Get three packed-full days of instruction from leading tax practitioners from law firms, accounting firms, corporations and academia from across the United States

Explore the effects of recent and proposed tax legislation on tax strategies

Attend a newly expanded two-hour session on tax strategies for financially troubled businesses and other loss companies, including a representative from the Department of Treasury

Get two hours of ethics credit:
- New panel: “Oh Man! I Wish I’d Known That: What Transactional Tax Lawyers Need to Know About IRS Audits”
- Exploring the limits of the evolving economic substance and business purpose doctrines and ethical and practice issues raised by recent tax shelter regulations and legislation, by penalty provisions and by Circular 230

Hear policymakers at the IRS and Department of Treasury discuss current developments affecting your corporate tax practice

Participate in a discussion of audience-selected corporate transactions at the Corporate Transactions Breakfast
A LETTER FROM THE PROGRAM CHAIRMAN

Dear Colleague:

I am honored to chair this year’s **Tax Strategies for Corporate Acquisitions, Dispositions, Spin-Offs, Joint Ventures, Financings, Reorganizations & Restructurings**. The program will focus on the entire spectrum of modern major corporate transactions and will update you on the latest regulations and rulings affecting tax practice.

I’d like to take this opportunity to tell you about three aspects of this year’s program that make it well worth your time to attend:

1. You’ll get three packed-full days of instruction from leading tax practitioners from law firms, accounting firms, corporations and academia from across the United States.

2. You’ll also get to hear from policymakers at the IRS and Department of the Treasury at the luncheon programs and on the panels, including an “IRS Speaks” panel chaired by the Deputy Chief Counsel-Technical and featuring the Associate Chief Counsels of Corporate, of Passthroughs and Special Industries, of International and of Financial Institutions and Products.

3. You’ll receive a complimentary CD-ROM version of the newly formatted **Tax Strategies Multi-Volume Course Handbook**, **The Corporate Tax Practice Series: Strategies for Acquisitions, Dispositions, Spin-Offs, Joint Ventures, Financings, Reorganizations & Restructurings**, containing outlines and articles from more than 500 of today’s leading corporate tax practitioners. You’ll also have the opportunity to purchase the over 25,000 page print version of the **Corporate Tax Practice Series** at a discounted price. In response to your requests, you’ll also receive a complimentary Conference Book containing speaker outlines, overheads and PowerPoint slides for use at the program.

I am confident that this year’s **Tax Strategies** program will be the most comprehensive and insightful conference you could possibly attend on corporate tax in 2009. You will receive the very latest information, strategies and practical insights available.

I encourage you to review the program content carefully, read the “10 Compelling Reasons to Attend PLI’s Tax Strategies” and “What Past Attendees Have Said” (on page 5), and then decide if you can afford to miss this unique program.

Very truly yours,

Louis S. Freeman
Program Chairman
Skadden, Arps, Slate, Meagher & Flom LLP
Chicago

P.S. In order to serve you most effectively, PLI has scheduled **Tax Strategies** in 3 locations – New York City, Chicago, and Los Angeles. Select the location and date most convenient for you and call or fax PLI today to ensure that you and your colleagues have reservations.

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**PLI’s Guarantee**

It’s simple. If you’re not completely satisfied with the return on your investment from any PLI program, your money will be refunded in full.

**Reserve your place today, call (800) 260-4PLI.**
This three-day program will focus on the tax issues presented by the entire spectrum of modern major corporate transactions, from relatively simple single-buyer acquisitions of a division or subsidiary to multi-party joint ventures, cross-border mergers, and complex acquisitions of public companies with domestic and foreign operations, including spin-offs and other dispositions of unwanted operations. Evolving techniques for structuring, financing, and refinancing corporate turnovers, restructurings and other activities will be emphasized, with particular attention being paid to consolidated return issues, to the role of new financial products and the effects of the evolving economic substance and business purpose doctrine, and to selected current issues in mergers, acquisitions, and corporate restructurings including the effects of recent legislation on executive compensation and on workouts.

