

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

1:30PM – 2:30PM

Foreign Lawyers Forum

Chair: Chris Warner, NautaDutilh NV, Amsterdam, The Netherlands

1:35pm

Hybrid Entity Provisions and the US - Canada Treaty. Hybrid entity provisions in tax treaties. The US - Canada treaty contains novel hybrid entity provisions. Many questions have arisen regarding the source, intent and operation of these provisions. This panel will explore those questions and describe how practitioners are addressing the uncertainties and difficulties presented through planning and structuring. *Moderator:* David R. Hardy, Osler Hoskin & Harcourt LLP, New York, NY. *Panelists:* Jack Bernstein, Aird & Berlis LLP, Toronto, ON; Marc Darmono, Mc Carthy, Montréal, QB; Michal J. Miller, Roberts & Holland LLP, New York, NY.

2:30pm

Application of Tax Treaties to Collective Investment Vehicles. This panel will examine how treaties apply to Collective Investment Vehicles such as offshore funds and investment partnerships, including whether and how they can claim treaty protection for themselves and/or their owners. The OECD Committee on Fiscal Affairs has established an Informal Consultative Group on the topic, which is scheduled to publish its recommendations in the near future. *Moderator:* Keith Lawson, Investment Company Institute, Washington, DC. *Panelists:* Patricia Brown, Organization for Economic Cooperation and Development, Washington, DC; Chris Gilbert, JP Morgan Chase Bank NA, Bournemouth, UK; Ate Veenstra, Clifford Chance LLP, Amsterdam, The Netherlands.

Friday

7:45PM – 10:00PM

International Committees Dinner * (*Reservations Required*)

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