



Virtual U.S. International Tax Course – Simulive Edition (2022) | January 11 – March 2, 2023 | Virtual Seminar

Virtual U.S. International Tax Course – Simulive Edition (2022)

PLANNING COMMITTEE:

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Tax Counsel, TEI

The U.S. International Tax Course – Simulive Edition 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. For the first time, this Course is offered in a Simulive format. The sessions will consist of a recording from the in-person 2022 conference with speakers on-hand live to answer questions and chat at the end of each session.

Designed for in-house tax professionals with five or fewer years of experience in U.S. international tax matters as well as those seeking for a refresher or cross-training 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

The sessions feature a world-class faculty, and a practical and succinct perspective presented as a virtual "Simulive Edition" of the in-person U.S. International Tax Course conducted in 2022. We are airing the sessions in a Simulive format, which means we will replay the recorded sessions from the seminar and will have session speakers on hand to answer questions through chat and a live Q&A at the end of the session. Each Simulive session will qualify for CPE credit depending on the length of the session, with approximately 36.0 CPE hours offered.

Simulive U.S. International Tax Course registrants will also receive on-demand access to the recorded sessions at the conclusion of the Simulive seminar on March 2, 2023. Please note that CPE is not available for on-demand viewing of the sessions.

January 11 – March 2, 2023 | Virtual Seminar

Connect. Engage. Impact.



Virtual U.S. International Tax Course - Simulive Edition (2022)

Time (ET)

Wednesday, January 11

11:00 am – 12:15 pm

Development of International Tax Law & Policy

1:00 – 2:15 pm

David Berke | Associate, Tax, Skadden, Arps, Slate, Meagher & Flom LLP

Joshua Rabon | Associate, Tax, Skadden, Arps, Slate, Meagher & Flom LLP

Thursday, January 12

11:00 am – 12:15 pm

Development of International Tax Law & Policy (Con't)

1:00 – 2:15 pm

David Berke | Associate, Tax, Skadden, Arps, Slate, Meagher & Flom LLP

Joshua Rabon | Associate, Tax, Skadden, Arps, Slate, Meagher & Flom LLP

Thursday, January 19

11:00 am – 12:15 pm

Sections 861-863: Sourcing Income & Expenses

1:00 – 2:15 pm

Christine Jones | International Tax Senior Manager, Ernst & Young LLP

Anna Voortman | International Tax Services, Ernst & Young LLP

Friday, January 20

11:00 am – 12:15 pm

Sections 861-863: Sourcing Income & Expenses (Con't)

1:00 – 2:15 pm

Christine Jones | International Tax Senior Manager, Ernst & Young LLP

Anna Voortman | International Tax Services, Ernst & Young LLP



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Virtual U.S. International Tax Course - Simulive Edition (2022)

Time (ET)

Wednesday, January 25

11:00 am - 12:15 pm

Foreign Tax Credit

1:00 - 2:15 pm

Young Choi | Associate, Tax, Baker McKenzie LLP

Samuel Pollack | Partner, Global Tax Practice, Baker McKenzie LLP

Julia Skubis Weber | Partner, Global Tax Practice, Baker McKenzie LLP

Thursday, January 26

11:00 am - 12:30 pm

Foreign Tax Credit (Con't)

Young Choi | Associate, Tax, Baker McKenzie LLP

Samuel Pollack | Partner, Global Tax Practice, Baker McKenzie LLP

Julia Skubis Weber | Partner, Global Tax Practice, Baker McKenzie LLP

1:00 - 2:15 pm

Sections 367 and 7874: International Reorganizations & Inversions

Michael Cardella | Counsel, Tax, Skadden, Arps, Slate, Meagher & Flom LLP

Jeff Romero | Associate, Tax, Skadden, Arps, Slate, Meagher & Flom LLP

Wednesday, February 1

11:00 am - 12:15 pm

Inbound Issues: U.S. Taxation of Nonresident Companies

1:00 - 2:15 pm

Michael Bruno | Partner, McDermott Will & Emery LLP

Steve Hadjilogiou | Partner, McDermott Will & Emery LLP



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Virtual U.S. International Tax Course - Simulive Edition (2022)

Time (ET)

Thursday, February 2

11:00 am - 12:15 pm

Foreign Currency Issues, including Section 987

1:00 - 2:15 pm

Tim Kerr | Partner, National Tax, Ernst & Young LLP

Bob Leonard | Senior Manager, Ernst & Young LLP

Wednesday, February 8

11:00 am - 12:15 pm

FATCA, Withholding Tax and Other Reporting Requirements for Foreign Investments

1:00 - 2:15 pm

Laurie Hatten-Boyd | Principal, Information Reporting & Withholding Tax, KPMG LLP

Kelli Wooten | Tax Principal, Information Reporting and Withholding Tax Services, KPMG LLP

Thursday, February 9

11:00 am - 12:15 pm

Earnings & Profits

1:00 - 2:15 pm

Michael Medley | Partner, Tax, Deloitte Tax LLP

Paul Wagoner | Deloitte Tax LLP

Wednesday, February 15

11:00 am - 12:30 pm

Subpart F and GILTI

Adam Halpern | Partner & Chair, Tax, Fenwick & West LLP

William Skinner | Partner, Tax, Fenwick & West LLP



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Virtual U.S. International Tax Course - Simulive Edition (2022)

Time (ET)

Thursday, February 16

11:00 am - 12:15 pm

Subpart F and GILTI (Con't)