MAJOR TOPICS & SPECIAL FEATURES INCLUDE:

- Selected seller and buyer issues including the tax due diligence process and negotiating and drafting tax provisions in acquisition agreements; financial accounting considerations; and state and local tax issues
- Tax accounting issues in mergers and acquisitions
- Restricted stock, stock options and executive compensation in M&A transactions including the effects of Sections 409A and 457A
- Contingent liabilities in acquisition transactions
- Structuring buyouts/venture capital deals
- Corporate tax strategies and techniques using partnerships and LLCs
- Current issues in tax-free and partially tax-free acquisitive reorganizations
- Current issues in divisive strategies – spin-offs, split-offs and split-ups
- “The IRS Speaks” – A panel chaired by the Deputy Chief Counsel-Technical, and featuring the Associate Chief Counsels of Corporate, of Passthroughs and Special Industries, of International, and of Financial Institutions and Products
- Expanded session on strategies for financially troubled businesses and other loss companies
- Strategies and issues for international acquisitions
- “Cross-border” mergers and other international issues
- Interesting corporate transactions of the past year
- Issues and strategies in corporate financings and refinancings
- Financial products and transactions
- Exploring the limits of the evolving economic substance and business purpose doctrines
- Ethical and practice issues raised by recent tax shelter regulations and legislation and by Circular 230
- New ethics panel: “Oh Man! I Wish I’d Known That: What Transactional Tax Lawyers Need to Know About IRS Audits”
- Treasury luncheon speaker
- Consolidated return planning and strategies under the new regulations
  - Intercompany transactions
  - Investment adjustments
  - Loss disallowance
  - SRLY and consolidated Section 382
  - Making and breaking affiliation
  - Utilizing LLCs in a consolidated return context

For more information on any treatise, including the Table of Contents, log on to www.pli.edu
Government Speakers:

Treasury

Helen H. Morrison
Deputy Benefits Tax Counsel
Department of the Treasury
Washington, D.C.

Jeffrey Van Hove
Deputy Tax Legislative Counsel (Regulatory Affairs)
Department of the Treasury
Washington, D.C.

Donald W. Bakke
Attorney-Advisor (Tax Legislative Counsel)
Department of the Treasury
Washington, D.C. (Los Angeles)

Lee A. Kelley
Deputy Associate Chief Counsel (Corporate)
Internal Revenue Service
Washington, D.C.

Donna Marie Young
Deputy Associate Chief Counsel (Passports & Special Industries)
Internal Revenue Service
Washington, D.C. (Chicago)

Theresa A. Abell
Special Counsel to the Associate Chief Counsel (Corporate)
Internal Revenue Service
Washington, D.C.

Lawrence M. Axelrod
Special Counsel to the Associate Chief Counsel (Corporate)
Internal Revenue Service
Washington, D.C.

Stephen P. Fattman
Special Counsel to the Associate Chief Counsel (International)
Internal Revenue Service
Washington, D.C.

Curtis G. Wilson
Associate Chief Counsel (Passports and Special Industries)
Internal Revenue Service
Washington, D.C. (New York City & Los Angeles)

Michael A. DiFronzo
Deputy Associate Chief Counsel (International)
Internal Revenue Service
Washington, D.C. (Los Angeles)

Suresh T. Advani
Sidley Austin LLP
Chicago (Chicago)

James R. Barry
Mayer Brown LLP
Chicago (Chicago)

Andrew N. Berg
Debevoise & Plimpton LLP
New York City (New York City)

Jerred G. Blanchard, Jr.
Ernst & Young LLP
Houston (Chicago & Los Angeles)

Judy J. Brewster
Skadden, Arps, Slate, Meagher & Flom LLP
Washington, D.C. (Chicago & Los Angeles)

Peter C. Canellos
Wachtell, Lipton, Rosen & Katz
New York City (New York City)

Linda E. Carlisle
White & Case LLP
Washington, D.C.

