



U.S. International Tax Course | August 8-12, 2022 | Atlanta, GA

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2022 U.S. International Tax Course

The Institute's tradition of excellence in continuing education dates to its founding in 1944. We encourage you to send your emerging tax professionals to TEI's 2022 U.S. International Tax Course! The 2022 edition of the Course will return to in-person instruction to enhance the benefits to attendees, including the opportunity to network with fellow in-house, international tax professionals. Registration is now open at www.tei.org.

The Georgia Tech Hotel & Conference Center in Atlanta will once again host the program, which will take place from August 8-12, 2022.

The week-long course builds upon the Institute's success in educating tax professionals on the fundamentals, challenges, and opportunities present in U.S. international taxation, and is relevant to professionals working for both U.S. and non-U.S. headquartered companies. Designed for in-house tax professionals with five or fewer years of experience in U.S. international tax matters, the course covers the central concepts of the U.S. taxation of multi-national enterprises, including sessions addressing:

- ▶ Sourcing of income and expenses
- ▶ The U.S. foreign tax credit
- ▶ Transfer pricing under section 482
- ▶ FATCA and other withholding and reporting requirements
- ▶ The U.S. subpart F regime

From a world-class faculty, a practical and succinct perspective, to a reasonable price, not to mention excellent facilities, the U.S. International Tax Course is a regular highlight of the Institute's continuing education calendar. Because enrollment is limited and applications will be processed on a first-come, first served basis, you or your colleagues should register soon to ensure participation in this one-of-a-kind program, which has sold out for many years.



2022 U.S. International Tax Course

Time (ET)

Sunday, August 7

5:00 - 7:00 pm

Registration

Monday, August 8

7:30 - 8:15 am

Continental Breakfast

7:30 - 8:15 am

Registration

8:15 - 8:30 am

Welcome & Opening Remarks

8:30 am - 12:30 pm

Development of International Tax Law & Policy

David Berke, Joshua Rabon | Skadden Arps Slate Meagher & Flom LLP

Lunch

12:30 - 1:30 pm

Sections 861-863: Sourcing Income & Expenses

Anna Voortman, Stacy Wabeke | Ernst & Young LLP

1:30 - 5:00 pm

Welcome Dinner

Tuesday, August 9

7:30 - 8:30 am

Continental Breakfast

8:30 am - 12:00 Noon

Foreign Tax Credit

Young Choi, Samuel Pollack and Julia Skubis Weber | Baker McKenzie

12:00 Noon - 1:15 pm

Lunch

1:15 - 3:15 pm

Inbound Issues: U.S. Taxation of Nonresident Companies

Michael Bruno, Steve Hadjiligiou | McDermott Will & Emery LLP

3:30 - 5:30 pm

Foreign Currency Issues, including Section 987

Tim Kerr, Bob Leonard | Ernst & Young LLP



Wednesday, August 10

8:00 - 8:30 am	Continental Breakfast
8:30 - 10:30 am	FATCA, Withholding Tax and Other Reporting Requirements for Foreign Investments Laurie Hatten-Boyd, Kelli Wooten KPMG LLP
10:45 am - 12:00 Noon	Subpart F and GILTI Adam Halpern, William Skinner Fenwick & West LLP
12:00 Noon - 1:15 pm	Lunch
1:15 - 3:15 pm	Subpart F and GILTI (Cont.)
3:30 - 5:30 pm	Earnings & Profits Michael Medley, Paul Wagoner Deloitte Tax LLP

Thursday, August 11

8:15 - 8:45 am	Continental Breakfast
8:45 - 10:30 am	Sections 367 and 7874: International Reorganizations & Inversions Michael Cardella, Jeff Romero Skadden Arps Slate Meagher & Flom LLP
10:45 am - 3:30 pm	Section 482, BEPS, and Foreign Tax Regimes J. Brian Davis, Nicholas Mowbray BakerHostetler
12:00 Noon - 1:30 pm	Lunch
3:45 - 5:30 pm	Documentation and Information Reporting from Foreign Affiliates (Including Forms 5471 and 5472) Kristina Reynolds, Brendan Sinnott, Alvarez & Marsal Taxand, LLC
5:30 - 6:30 pm	Reception

Friday, August 12

8:00 - 8:30 am	Continental Breakfast
8:30 am - 12:00 Noon	Bringing It All Together: Structuring of Foreign Transactions & Operations to Minimize the Corporate Tax Burden Jason Gritton, Michael Thompson Deloitte Tax LLP
12:00 Noon	Adjourn





2022 U.S. International Tax Course

GENERAL INFORMATION

Eligibility

This course is limited to members of TEI and other in-house tax professionals. (Individuals engaged in private law, accounting, or other consulting practice are ineligible to attend). No partial or split registrations are permitted. Registration forms without payment will not be processed by TEI.

