

VIRTUAL WEBCASTS

+

90-DAY ACCESS

6TH ANNUAL

# INTERNATIONAL TAX BOOT CAMP

JANUARY 13, 2021

39TH ANNUAL

# INTERNATIONAL TAX CONFERENCE

JANUARY 14-15, 2021



**TAX SECTION**  
of The Florida Bar

**FICPA**

Florida Institute of Certified Public Accountants

# 6TH ANNUAL INTERNATIONAL TAX BOOT CAMP

JANUARY 13, 2021  
COURSE 4321



*The 6th Annual International Tax Boot Camp is an introductory level program designed to prepare you with a foundational understanding of international tax. The Boot Camp will cover the basic topics of international inbound and outbound taxation as well as international tax forms. Attend this program to be prepared for the substantive content covered during the 2-day International Tax Conference. This year, the Boot Camp will be offered completely virtually. **Enjoy 90-Day OnDemand access to the program with your registration!***

## THE LINEUP

9:00 AM - 9:05 AM	<b>Introduction &amp; Opening Remarks</b> Lawrence Chastang, FICPA Program Co-Chair Steven Hadjilogiou, Tax Section Program Co-Chair
9:05 AM - 10:45 AM	<b>International Inbound Taxation</b> Arianne Plasencia, McDermott Will & Emery, Miami Logan Gans, Shutts & Bowen LLP, Miami
10:45 AM - 11:05 AM	<b>Morning Break</b>
11:05 AM - 12:45 PM	<b>International Inbound Taxation, continued</b> Arianne Plasencia, McDermott Will & Emery, Miami Logan Gans, Shutts & Bowen LLP, Miami
12:45 PM - 1:30 PM	<b>Lunch Break</b>
1:30 PM - 3:50 PM	<b>International Outbound Taxation</b> William B. Sherman, Holland & Knight LLP, Fort Lauderdale Arthur Dichter, Berkowitz Pollack Brant, Miami
3:50 PM - 4:10 PM	<b>Afternoon Break</b>
4:10 PM - 5:10 PM	<b>International Tax Form 5471</b> Jeffrey Blinn, Principal, MBAF, Miami Lisandra Silva, MBAF, Miami

# 39TH ANNUAL INTERNATIONAL TAX CONFERENCE

JANUARY 14 - 15, 2021  
COURSE 4130



*The International Tax Conference is a 2-day program that provides substantive content for certified public accountants and licensed attorneys with a specialization in tax. With changes and developments happening in international finance every day, there's only one conference in Florida that you can trust to provide the knowledge needed for your multinational organization or clients. This year, the ITC will be offered completely virtually. **Enjoy 90-Day OnDemand access to the program with your registration!***

## THE LINEUP | DAY 1

**8:55 AM - 9:00 AM**

### **Introduction & Opening Remarks**

Lawrence Chastang, FICPA Program Co-Chair  
Steven Hadjilogiou, Tax Section Program Co-Chair

**9:00 AM - 9:50 AM**

### **Current Developments in International Taxation: Outbound Update**

Larry Kemm, Esq. Partner, Holland & Knight LLP

*This session will review significant statutory, regulatory, administrative, and judicial developments in U.S. outbound international taxation that occurred during 2020.*

**9:40 AM - 10:40 AM**

### **Planning for Foreign Investment in Distressed Debt**

Seth J. Entin, Esq. Partner, Holland & Knight LLP

*One of the consequences of the unfortunate COVID-19 pandemic is increased interest by foreign persons in acquiring distressed debt of U.S. borrowers. This presentation will discuss the various tax rules that are applicable as well as planning opportunities to consider and pitfalls to avoid.*

**10:40 AM - 11:00 AM**

### **Morning Break**

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**THE LINEUP | DAY 1**

**11:00 AM - 11:50 AM**

**Loss Planning in a Pandemic:  
Making the Most of Tough Year**

Robert H Moore, Partner, Baker McKenzie, LLP, Miami  
Michael D. Melrose, Partner, Baker McKenzie, LLP, Miami

*This presentation will explore loss planning transactions in a post-TCJA and pandemic environment. Particular focus will be on NOL utilization, planning for CFCs with losses, and impact of GILTI.*