Glenn R. Carrington
Ernst & Young LLP
Washington, D.C. (New York City)

William G. Cavanaugh
Chadbourn & Parke LLP
New York City (Chicago)

John J. Clair, Jr.
Latham & Watkins LLP
Los Angeles (Los Angeles)

Bryan P. Collins
Deloitte Tax LLP
Washington, D.C. (Chicago)

Marc A. Countryman
Ernst & Young LLP
Washington, D.C. (Chicago)

Jasper L. Cummings, Jr.
Alston & Bird LLP
Raleigh, North Carolina (New York City)

Richard D’Avino
Vice President and Senior Tax Counsel
GE Capital & NBC Universal
General Electric Company
Stamford, Connecticut (New York City)

William S. Dixon
Managing Director, Mergers & Acquisitions
Citigroup Global Markets Inc.
New York City (New York City)

Andrew J. Dubroff
Ernst & Young LLP
Washington, D.C. (New York City)

Danni Sternfeld Dunn
Ernst & Young LLP
San Jose (Chicago & Los Angeles)

Peter L. Faber
McDermott Will & Emery LLP
New York City

Kathleen L. Ferrell
Davis Polk & Wardwell
New York City (New York City)

David L. Forst
Fenwick & West LLP
Mountain View, California (Chicago)

James P. Fuller
Fenwick & West LLP
Mountain View, California (New York City & Los Angeles)

Stuart J. Goldring
Weil, Gotshal & Manges LLP
New York City (Chicago)

Armando Gomez
Skadden, Arps, Slate, Meagher & Flom LLP
Washington, D.C. (New York City)

Stephen L. Gordon
Cravath, Swaine & Moore LLP
New York City (Los Angeles)

Viva Hammer
Crowell & Moring LLP
New York City and Washington, D.C. (Los Angeles)

David P. Hariton
Sullivan & Cromwell LLP
New York City (New York City)

Hal Hicks
Skadden, Arps, Slate, Meagher & Flom LLP
Washington, D.C. (New York City & Chicago)

Thomas A. Humphreys
Morrison & Foerster LLP
New York City (Chicago)

Milton B. Hyman
Irell & Manella LLP
Los Angeles (Los Angeles)

Carl M. Jenks
Jones Day
New York City and Cleveland (New York City)

Bruce E. Kaye
Milbank, Tweed, Hadley & McCloy LLP
New York City (New York City)

Kenneth E. Kempton
Senior Tax Counsel - Director of Tax Examination
GE Corporate Tax
Stamford, Connecticut (Chicago & Los Angeles)

Kevin M. Keyes
Fried, Frank, Harris, Shriver & Jacobson LLP
Washington, D.C. (Los Angeles)

Donald L. Korb
Sullivan & Cromwell LLP
Washington, D.C.

Daniel H. Koffler
Fenwick & West LLP
Mountain View, California (Los Angeles)

Don A. Leatherman
Professor
University of Tennessee College of Law
Knoxville, Tennessee (Los Angeles)

Jack S. Levin
Kirkland & Ellis LLP
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Philip J. Levine
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Washington, D.C. (Los Angeles)

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Jeffrey W. Maddrey
PricewaterhouseCoopers LLP
Washington, D.C. (Los Angeles)

Todd F. Maynes
Kirkland & Ellis LLP
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Jean M. McLoughlin
Davis Polk & Wardwell
Menlo Park (Los Angeles)

William L. McRae
Cleary Gottlieb Steen & Hamilton LLP
New York City (Chicago)

Robert “Buffy” H. Miller
Cooley Godward Kronish LLP
Palo Alto (Los Angeles)

Audrey Nacamuli
Senior Tax Counsel
GE Corporate Tax
Stamford, Connecticut (New York City)

Regina Olshan
Skadden, Arps, Slate, Meagher & Flom LLP
New York City (Chicago)

