLP**

Art Dunlavy is a manager in the Insurance and Actuarial Advisory Services practice of Ernst & Young LLP's Financial Services Office, based in Hartford, CT. A graduate of the University of Massachusetts, he has over 25 years of experience in the life insurance industry. His experience includes pricing and management of life and annuity product lines, administration and illustration system development and in-force management of various life insurance products. Dunlavy spent the last 15 years as a consultant to the life insurance industry, specializing in designing life insurance product tax compliance systems, remediation of non-compliant contracts and systems, and a wide array of administration system implementations and conversions. He has spoken at industry seminars on topics including product tax compliance and policy and administration system remediation.

**Steve Feldman, J.D., LL.M.**

**Associate General Counsel**

**New York Life Insurance Company**

Steve Feldman, J.D., LL.M., is an associate general counsel at New York Life Insurance Company. He joined New York Life in 1991.

Mr. Feldman's practice concentrates on a variety of tax issues, with an emphasis in taxation of employee benefits (including deferred compensation under IRC section 409A), state and local taxation of insurers, insurance product taxation and withholding and information reporting.

He graduated *magna cum laude* with a B.A. in political science from Yeshiva University in 1982. He earned a J.D. from Benjamin N. Cardozo School of Law in 1985, where he was a member and notes and comments editor of the *Cardozo Law Review*. Mr. Feldman earned an LL.M. in taxation from New York University Law School, Graduate Division, in 1990.

Prior to joining New York Life Insurance Company, he was an associate at Fried, Frank, Harris, Shriver & Jacobson and at Spengler, Carlson, Gubar, Brodsky and Frischling and an attorney in the law department at The Prudential Insurance Company of America.

**Philip Ferrari, ASA, MAAA**  
**Executive Director**  
**Ernst & Young LLP**

Philip Ferrari, ASA, MAAA, is an executive director in the insurance and actuarial advisory services practice of Ernst & Young LLP's Financial Services Office. He is based in the firm's Hartford office. Prior to joining Ernst & Young, Ferrari was a vice president and consulting actuary with an actuarial consulting firm.

Ferrari brings more than 17 years of experience providing actuarial and operational consulting services for the insurance industry, including: end-to-end insurance company operational analysis, product design and development, systems implementation and conversion, taxation and reporting/withholding analysis and process risk analysis/control development. He has over 10 years of experience in insurance and annuity product taxation, including reporting and withholding requirements. Ferrari has also served as the EY engagement lead for many FATCA (Foreign Account Tax Compliance Act) transformations impacting the entire insurance business chain - from front-end new business processing, through policy administration, and back-end tax reporting and withholding operations.

**Robert A. Fishbein, J.D., LL.M.**  
**Vice President & Corporate Counsel, Tax Law**  
**Prudential Financial**

Robert A. Fishbein, J.D., LL.M., is a vice-president and corporate counsel with Prudential Financial, Inc., Newark, NJ, where he leads the product tax, legislative and actuarial functions in the corporate tax department. Responsibilities include providing tax law advisory, product tax compliance and tax actuarial support with respect to the design, marketing, sale and administration of insurance, annuity, retirement and investment products, as well as supporting federal tax legislative and regulatory initiatives. He is chairman of the Committee of Annuity Insurers, a coalition of 28 life insurance companies representing more than eighty percent of the annuity business in the United States.

Prior to joining Prudential in 1997, Fishbein was associated with McCarter & English, LLP, Newark, NJ and specialized in tax and estate planning matters. He received his A.B. in philosophy from Vassar College in 1983, his J.D. from Washington University in 1986 and his LL.M. in taxation law from Georgetown University in 1987. He is a member of the New Jersey, New York and District of Columbia Bars.