Format

This course will feature a combination of lectures and open discussions. Detailed outlines of each session and other supplementary materials will be provided to students upon their arrival. Pens, pencils, highlighters, and notepaper will not be provided. Casual attire is suitable for all educational sessions and other functions. The classrooms are air conditioned, so a light sweater may be appropriate.

Applications

Enrollment is limited and registrations will be accepted on a first-come, first-served basis. Applicants are encouraged to register at www.tei.org. The application should be typed; if TEI is unable to read the application, its processing may be delayed. Use of the U.S. Postal Service's overnight mail is acceptable. Other overnight mail services (such as FedEx) will not deliver to TEI's P.O. Box. Because of TEI's lockbox procedures, applications should not be sent to TEI's street address.

Students will receive an email confirmation upon their acceptance to the course. Should maximum enrollment be reached and TEI cannot accept your application, you will be notified immediately. If neither type of notice is received within two weeks of the date the course begins, it should be assumed that the application was not received by TEI.

An application will not be processed unless it is accompanied by payment, and no registrations will be taken over the telephone.



By web: www.tei.org. You must log in before registering.



By mail: Tax Executives Institute, Lockbox 9407 PO Box 70280, Philadelphia, PA 19176-0280. Send registration form with check or credit card information.



By fax: **202.638.5607**. Credit card registrations only. VISA, MasterCard, American Express, Diners Club, and Discover only.



By email: Scan and send completed registration form with credit card to meetings@tei.org.

Applications should be completed in full. The requested information will be used to comply with continuing education requirements established by state CPA and bar associations as well as federal antidiscrimination rules.

Cancellations

All cancellations must be made in writing by July 22, 2022, and will be subject to an administrative service charge of \$75 (U.S.); for cancellations after July 22, 2022, and before July 29, the charge will be \$200 (U.S.). No refunds will be made for cancellations requested after July 29, 2022, or for no-shows. TEI encourages registrants or their employers to send a substitute to avoid this cancellation penalty. Cancellations must be requested by email to meetings@tei.org. Refunds of credit card registrations, less administrative charge, will be made to the purchaser's credit card account. TEI's Federal Taxpayer ID Number is 52-0239291.

Substitution Policy

Substitutions will be permitted for registrants who are unable to attend the course. To request a substitution, please email meetings@tei.org with the names of the registrant and his or her substitute. The substitution fee is \$50 per registrant.

Cancellation or Over-subscription of the Course

In the event the conference must be canceled or is oversubscribed, TEI's liability is limited to the subscription of the Course return of the registration fee.

Financial Aid for Illinois Licensed Attorneys

Scholarships to defray tuition expense for this program are available for in-house tax professionals Licensed Attorneys (both TEI members and nonmembers) who are temporarily unemployed and who are Illinois licensed attorneys with a demonstrated financial hardship. Scholarships will be reviewed and provided upon application on a case by case basis. Attorneys who qualify will receive at least a 50% reduction in the conference fee (which does not include any reduction or reimbursement for meals, lodging, or travel costs associated with the seminar). To request information on whether you might qualify, please contact us at meetings@tei.org.

Atlanta, Georgia



2022 U.S. International Tax Course

GENERAL INFORMATION - CONTINUED

Arrival, Check-in and Materials Pick up

The course runs from Monday morning to Friday afternoon. All participants should plan to arrive Materials Pick up on campus on Sunday afternoon to check into hotel. Course materials may be picked up between 5:00 - 7:00 pm on Sunday. Registrants arriving after this time may pick up course materials Monday morning from 7:30-8:50 am.

Dining and Activities

The \$2,300 course fee covers all program materials and course-related activities; lodging Sunday through Friday afternoon, a welcome dinner on Monday, breakfast and lunch on Monday through Thursday, and the closing reception Thursday evening (no lunch Friday). The participant is responsible for all other expenses, including dinner on Tuesday, Wednesday, and Thursday.

Facilities

Classes will be held at the Georgia Tech Hotel and Conference Center. The facility is a self contained conference center and hotel with lodging, dining, and meeting rooms. The sleeping rooms are equivalent to those in a business hotel. Georgia Tech University is located in Atlanta, where there are many restaurants, shops, theaters, and museums.