Pamela F. Olson
Skadden, Arps, Slate, Meagher & Flom LLP
Washington, D.C. (Los Angeles)

Paul W. Oosterhuis
Skadden, Arps, Slate, Meagher & Flom LLP
Washington, D.C. (Los Angeles)

John B. Palmer, III
Foley & Larnder LLP
Chicago (Chicago)

Chairman:
Louis S. Freeman
Skadden, Arps, Slate, Meagher & Flom LLP
Chicago
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Program Attorney: Stacey L. Greenblatt

WHAT PAST ATTENDEES HAVE SAID

“This is the best corporate and transaction tax program available.”
— Kevin Kaiser, KPMG LLP, Eden Prairie, Minnesota

“Simply the best program of its kind.”
— Thomas P. Rohman, McGuire Woods LLP, Richmond, Virginia

“Terrific program for keeping up on the latest developments in tax law and structures.”
Day One: 8:30 a.m. – 6:00 p.m.

Morning Session: 8:30 a.m. – 12:15 p.m.

8:30 | Overview and Strategies in Representing Sellers
Stock sale/asset sale strategies; post-2003 Act structurings; nonliquidation format; deferral techniques; National Star/Unilever; Tele-Communication/Liberty Media; MCA/Matsushita; Times Mirror/Matthew Bender/Reed Elsevier; effects of Section 351(g) and amended Section 351(e); combined sale/redemption; corporate inversion, recapitalization, and other techniques; Seagram/DuPont and its aftermath; Petrie Stores/Toys “R” Us and its aftermath; IMS/Gartner Group; leveraged and sponsored spin-offs; Tribune/ESOP; anatomy of an LBO, special securities, monetization techniques; contingent payments, convertibles, putables, exchangeables; installment treatment; open transaction treatment; effects of recent legislation; IRS Business Plan topics

NYC, CHI & LA: Peter L. Faber, James M. Lynch, Raj Tanden

9:45 | Networking Break

10:00 | Selected Seller and Buyer Issues Including the Tax Due Diligence Process; Negotiating and Drafting Tax Provisions in Acquisition Agreements; Financial Accounting Considerations; and State and Local Tax Issues
Key allocation issues; concerns due to effects of consolidated return regulations on seller; the tax due diligence process; negotiating and drafting provisions in acquisition agreements; financial accounting concerns; reporting requirements; state and local tax considerations; legislative changes and IRS Business Plan topics

NYC: Peter L. Faber, Richard L. Reinhold, Robert Willsens
CHI: Peter L. Faber, James M. Lynch, William G. Cavanagh
LA: Peter L. Faber, James M. Lynch, Raj Tanden

Afternoon Session: 1:45 p.m. – 6:00 p.m.

1:45 | Section 338(h)(10) Strategies
Use of the election under Section 338(h)(10); concerns and traps; opportunities; regulations under Sections 1060 and 338; Section 338(h)(10) and IPOs; the selectivity regulations; bifurcated purchase of part assets and part stock; selectivity through other devices; unresolved allocation issues; treatment of contingent consideration and other special issues; compare proposed Section 336(e) regulations

NYC, CHI & LA: Mark J. Silverman, Karen Gilbreath Sowell, Mark L. Yecies

Day Two: 7:00 a.m. - 6:00 p.m.

Morning Session: 7:00 a.m. – 12:00 p.m.

7:00 | Corporate Transactions Continental Breakfast
Participate in a discussion of audience-selected corporate transactions

NYC, CHI & LA: Mark J. Silverman

8:15 | Current Issues in Tax-Free and Partially Tax-Free Acquisitive Reorganizations
Recent use of tax-free and partially tax-free strategies; observations concerning structuring reorganizations in a world without General Utilities; current issues in the reorganization area and illustrative case studies; multi-step reorganizations and effects of recent revenue rulings; downstream mergers and group inversions; issues involving control and continuity; effects of COBE and COI regulations; reorganizations within a consolidated group; Yoc Heating developments; the “substantially all” requirement; the Bausch & Lomb regulations; triangular reorganization basis regulations; “no net value” regulations; developments in “F” reorganizations; proposed regulations regarding basis recovery and determination; avoidance of reorganization treatment; legislative changes and IRS Business Plan topics