**11:50 AM - 12:30 PM**

**Lunch Break**

**12:30 PM - 1:20 PM**

**International Initiatives for 2021 and Beyond:  
What to Expect from the IRS**

Charles Rettig, Esq., Commissioner Internal Revenue Service

**1:20 PM - 2:10 PM**

**So Your Guy Didn't Win the Election: Time to Expatriate?**

Hal Webb, Esq. Partner, Bilzin Sumberg  
Jen Wioncek, Esq. Partner, Bilzin Sumberg

*This presentation will review the U.S. "exit tax" rules under Code Sections 877A and 2801, and discuss situations often faced by practitioners with clients wanting to expatriate, including related planning considerations.*

**2:10 PM - 2:30 PM**

**Afternoon Break**

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**THE LINEUP | DAY 1**

**2:30 PM - 3:20 PM**

**FDII for All: Practical Strategies for U.S. and non-U.S. Businesses for a Reduced Tax Rate under the FDII Regime**

Steven Hadjilogiou, Partner, McDermott Will & Emery

*A discussion of creative planning strategies to take advantage of the reduced tax rates available under the so-called FDII regime. The presentation will discuss how FDII can be used to the advantage of non-US and US businesses that export goods and services, especially into Latin America, Europe and Asia. When applicable FDII can reduce federal tax rates on income to 13.125%.*

**3:20 PM - 4:10 PM**

**State and Local Tax Issues:  
The State Tax on Foreign Income**

Alysse McLoughlin, Partner, McDermott Will & Emery

Katie Quinn, Partner, McDermott Will & Emery

*We will discuss recent attempts by states to tax foreign income, including global intangible low-taxed income.*

**4:10 PM - 5:00 PM**

**Practical Cross Border Estate Planning Considerations for the High Net Worth Global Family**

Leslie A. Share, Esq., Shareholder, Packman, Neuwahl & Rosenberg, P.A., Miami & Boca Raton

Shawn Wolf Esq., Shareholder, Packman, Neuwahl & Rosenberg, P.A.

*Our presentation will review various U.S. tax and planning issues that U.S. practitioners regularly encounter with regard to asset and business holding structures for wealthy multinational families which include current or prospective U.S. persons. It will also analyze how certain popular offshore planning techniques (for example, usufructs, private foundations, and "shortcut title planning") can cause difficulties for U.S. attorneys and tax preparers along with providing suggested potential solutions and reporting positions.*

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**THE LINEUP | DAY 2**

**8:25 AM - 8:30 AM**

**Introduction & Opening Remarks**

Lawrence Chastang, FICPA Program Co-Chair  
Steven Hadjiligiou, Tax Section Program Co-Chair

**8:30 AM - 9:20 PM**

**Current Developments in International Taxation:  
Inbound and Controversy Update**

William M. Sharp Sr, Esq., Partner,  
Holland & Knight LLP, Atlanta, San Francisco and Tampa

*The presentation will highlight and provide practitioner comments related to two general areas: first "inbound" U.S. statutory, regulatory, administrative and judicial developments; and second, a review of the past year's most important U.S. Tax Court & Federal Court decisions addressing inbound, controversy and compliance issues, including a review of recent IRS/DOJ initiatives and recent FBAR litigation outcomes as well as pending cases.*

**9:20 AM - 10:10 AM**

**Latest Pitfalls and Planning Considerations for  
GILTI and CFC Classification**

Michael Bruno Esq. McDermott, Will & Emory LLP

*This session will cover (i) relevant aspects of 2020 final regulations released on section 951A and the section 250 deduction, (ii) tested loss considerations; (iii) proposed and final regulations relating to the repeal of section 958(b)(4); and (iv) some of the latest planning strategies and pitfalls for closely held CFCs that produce GILTI.*

**10:10 AM - 10:30 AM**

**Morning Break**



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**THE LINEUP | DAY 2**

**10:30 AM - 11:20 AM**

**What Every US Tax Advisor Must Know When Representing Clients with Operations in Europe: Impact of Mandatory Reporting Regime under DAC 6**

Alan Granwell, Of Counsel, Holland & Knight  
Emma White Esq., Partner, Forsters, London UK  
Monique van Herksen, LLM, Partner, Simmons + Simmons, Amsterdam, The Netherlands

*The presentation will review the background and application of the EU DAC6 Mandatory Disclosure Regime and how US taxpayers (with European Union connections) and advisors should navigate this regime.*