Fishbein is a frequent speaker and author on tax, retirement and financial planning matters. His more recent articles include: "Where There's A Will---And More---There's Peace of Mind" (BPT Content, May 2016); "5 Changes To Watch For This Tax Season" (BPT content, February 2016); "Mid-Year Tax Planning Adjustments" (LifeHealth Pro, August 2015); "Same Sex Marriage and Planning Traps for the Unwary" (LifeHealth Pro, April 2015); "6 Model Behaviors for Tax Season" (BPT Content, March 2015); "Six Tips for Managing Your Year End Taxes" (BPT Content, December, 2014), "Life-Cycle Financial Planning" (IRI Retirement Planning Week Content,

April 2014); "Expert Tips for Navigating Tax-Season Changes" (BPT Content, March 2014); "Post-Windsor Planning Traps" (Best's Review, December 2013); "2013 Year End Tax Planning Tips" (IRS Insight, December 2013); "The Biggest Retirement Planning Mistakes" (ARA Content, March 2013); "The New 2013 Taxes: The Good, the Bad and the Ugly" (LifeHealthPro, March 2013).

**Sheryl Flum**  
**Managing Director**  
**KPMG**

Sheryl Flum is a managing director in the financial services tax practice of KPMG Washington National Tax. She has over 15 years of experience in the technical aspects of insurance law. Flum previously served as chief of the insurance branch within the Financial Institutions and Products office of the Office of Chief Counsel of the Internal Revenue Service. As the branch chief, she was responsible for tax law implementation, tax law interpretation and focusing on new and emerging issues in insurance tax. She is experienced with providing IRS guidance on issues that have a broad impact on insurance company taxpayers or on those who purchase insurance products and captive insurance company issues. Flum has experience with IRS examination audits of insurance companies, private letter rulings on the federal tax treatment of proposed transactions and new insurance products, closing agreements between life insurance companies and the IRS, and change in method of accounting requests related to Subchapter L issues. She is a frequent public speaker on insurance tax matters at many insurance tax related programs, including programs sponsored by American Bar Association, Federal Bar Association, Insurance Tax Conference and Society of Actuaries (SOA).

**John Glover**  
**Senior Counsel**  
**IRS Office of Chief Counsel**

**Mark E. Griffin, J.D.**  
**Partner**  
**Davis & Harman LLP**

Mark E. Griffin, J.D., has been providing Davis & Harman LLP clients with expertise in taxation and insurance law since 1988. He specializes in the federal income tax treatment of life insurance and annuity contracts. His practice area encompasses the federal tax treatment of annuity contracts issued as nonqualified annuities, as well as in connection with IRAs, section 403(b) arrangements, qualified retirement plans and structured settlement arrangements. His work with life insurance contracts includes modified endowment contracts, corporate-owned life insurance contracts, and split-dollar life insurance arrangements.

Prior to joining Davis & Harman, Mark served as Attorney-Advisor at the US Tax Court. He also speaks and writes frequently on the federal income taxation of insurance products. He is a co-author of Income tax Definition of Life Insurance and Annuity Contracts (BNA Tax Management Portfolio 528) and Income Taxation of Life Insurance and Annuity Contracts (BNA Tax Management Portfolio 529), and a contributing author to the Annuities Answer Book (Panel Publishers, 3d ed. 2000).

He received his BA, magna cum laude, from Hamilton College in 1981 and his JD, cum laude, from Syracuse University in 1984. He was awarded an LLM in Taxation from Georgetown University Law Center in 1988. Mark is a member of the District of Columbia Bar. He is a member of the American Bar Association Section of Taxation and is a member and former officer of the Federal Bar Association Section of Taxation.

**Lawrence M. Hersh, FSA, MAAA**

**Assistant Vice President  
Pacific Life Insurance Co.**

Lawrence M. Hersh, FSA, MAAA, is an assistant vice president with Pacific Life, with extensive experience in life insurance pricing, product design and taxation. His focus is on life insurance policyholder taxation under sections 7702, 7702A and 7702B of the Internal Revenue Code. His work includes reviewing and designing life insurance products, the development of administrative systems and procedures and policyholder tax reporting.

Hersh has a master's degree in statistics from Columbia University, is a Fellow of the Society of Actuaries (SOA) and a member of the American Academy of Actuaries. He is currently the co-editor of *Taxing Times*, the SOA's Tax Section newsletter.