Faculty for the 8:15 panel
NYC: Peter C. Canellis, William S. Dixon, Matthew A. Rosen, William D. Alexander [Associate Chief Counsel (Corporate), Internal Revenue Service]
CHI: Timothy C. Sherck, Lewis R. Steinberg, Bernita L. Thiopen, William D. Alexander [Associate Chief Counsel (Corporate), Internal Revenue Service]
LA: John J. Clair, Jr., Samuel C. Thompson, Jr., Rose L. Williams, William D. Alexander [Associate Chief Counsel (Corporate), Internal Revenue Service]

3:00 | Contingent Consideration and Contingent Liabilities in Acquisition Transactions
Treatment of escrowed and contingent consideration in acquisition transactions; assumption and payment of contingent liabilities in taxable asset acquisitions (Section 1060 and Section 338(h)(10)); stock acquisitions, and tax-free transactions; basis or deduction to buyer; gain (and offsetting deduction) to seller; timing issues; suggested solutions

NYC, CHI & LA: Mark J. Silverman, Karen Gilbreath Sowell, Mark L. Yecies

4:00 | Structuring Buyouts/Venture Capital Deals
Form of LBOs; asset acquisitions, recapitalizations, holding companies; structuring layers of debt and equity; tax issues in financing techniques, including debt/equity; original issue discount; effects of legislative changes; venture capital preferred stock; PK preferred as “plain vanilla”; the effects of amendments to Section 305(c) and Section 305; regulations in representing management; net exercise warrants; issues in a down market

NYC: Deborah L. Pool, Donald E. Rocap
CHI: Jack S. Levin
LA: Stephen L. Gordon, Jodi J. Schwartz

5:00 | Corporate Tax Strategies and Techniques Using Partnerships, LLCs and Other Strategic Alliances
Use of partnerships and other pass-through entities as the joint venture format or the acquiring entity; the rise of partnerships in the public space; mixing board partnerships; leveraged partnerships including the Arc/Arch Coal strategy; treatment of Section 197 intangibles in a partnership context; the “Check-the-Box” regulations; single-member LLCs; issues in a down market

NYC: Stuart L. Rogow, Steven C. Todrys
CHI: Stephen D. Rose, Eric B. Sloan
LA: Stephen D. Rose, William P. Wasserman

6:00 | Adjourn
Day Two (continued)

12:00 “Picnic Lunch” Program: “The IRS Speaks”
NYC: Clarissa C. Potter [Deputy Chief Counsel (Technical)], William D. Alexander [Associate Chief Counsel (Corporate)], Stephen R. Larson [Associate Chief Counsel (Financial Institutions & Products)], John J. Merrick [Special Counsel to the Associate Chief Counsel (Corporate)], Curtis G. Wilson [Associate Chief Counsel (International)], Eric Solomon [Deputy Chief Counsel (Tax Legislative Council)], Jeffrey Van Hove [Deputy Chief Counsel (Regulatory Affairs)], Department of the Treasury]
LA: Clarissa C. Potter [Deputy Chief Counsel (Technical)], William D. Alexander [Associate Chief Counsel (Corporate)], Stephen R. Larson [Associate Chief Counsel (Financial Institutions & Products)], Donna Marie Young [Associate Chief Counsel (Passthroughs & Special Industries)]
CHI: Suresh T. Advani, Linda E. Carlisle, Thomas A. Humphreys [Counsel (Passthroughs & Special Industries)], LA: Linda E. Carlisle, R. David Wheat, Philip B. Wright
NYC: Richard A. D’Avino, Donald L. Korb, Bryan C. Skarlatos, armando Gomez, David p. Hariton, To Be Determined

Morning Session: 7:30 a.m. – 12:30 p.m.