1:00 - 2:15 pm

Adam Halpern | Partner & Chair, Tax, Fenwick & West LLP

William Skinner | Partner, Tax, Fenwick & West LLP

Thursday, February 23

11:00 am - 12:15 pm

Section 482, BEPS, and Foreign Tax Regimes

1:00 - 2:15 pm

J. Brian Davis | Partner, International Tax, BakerHostetler

Nicholas Mowbray | Counsel, BakerHostetler

Friday, February 24

11:00 am - 1:00 pm

Documentation and Information Reporting from Foreign Affiliates (Including Forms 5471 and 5472)

Kristina Reynolds | Managing Director, Alvarez & Marsal Taxand LLC

Brendan Sinnott | Senior Director, Alvarez & Marsal Taxand LLC

Wednesday, March 1

11:00 am - 12:15 pm

Bringing It All Together: Structuring of Foreign Transactions & Operations to Minimize the Corporate Tax Burden

1:00 - 2:15 pm

Jason Gritton | Senior Manager, Deloitte Tax LLP

Michael Thompson | Partner, Audit & Assurance, Deloitte Tax LLP



Connect. Engage. Impact.

Virtual U.S. International Tax Course - Simulive Edition (2022)

Time (ET)

Thursday, March 2

11:00 am - 12:30 pm

Bringing It All Together: Structuring of Foreign Transactions & Operations to Minimize the Corporate Tax Burden (Con't)

Jason Gritton | Senior Manager, Deloitte Tax LLP

Michael Thompson | Partner, Audit & Assurance, Deloitte Tax LLP



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GENERAL INFORMATION

Registration Fees

Simulive attendees may register for all 12 **Simulive** sessions (**Full Session Bundle**), or they may select individual sessions for purchase. Individual sessions are not eligible for discount.

	TEI Member	Non-Member
Full Session Bundle	\$1,195	\$1,395
Individual Sessions	\$195	\$295

Registrations

The U.S. International Tax Course - Simulive Edition (2022) is open to members of TEI and other in-house tax professionals, as well as individuals working for TEI sponsoring firms. Governmental employees are ineligible to attend.

Format

These **Simulive** sessions were recorded at the U.S. International Tax Course (2022) and will be re-aired with live subject matter experts to answer questions from registrants. There will be attendance popups throughout the sessions to ensure active participation.



By web:

<https://www.tei.org/events-education/events/2023-us-international-tax-course-simulive-edition>
You must log in before registering.



By mail:

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



By fax:

202.638.5607. Credit card registrations only.



By email:

Scan and send completed registration form with credit card information to meetings@tei.org.

Cancellation and Substitution Policy

All cancellations must be received in writing by January 6, 2023 at meetings@tei.org. Cancellations will be subject to a \$50 cancellation fee. There are no partial refunds if you can only attend some of the sessions. Substitutions may be made prior to the start of the series; however, there are no partial registrations or sharing of registration for CPE purposes. Substitutions requests should be emailed to meetings@tei.org and are subject to a \$25 fee.

TEI's liability is limited to the return of the registration fee.
TEI's Federal Taxpayer ID Number is 52-0239291.

If you have any questions or concerns leading up to the sessions, please contact meetings@tei.org.



Virtual U.S. International Tax Course - Simulive Edition (2022)

GENERAL INFORMATION - CONTINUED

Financial Aid for Illinois Licensed Attorneys

Scholarships to defray tuition expense for this program are available for in-house tax professionals (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. To request information on whether you might qualify, please contact us at meetings@tei.org.

Questions?

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

CPE Credit Information

Tax Executives Institute Education Foundation is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of "Internet live" continuing professional education on the National Registry of CPE Sponsors.

Date

January 11, 2023 – March 2, 2023

Delivery Method

Internet Live

Program Level

Overview

Field of Study

Taxes

Prerequisite

None

Advanced Preparation

No advanced preparation required.

CPE Credit

Approximately 36.0 credits based on a 50-minute hour.

Disclaimers

State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. To submit a complaint about a specific program, speaker or content, please email meetings@tei.org. Complaints regarding sponsors may be addressed to National Registry of CPE Sponsors, 150 Fourth Avenue North, Ste. 700, Nashville, TN 37219-2417. Website: www.nasbaregistry.org





ELIGIBILITY

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REGISTRATION FEES (in U.S. \$)

FULL COURSE (ALL SESSIONS)

\$1,195 Member

\$1,395 Non-Member

INDIVIDUAL SESSIONS (NOT ADDITIVE FOR A DISCOUNT)

\$195 Member

\$295 Non-Member

Development of International
Tax Law & Policy

Sections 861-863: Sourcing
Income & Expenses

Foreign Tax Credit

Sections 367 and 7874: International
Reorganizations & Inversions

Inbound Issues: U.S. Taxation of
Nonresident Companies

Foreign Currency Issues, including
Section 987

FATCA, Withholding Tax and Other Reporting
Requirements for Foreign Investments

Earnings & Profits

Subpart F and GILTI

Section 482, BEPS, and Foreign
Tax Regimes

Documentation and Information Reporting
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5471 and 5472)

Bringing It All Together: Structuring of
Foreign Transactions & Operations to
Minimize the Corporate Tax Burden

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REGISTRATION FORM

The registration fee covers course materials and other items specified in the seminar announcement. Applications will be accepted on a first-come, first-served basis. Registrants are encouraged to register via www.tei.org. Credit card registrations may be 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 registrations to TEI's street address. Questions? Call 202.638.5601 or email: meetings@tei.org.

Name

Company

Mailing Address

City

State/Province Zip/Zone

Telephone/Fax

Email

Charge to: VISA MasterCard American Express Discover Diners Club

Card Number

Exp. Date CVV

Cardholder Name (print)

Signature

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