**Kay Hossofsky  
IRS Office of Chief Counsel**

**Samera Kadry  
Lincoln Financial Group**

**Bryan W. Keene, J.D.  
Partner  
Davis & Harman LLP**

Bryan W. Keene, J.D., earned a B.S. from the University of Florida (1994), and J.D., *with honors*, from the University of Florida (1998) is a member of the District of Columbia Bar, the Florida Bar, the American Bar Association (Section of Taxation) and the Federal Bar Association (Taxation Section). He also serves on the Board of Governors for the Association of Life Insurance Counsel (2017–2020), is a former chair of the Insurance Companies Committee of the American Bar Association's Section of Taxation and chair of the Taxation Section of the Association of Life Insurance Counsel. Keene also is a contributing author to the *Annuities Answer Book* (5th edition, 2017) and a frequent speaker and writer on federal income tax issues affecting life insurance and annuity products.

**Brian G. King, FSA, MAAA  
Executive Director  
Ernst & Young LLP**

Brian King, FSA, MAAA, is an executive director with Ernst & Young, LLP. He serves many life insurance company clients. Specifically, he addresses matters relating to tax compliance of life insurance products in general, with a focus on the tax compliance of life insurance under the requirements of section 7702 and 7702A of the Internal Revenue Code. King spent the past 24 years as a consultant serving the life insurance industry and is actively involved with the Taxation Section of the Society of Actuaries, serving on the editorial board of the Section newsletter *Taxing Times*.

He is co-author of the first and second editions of *Life Insurance & Modified Endowments under Internal Revenue Code Sections 7702 and 7702A* (Society of Actuaries 2004 and 2015), a contributing author of the *Annuities Answer Book 5th Edition* (Wolters Kluwer 2017), and is a frequent contributor to *Taxing Times*.

King is a frequent speaker at seminars and conferences, including meetings of the Society of Actuaries and various regional actuarial clubs. An honors graduate of the University of Connecticut, with a Bachelor of Science

degree in mathematics, he is a Fellow of the Society of Actuaries and a member of the American Academy of Actuaries.

**Eric G. Lanning, LL.M**  
**Vice President and Senior Counsel**  
**Lincoln National Life Insurance Company**

Eric G. Lanning, LL.M, focuses his practice entirely on general corporate and insurance company tax matters (U.S. and international) taxation of insurance and annuity products, taxation of innovative investments, state and local tax law (including insurance premium tax and unemployment tax issues), the application of federal estate and gift tax laws and state inheritance tax law to insurance products, taxation of trusts, regulated investment companies and partnerships, tax reporting and withholding, taxation of deferred compensation plans, IRAs, and SEPs, and general tax issues, including corporate travel and entertainment expenditures, settlements, and tax employment status.

Lanning supports Lincoln's corporate tax department in managing active tax controversies and requests for guidance from the Internal Revenue Service and the Treasury Department. He also assists the tax Department in managing tax audits and hearings before governmental agencies. Lanning served as the chair of the ACLI Product Taxation Federal Committee.

He received his bachelor's degree in psychology in 1996 from the University of Michigan and his law degree in 1999 from the Indiana University School of Law – Bloomington. He earned an LL.M. in taxation in 2007 from the Thomas M. Cooley School of Law. Eric is admitted to the State Bar of Michigan.

**Kimberly W. Lunn, J.D., LL.M**  
**Assistant General Counsel & Assistant Secretary**  
**Northwestern Mutual**

**Casey Edward Malone, FSA, CERA, MAAA**  
**Consulting Actuary**  
**Milliman Inc.**

Casey Edward Malone, FSA, CERA, MAAA, is a consulting actuary in the life practice of Milliman's Seattle office. He joined the firm in 2011. Casey has over 15 years of industry experience, and he has worked extensively in pricing, valuation, ALM, and ERM for immediate, fixed deferred, fixed indexed, and variable annuities. His current areas of focus are financial reporting and enterprise risk management with a particular interest in model governance and economic capital.