7:30 Continental Breakfast Program:
Interesting Transactions of the Past Year

5:00 Financial Products and Transactions
An overview of innovative tax strategies involving complex derivatives and other financial instruments. Topics may include domestic and cross-border tax issues relating to swaps, credit default swaps, caps, floors, collars, options, structured notes and other “prepaid forwards,” exotic convertible debt securities, “hybrid” securities, and various combinations of the foregoing. The panel will discuss the origins of some of the more prominent products in today’s markets (including both the business and tax rationales underlying the products), as well as any recent initiatives by Congress and the Treasury Department to address the various policy issues that they raise.
NYC: David R. Shapiro, Matthew A. Stevens, Jeffrey Van Hove [Deputy Tax Legislative Counsel (Regulatory Affairs)], Department of the Treasury], Stephen R. Larson [Associate Chief Counsel (Financial Institutions & Products)], internal Revenue Service]
CHI: William L. Mcrae, Steven M. Rosenthal, Jeffrey Van Hove [Deputy Tax Legislative Counsel (Regulatory Affairs)], Department of the Treasury], Stephen R. Larson [Associate Chief Counsel (Financial Institutions & Products)], internal Revenue Service]
LA: Viva Hammert, Jeffrey W. Maddrey, Jeffrey Van Hove [Deputy Tax Legislative Counsel (Regulatory Affairs)], Department of the Treasury], Stephen R. Larson [Associate Chief Counsel (Financial Institutions & Products)], internal Revenue Service]

10:15 Exploring the Limits of the Evolving Economic Substance and Business Purpose Doctrines and Ethical and Practice Issues Raised by Recent Tax Shelter Regulations and Legislation, by Penalty Provisions and by Circular 230
Recent cases and Notices; the IRS litigation position; when to apply which test; application to some tax planning while other tax planning requires neither substance nor business purpose; effects of possible codification; how much substance is enough; effects of factual changes on “ACM-type” and other such transactions; bifurcation of transactions; relative benefits testing; expansion of anti-shelter legislation; the rules for foreign tax planning; changes in the rules for domestic tax planning; recent tax shelter regulations and legislation; penalty legislation and regulations; Circular 230; implications, effects, and ethical and practice issues
NYC: Armando Gomez, David P. Hariton, To Be Determined [Chief Counsel or Designee, Internal Revenue Service]
CHI: Richard M. Lipton, B. John Williams, Jr., To Be Determined [Chief Counsel or Designee, Internal Revenue Service]
LA: Kevin M. Keyes, Pamela F. Olson, To Be Determined [Chief Counsel or Designee, Internal Revenue Service]

11:30 Oh Man! I Wish I’d Known That: What Transactional Tax Lawyers Need to Know About IRS Audits
The rubber meets the road when all the great planning you did gets into audit and your audit colleagues realize that you were so focused on the substantive issues that you missed the procedural and enforcement issues. What did you do that you wouldn’t have done if you’d seen this panel first? Maybe you compromised a privilege, or failed to save important documents, or said something that gives the IRS ammunition. Or maybe you unknowingly committed an ethics violation? An ounce (hour) of prevention is worth a pound of cure.
NYC: Richard A. D’avino, Donald L. Korb, Brian C. Scharlatis, Diana L. Wollman
CHI: Kenneth E. Kempson, Donald L. Korb, Joel V. Williamson, Diana L. Wollman
LA: Kenneth E. Kempson, Donald L. Korb, Diana L. Wollman

Afternoon Session: 2:00 p.m. – 6:00 p.m.

