

Friday

8.30AM – 10:30AM

Foreign Activities of US Taxpayers

Chair: Nardi Bress, PriceWaterhouseCoopers LLP, Washington, DC

8:30am

Section 367 Authority Issues. The IRS and Department of Treasury are increasingly using section 367 to close down cross border transactions that they find objectionable. In some cases, the real problem appears to be the operation of other tax rules, such as the basis rules of section 362. This panel will explore the recent guidance and discuss the extent to which it is appropriate to use section 367 in this manner. *Speakers:* Marjorie Rollinson, Ernst & Young LLP, Washington, DC; John Merrick, Special Counsel to the Associate Chief Counsel (International), IRS, Washington, DC; Jose Murillo, Attorney-Advisor, Office of International Tax Counsel, Department of Treasury, Washington, DC.

9:30am

Subpart F Developments (Focusing on Contract Manufacturing Regulations). This panel will review the latest subpart F developments, including the contract manufacturing regulations. *Speakers:* Peter Daub, Baker & McKenzie, Washington, DC; Barbara Angus, Angus & Nickerson LLC, Washington, DC; Itai Grinberg, Attorney-Advisor, Office of International Tax Counsel, Department of Treasury, Washington, DC; Mike DiFronzo, Deputy Associate Chief Counsel (International), IRS, Washington, DC.

Friday

10:30AM – 12:00PM

Joint Session of FAUST, FLF, Transfer Pricing and USAFTT

10:30am

Current Developments. This panel will focus on current developments in the international area, including inbound, outbound and transfer pricing. *Speakers:* Peter Blessing, Shearman & Sterling LLP, New York, NY; Michael Mundaca, Deputy Assistant Secretary (International Tax Affairs), Department of Treasury, Washington, DC; Steven Musher, Associate Chief Counsel (International), IRS, Washington, DC; Mark Stone, Holland & Knight, New York, NY; Anne Welsh, KPMG LLP, Seattle, WA.

Friday

12:15PM – 1:15PM

FAUST, FLF, Transfer Pricing and USAFTT Luncheon (*Ticketed Event*)

Friday

7:45PM – 10:00PM

International Committees Dinner * (*Reservations Required*)

***This Program is Appropriate for Young Lawyers**