**Kristin R. Norberg, ASA, MAAA**  
**Director - Actuarial Tax**  
**Symetra**

Kristin Norberg, ASA, MAAA, is director - Actuarial Tax with Symetra in Bellevue, WA. At Symetra, she is responsible for both product tax and tax reserve compliance and provides technical support on other federal income tax matters. She was previously with Ernst & Young LLP in their Chicago and Washington, D.C. offices, serving clients on actuarial, tax, regulatory and systems aspects of life, annuity, health and property & casualty products. Prior to EY, Norberg worked for the life insurance companies of Sammons Financial Group, providing actuarial guidance to the product implementation, policy administration and policyholder tax compliance functions. She is a former member of the Taxation Section Council of the Society of Actuaries (SOA), former

editor and current editorial board member of the section's newsletter *Taxing Times* and a frequent presenter in actuarial tax-related sessions at professional conferences.

**Mandana Parsazad, LL.M.**  
**Vice President**  
**ACLI**

Mandana Parsazad, LL.M., is vice president at the American Council of Life Insurers (ACLI) where she represents life insurance industry's interests before Internal Revenue Service, Treasury Department's Office of Tax Policy. She also serves as technical advisor to Federal Relations Department at ACLI on life insurance products, and international tax issues.

Parsazad has she provided a broad range of counseling, advocacy and negotiation services to multinational corporate clients throughout her legal career. She has worked in Deloitte & Touche's International Tax Group in Washington D.C. and Baker & Hosteltler's Washington D.C. office, where she advised numerous businesses and multinational corporations on U.S. income tax issues. Parsazad also served as senior policy advisor to U.S. Senator Mark Dayton on tax and economic issues.

She graduated with a degree in philosophy from the University of Massachusetts and earned a law degree from Tulane University School of Law and LL.M.s in taxation, and in International and Comparative Law from Georgetown University Law Center.

**Alison R. Peak, J.D.**  
**Partner**  
**Davis & Harman LLP**

Alison R. Peak, J.D., is a partner in the Washington, DC, law firm of Davis & Harman LLP. Ms. Peak advises clients on a wide range of issues relating to insurance products and company taxation. Her practice focuses on the federal tax treatment of variable and fixed annuities, life insurance contracts, and IRAs, by providing advice on the design, implementation, and compliance of these products. She also advises clients on tax withholding and reporting obligations related to insurance contracts and IRAs and the tax treatment of insurance company separate accounts, including issues relating to diversification and investor control. In addition, Ms. Peak represents clients before the Internal Revenue Service obtaining private letter rulings and closing agreements on insurance tax matters. Ms. Peak frequently publishes articles regarding the taxation of life insurance and annuity products and she often speaks at various industry conferences. Ms. Peak is a member of the District of Columbia Bar, the New York Bar, and the American Bar Association, Section of Taxation. Prior to joining Davis & Harman LLP, Ms. Peak graduated from Georgetown University Law Center's LL.M tax program, with Distinction, where she received the Thomas B. Chetwood, SJ, Prize for Highest Academic Average. She received her J.D., cum laude, from the Washington College of Law at American University.

**Chris Phanco, J.D., M.B.A., LL.M**  
**Assistant Vice President, Tax Counsel**  
**Pacific Life Insurance Co.**

Chris Phanco, J.D., is assistant vice president, tax counsel, in the law department of Pacific Life Insurance Company in Newport Beach, California. He is responsible for overseeing the tax aspects, including qualification and compliance, of the company's life insurance and annuity products as well and the company's tax reporting and withholding. Other

responsibilities include providing counsel on tax and ERISA matters for the company's qualified and non-qualified benefit plans.

Phanco is an active member of the California State Bar Association and many tax and insurance industry groups including serving as a past chairman of the American Council of Life Insurers (ACLI) Product Tax Committee. He has spoken at various industry conferences, including presentations at the Federal Bar Association's Insurance Tax Seminar, the Insurance Tax Conference, the ACLI Annual Meeting and the American Bar Association Tax Section Meeting.

Prior to his work as Tax Counsel for Pacific Life, Phanco spent several years in the advanced sales area, educating insurance professionals and financial advisors on matters of business and estate planning.