- ▶ Georgia Tech University has on-site recreational facilities including swimming, tennis, and weight and aerobic training
- ▶ Hartsfield Jackson Atlanta International Airport (ATL) is 15 miles from the Georgia Tech Hotel and Conference Center.
- ▶ Valet Parking (upon request) starting at \$22 per day
- ▶ Ample Self Parking (1,500 space parking garage connected to hotel) \$18 for unlimited in/out access. Prices subject to change.
- ▶ Attendees are responsible for all transportation costs.

Georgia Tech Hotel and Conference Center, 800 Spring St. NW, Atlanta, Georgia. Phone: (404) 347-9440.

Recording Devices

The use of tape or digital recorders in the classroom is prohibited. Please silence all devices upon entering the meeting room.

Questions?

Call TEI at 202.638.5601, email to meetings@tei.org or visit www.tei.org. Click on "Events & Education".





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Please check here if you require special accessibility or assistance at this function. We will contact you.

ELIGIBILITY

TEI events are open to members of TEI and other in-house tax professionals. Individuals engaged in private law, accounting, or other consulting practice, as well as government employees, are ineligible to attend.

FEES

Amount (U.S. Funds)

\$2,300 1st Registrant

\$2,100 1st Registrant
No Lodging

\$2,100 Subsequent
Registrant

Name of first registrant

\$1,800 Subsequent
Registrant
No Lodging

Name of first registrant

TOTAL CHARGE:

REGISTRATION FORM

Fee covers course materials and other items specified in course announcement. Applications will be accepted on a first-come, first-served basis. Applicants are encouraged to register via www.tei.org. Credit card registrations may be faxed to 202.638.5607 or scanned and emailed to: meetings@tei.org. If registering by check, make checks payable to Tax Executives Institute and mail to Tax Executives Institute, Lockbox 9407 PO Box 70280, Philadelphia, PA 19176-0280. **Do not mail applications to TEI's street address.** Questions? Call 202.638.5601 or email: meetings@tei.org.

Name

Nickname for Badge

Company

Mailing Address

City

State/Province

Zip/Zone

Telephone

Fax

Email

Charge to: VISA MasterCard American Express Discover Diners Club

Card Number

Exp. Date

Cardholder Name (print)

Signature

If faxing your registration using a credit card, please do so between 9:00 am and 4:00 pm ET to ensure confidentiality. Fax number for registrations and cancellations is 202.638.5607. This form can be scanned and emailed to meetings@tei.org.

All cancellations must be made in writing by July 22, 2022, and will be subject to an administrative service charge of \$75 (U.S.); for cancellations after July 22, 2022, and before July 29, the charge will be \$200 (U.S.). No refunds will be made for cancellations requested after July 29, 2022, or for no-shows TEI encourages registrants or their employers to send a substitute to avoid this cancellation penalty. Cancellations must be requested by email to meetings@tei.org. Refunds of credit card registrations, less administrative charge, will be made to the purchaser's credit card account. TEI's Federal Taxpayer ID Number is 52-0239291.

In accordance with section 274(n) of the Internal Revenue Code, registrants are notified that that the portion of the course registration fee attributable to food and beverage is \$400 (U.S.).



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COVID-19 SAFETY PROTOCOLS

COVID-19

TEI is pleased to welcome the in-house tax professional community back to in-person events! Our top priority remains the health and safety of our attendees, sponsors, speakers, and staff. By observing COVID-19 safety guidelines established by San Francisco and the Centers for Disease Control and Prevention, we believe that we, along with our partners at the San Francisco Marriott Marquis, can foster a safe, welcoming environment for our communities to share the experiences they rely on TEI to provide. Accordingly, attendees must agree to comply with all COVID-19 safety protocols established by TEI and the San Francisco Marriott Marquis.

As of April 1, San Francisco has aligned with the State of California's new guidance and no longer requires masks or proof of COVID-19 vaccination or a negative test to enter events. The city has stated it will continue to monitor public health data and that it maintains its authority to make any changes to local regulations, no matter what the State or other neighboring jurisdictions may choose to do.

Participants cannot attend the event if they are feeling unwell, have been in contact with someone who has tested positive for COVID-19 within seven days leading up to the event, or have displayed COVID-19 symptoms within 48 hours preceding the event. These symptoms may include fever or chills, coughing, shortness of breath, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, and diarrhea. If you cannot attend the event for any of these reasons, TEI's staff will work with you to transfer your registration to the following year's event or provide a full refund, at the attendee's choice. If an attendee becomes unwell during an event, he or she should not reenter the event space, but rather should immediately inform a TEI staff member via telephone or email, and we will work with the San Francisco Marriott Marquis to isolate the individual and seek medical attention as needed. If an attendee becomes unwell within the five days following the event, please notify TEI immediately by emailing meetings@tei.org.