

Agenda

Day 1	Intermediate in Zilker 4	Advanced in Zilker 3	CFO Track in Zilker 1-2
08:00 - 08:15	Introductions		
08:20 - 10:00	Recent Developments US, Puerto Rico, Canada and Mexico		
10:00 - 10:15	Break in Zilker North Lobby		
10:15 - 11:05	Indirect Tax Basics in Canada and the EU		
11:15 - 12:05	Interest Stripping – Section 163(j) Basics	Taxation of the Cloud – Income Characterization and Sourcing Issues	International Expansion - Jurisdictional Considerations and Acquisition Planning
12:15 - 13:15	Lunch: IRS Speaker – OVDP and other IRS Updates in Zilker 1-2		
13:15 - 14:05	Foreign Tax Credits - Sourcing of Income (Basic)	State Treatment of Subpart F and Other Foreign Source Income	International Due Diligence – Maximizing Value
14:15 - 15:05	Foreign Tax Credits - Expense Apportionment	Transfer Pricing – Intermediate	Roundtable – United Kingdom and Germany
15:15 - 15:30	Break in Zilker North Lobby		
15:30 - 16:20	Tax Compliance for International Activities	CFC basics	Roundtable – Australia, New Zealand, China and Hong Kong
16:30 - 17:20	PFICs – Reporting Regimes and Filing Requirements	Deferral Planning – Contract Manufacturing, Holding Companies, Check the Box Rules	Roundtable – Mexico and Canada
17:20	Cocktail Reception for all Attendees at Foothills II, 17th Floor		

Day 2	Intermediate in Zilker 4	Advanced in Zilker 3	CFO Track in Zilker 1-2
08:00 - 09:10	SALT View of Tax Treaties, Conflicts with PE Rules and Taxation of Nonresidents		
09:10 - 10:00	Plenary – Brazil		
10:00 - 10:15	Break in Zilker North Lobby		
10:15 - 11:05	Transfer Pricing – General Concepts and Documentation	European Holding Companies: Ireland, Netherlands, Luxembourg	Financing Foreign Entities
11:15 - 12:05	Foreign Earned Income Exclusion	Accounting for Income Tax - International Issues	
12:15 - 13:15	Lunch in Zilker 1-2		
13:15 - 14:05	Chapter 3 and 4 Withholding Primer	Traps for the Unwary – Section 956, 267, Inversions and Other Problem Areas	Effective Tax Rate Strategies
14:15 - 15:05	Completing Forms 1042 and 1042-S	IP Migrations – Basics	Sales and Use Tax – General Overview for U.S. Inbound Investment

Registration

To register, please visit www.praxity-conferences.com.

Sign up for this exclusive conference as soon as possible on or before October 9th and take advantage of the Early Bird Price: \$1,295 (\$1,395 thereafter).

Includes breakfast, lunch, refreshment breaks, and conference materials on both days. The conference takes place at Hyatt Regency Austin.

Please note: you are required to book your own accommodation. Once you have registered for the conference, you will receive an email within 24 hours to confirm registration.