**11:20 AM - 12:10 PM**

**Holding Taxpayers (and their Advisors) Accountable: An Update from IRS on International Enforcement Efforts**

Jeffrey A. Neiman, Esq., Partner, Marcus, Neiman, Rashbaum & Pineiro LLP  
Vincent A. Citro, Esq., Partner, Horwitz & Citro, PA  
Carolyn Schenck, National Fraud Counsel & Assistant Division Counsel (International) SB/SE  
James C. Lee, Chief, IRS Criminal Investigation

*In one of their first joint presentations since starting their newly announced positions, IRS Criminal Investigation Chief Lee and National Fraud Counsel Schenck will give us an update on their enforcement efforts on both the criminal and civil fronts. In their own words, we will hear about IRS priorities, the impact of unprecedented international information sharing, and how the IRS continues to combat offshore tax evasion.*

**12:10 PM - 12:40 PM**

**Lunch Break**

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**THE LINEUP | DAY 2**

**12:40 PM - 1:20 PM**

**Post 2020 Election Tax Policy Outlook**

Mark A. Prater, Managing Director, Tax Policy Services,  
PricewaterhouseCoopers, Washington, D.C.

*The presentation will cover changes in players and priorities on the federal tax policy landscape in light of the 2020 elections. Consideration of time sensitive legislation, developments in the OECD Pillars I and II project and design issues with respect to the international tax reforms of the Tax Cuts And Jobs Act of 2017.*

**1:20 PM - 2:10 PM**

**U.S. Treaty Policy: Where Are We Today?**

Robert Stack, Esq., Managing Director, International Tax Practice,  
Deloitte Tax LLP, Washington, D.C.  
Harrison Cohen, Esq., Managing Director, International Tax  
Practice, Deloitte Tax LLP, Washington, D.C.

*This presentation will survey the current state of U.S. Treaty policy, including a discussion of recently ratified treaties, pending treaties, and the potential future direction of U.S. treaty policy.*

**2:10 PM - 2:30 PM**

**Afternoon Break**



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**THE LINEUP | DAY 2**

**2:30 PM - 3:20 PM**

**The Use of Hybrid Instruments in Cross-Border Tax Planning**

Jeff Rubinger Esq., Partner, Baker McKenzie, Miami  
Summer Ayers LePree, Partner, Baker McKenzie, Miami

*This panel will focus on recent regulations under Sections 267A, 245A, and 1.881-3 impacting the use of cross-border hybrid instruments in both the inbound and outbound context. The panel also will discuss planning opportunities that remain available under current law, including under relevant U.S. tax treaties.*

**3:20 PM - 4:10 PM**

**Tips to Take Home**

David A. Cumberland, CPA, CGMA, Kerkerling, Barberio & Co., Sarasota  
Laura Plotner, CPA, Partner, Global Services, Chastang & Partners LLP, Tampa

*This presentation will provide practical tips for the international tax practitioner regarding various international tax issues from a compliance perspective. The discussion will include how to avoid making common errors and preparation considerations as well as suggested best practices. The topics will range from applications for ITINs (Form W-7), withholding under FIRPTA (Forms 8288-B, 8288 and 8288-A), nonresident income tax reporting and disclosure forms (Forms 1040NR and 5472), along with U.S. tax resident disclosure forms (Forms 3520, 5471, 8865, FINCEN 114) including discussion of attribution rules for the disclosure forms, and GILTI tax considerations.*

## CLE CREDIT & REGISTRATION INFO



### INTERNATIONAL TAX BOOT CAMP | 4321

#### **CLE Credits**

8.0 General

#### **Certification Credits**

8.0 International Law

8.0 Intl Litigation & Arbitration

8.0 Tax Law

**REGISTER FOR  
BOOT CAMP**

#### **Registration Fee**

*Includes:*

*Printed course book shipped to U.S.  
address AND 90-Day OnDemand  
Access to the program!*

#### **Tax Section/FICPA Member**

**\$320**

#### **Non-Tax Section/FICPA Member**

**\$395**

### INTERNATIONAL TAX CONFERENCE | 4130

#### **CLE Credits**

16.0 General

#### **Certification Credits**

16.0 International Law

16.0 Intl Litigation & Arbitration

16.0 Tax Law

1.0 Wills, Trusts & Estates

**REGISTER FOR  
ITC**

#### **Registration Fee**

*Includes:*

*Digital course book AND 90-Day  
OnDemand Access to the program!*

#### **Tax Section/FICPA Member**

**\$735**

#### **Non-Tax Section/FICPA Member**

**\$810**

Printed course book may be  
purchased separately from FICPA.