Chris received his B.A. from the University of California, Los Angeles, his J.D. and M.B.A. from Pepperdine University School of Law, and his LL.M. from the University of San Diego School of Law.

**Dan Phillips**  
IRS Office of Chief Counsel

**Andy Seydel, CPA**  
Senior Manager  
Ernst & Young LLP

Andy Seydel is a Des Moines-based senior manager in Ernst & Young's (EY) FSO tax practice. He has over 14 years of experience relating to life insurance and property and casualty insurance companies. He began his career in the audit practice with EY, focusing solely on the insurance industry. After working for three years in the private insurance industry, he re-joined EY in the FSO tax practice in 2013.

Seydel has extensive experience in the preparation and review of GAAP, IFRS, and Statutory provisions as well as deferred tax inventories, including SSAP 101 and ASC 740. He also has extensive experience with the process review and control testing regarding compliance with Sarbanes Oxley Section 404. He also has experience helping clients with the accounting and reporting implications of product tax non-compliance and remediation issues.

Seydel received his Bachelor of Art in accounting from Simpson College. He is a CPA, licensed in Texas and Iowa. Seydel is a member of the AICPA, Iowa Society of Public Accountants and Texas Society of CPAs. He serves on the board of the Iowa Taxpayers Association as well as the Iowa Chapter of the Cystic Fibrosis Foundation.

**Kathryn M. Sneade**  
IRS Office of Chief Counsel

**Craig R. Springfield, J.D., LL.M., M.S.**  
Partner  
Davis & Harman LLP

Craig R. Springfield, J.D., has been a partner with the Washington, D.C., law firm of Davis & Harman LLP since 1998 and specializes in the taxation of life insurance, annuities, health insurance, long-term care insurance and other insurance products. His practice includes representation of clients before the Internal Revenue Service, Department of the Treasury and on legislative matters. Springfield received his B.S.B.A., *magna cum laude*, and M.S. in accounting from the University

of Central Florida in 1985 and 1987, respectively, his J.D., *with honors*, from the University of Florida in 1990, and his LL.M. in Taxation from New York University in 1991.

He is co-author of *Life Insurance & Modified Endowments* (2nd edition, Society of Actuaries 2015), a contributing author of the *Annuities Answer Book* (5th edition, Wolters Kluwer 2017), and frequently speaks and writes on tax and insurance topics. Springfield is a member of the District of Columbia Bar and the American Bar Association Section of Taxation, where he previously served as chair of its Committee on Insurance Companies.

**Jeffrey Thomas Stabach, FSA, MAAA**  
**Manager**  
**Ernst & Young LLP**

Jeffrey Thomas Stabach, FSA, MAA, is a manager in the insurance and actuarial advisory services practice of Ernst & Young, and is based in the firm's Hartford office. He has over 15 years of experience in the actuarial field and has been with the firm since February of 2011. Prior to joining Ernst & Young, he was the associate director at a financial services company specializing in product development and pricing of individual life insurance. Stabach has extensive experience in various areas including Sections 7702 and 7702A policyholder taxation. He specializes in helping clients deal with the administration complexities of product tax compliance and remediation.

**Daniela Stoia**  
**Partner**  
**Davis & Harman LLP**

Daniela Stoia is a partner with Davis & Harman LLP, specializing in insurance product tax matters. Her practice concentrates on various life insurance contract compliance issues. Since 1998, she has represented clients in over 100 proceedings with the IRS to obtain relief for life insurance contracts that fail to comply with applicable federal income tax laws (such as failures to comply with Internal Revenue Code sections 101(f), 7702, and 7702A) as well as reporting failures. Drawing on this experience, Stoia and others in the firm submitted comments in response to IRS Notice 2007-15 recommending that changes be made to the correction procedures for "failed life insurance contracts" and "inadvertent MECs." This was done in order to address the insurance industry's concerns about the amounts due under such procedures and the administrative burdens such procedures placed on taxpayers. In addition, since the release of the new correction procedures in 2008, she has spoken before numerous groups about these procedures and has represented clients seeking relief under these procedures.