



20th Annual International Tax Symposium
Dallas-November 2, 2017 • Houston-November 3, 2017
CLE Hours 7.50 • Course Number 928011139
CPE Hours 9.0 • Sponsor ID #135

<p>8:00 Registration/Breakfast</p>	<p>1:00 Post-Lunch Break</p>
<p>8:30 Panel – Offshore Voluntary Disclosure Program/Streamlined Compliance Update [.75 CLE/1.0 CPE] <i>Daniel Price, Austin Internal Revenue Service, Austin, Texas</i> <i>Austin Carlson, Gray Reed & McGraw, Houston, Texas</i></p> <p>This panel discussion will provide an overview and update of offshore compliance options offered by the Internal Revenue Service to the U.S. taxpayers.</p>	<p>1:15-2:00 PFICs- Uh-Oh and Oh Yes! [.75 CLE/1.0 CPE] <i>Mary Beth Lougen, American Expat Taxes Virginia Beach, Virginia</i></p> <p>The presentation will provide a discussion on some unintended PFIC consequences and some even more unintended ways to make PFICs work for your clients.</p>
<p>9:15-10:15 U.S. Permanent Establishment & Taxable Presence Issues [1.0 CLE/1.0 CPE] <i>Bret Wells, The University of Houston Law Center, Houston, Texas</i></p> <p>This presentation will address business presence and permanent establishment type issues for inbound companies working in the U.S. outer shelf.</p>	<p>2:00-2:45 Panel – International Pension Issues [.75 CLE/1.0 CPE] <i>Mishkin Santa, The Wolf Group, Washington, D.C.</i> <i>Rosy Lor, Internal Revenue Service, Washington, D.C.</i></p> <p>This panel discussion will cover issues that arise when a pension in one country is paid to a beneficiary in another country.</p>
<p>10:15-10:30 Break</p>	<p>2:45-3:30 Panel – International Criminal Tax [.75 CLE/1.0 CPE] <i>Mark Daly, Department of Justice, Washington, D.C.</i> <i>Jason Freeman, Freeman Law, Frisco, Texas</i></p> <p>This panel discussion will cover recent developments in international criminal tax matters.</p>
<p>10:30-11:15 U.S. Territory (U.S. Virgin Islands & Puerto Rico) Tax [.75 CLE/1.0 CPE] <i>Jorie Roberts, Marjorie Rawls Roberts, PC St. Thomas, Virgin Islands</i></p> <p>This presentation will provide an overview of the tax incentive programs in the U.S. Virgin Islands and Puerto Rico. The presentation will also provide an overview of income sourcing and bona fide residency requirements applicable to the U.S. Virgin Islands and Puerto Rico.</p>	<p>3:30-3:45 Break</p>
<p>11:15-12:00 Corporate International Tax Law Update [.75 CLE/1.0 CPE] <i>William Skinner, Fenwick & West, Mountain View, California</i></p> <p>This session will focus on issues of recent importance in the U.S. federal international tax arena, including review and analysis of legislative, administrative, and judicial developments.</p>	<p>3:45-4:30 Expatriation [.75 CLE/.75 CPE] <i>Philip Hodgen, Hodgen Law, Pasadena, California</i></p> <p>This session will cover tax issues related to expatriation.</p>
<p>12:00 Lunch Break</p>	<p>4:30-5:00 Trust and Estate Distributions to Foreign Beneficiaries [.75 CLE/.75 CPE] <i>John Strohmeyer, Crady Jewett McCulley, Houston, Texas</i></p> <p>This presentation will cover the intersection of international tax and fiduciary tax under Subchapter J.</p>
<p>12:15-1:00 Washington Update [.75 CLE/1.0 CPE] <i>Fred F. Murray, The University of Florida, Gainesville, Florida</i></p> <p>This presentation will focus on recent and coming tax developments coming out of Washington, D.C.</p>	<p>5:00 Reception</p>