2:00 Tax Strategies for Financially Troubled Businesses and Other Loss Companies
Debt for debt exchanges and debt modification; effect of Cottesmore Savings and final Section 1001 regulations; issues under the Section 382 regulations; bailout legislation and regulations; $382-related Notices; new Section 382(i) and CO/O/D/AHYIO; other downturn issues; guidance on identification of Big’s and BIL’s; effects of options, convertibles, purchase contracts, buy-sell arrangements; strategies for acquirers with losses; strategies for targets with losses; creaping acquisitions of targets coupled with alienability limiting devices; interplay between Section 382 and Section 384; recent strategies in bankruptcies
NYC: Andrew N. Berg, Carl M. Jenks, Eric Solomon, Linda S. Swartz, Jeffrey Van Hove [Deputy Tax Legislative Counsel (Regulatory Affairs)], Department of the Treasury]
CHI: Marc A. Countryman, Stuart J. Goldring, Todd F. Maynes, David H. Schnabel, Jeffrey Van Hove [Deputy Tax Legislative Counsel (Regulatory Affairs)], Department of the Treasury]
LA: Milton B. Hyman, Victor L. Penico, David M. Riemann, Eric Solomon, Donald W. Bakke [Attorney-Advisor (Tax Legislative Counsel)], Department of the Treasury]

4:15 Strategies and Issues for International Acquisitions
Taxable acquisition of U.S.-owned foreign corporations – U.S. seller’s treatment; taxable acquisition of foreign corporations – U.S. purchaser’s treatment; taxable acquisition of U.S. corporations – foreign purchaser’s treatment; interest- stripping; impact of the interest allocation rules; foreign targets with U.S. subsidiaries; Section 338 election and Subpart F income; use of partnerships; use of hybrid entities and hybrid securities in the international context
NYC & LA: James P. Fuller
CHI: David L. Forst

5:00 Cross Border Mergers, Virtual Mergers and Other International Issues
Mergers with U.S. parent companies; mergers with foreign parent companies; dual-holding company and DINC structures; exchangeable share structures; effects of legislative changes and proposals; IRS Business Plan topics; miscellaneous current international issues
NYC: Hal Hicks, Willard B. Taylor, John J. Merrick [Special Counsel to the Deputy Associate Chief Counsel (International), Internal Revenue Service]
CHI: Hal Hicks, Lowell D. Yoder, Steven A. Musher [Associate Chief Counsel (International), Internal Revenue Service]
LA: Paul W. Oosterhuis, Michael A. DiFronzo [Associate Chief Counsel (International), Internal Revenue Service]

6:00 Adjourn

Day Three: 7:30 a.m. – 5:00 p.m.

Morning Session: 7:30 a.m. – 12:30 p.m.

12:30 Treasury “Picnic Lunch” Program:
Treasury Department Keynote Speaker
NYC, CHI & LA: To Be Determined

4:45 Consolidated Return Planning and Strategies (continued)
The final intercompany transaction regulations; consolidated group member stock; the final investment adjustment, earnings and profits and related regulations, the new loss disallowance regime; final regulations on obligations between members; Section 362(e)(2) and §1.1502-80(h); effect of recent court decisions; reverse acquisitions; consolidated Section 382 limitations; SRLY regulations; Section 1504(a)(5) regulations; making and breaking affiliation; planning for acquisitions and dispositions; use of single-member LLCs in a consolidated return context; legislative changes and IRS Business Plan topics
NYC: Andrew J. Dubroff, Audrey Nacamu, Michael L. Schler, Mark A. Schneider, William D. Alexander [Associate Chief Counsel (Corporate), Internal Revenue Service], Theresa A. Abell [Special Counsel to the Associate Chief Counsel (Corporate), Internal Revenue Service], Lawrence M. Axelrod [Special Counsel to the Associate Chief Counsel (Corporate), Internal Revenue Service]
CHI: Jerred G. Blanchard, Jr., Bryan P. Collins, Danni Sternfeld Dunn, Gordon E. Warnke, William D. Alexander [Associate Chief Counsel (Corporate), Internal Revenue Service], Theresa A. Abell [Special Counsel to the Associate Chief Counsel (Corporate), Internal Revenue Service], Lawrence M. Axelrod [Special Counsel to the Associate Chief Counsel (Corporate), Internal Revenue Service]
LA: Jerred G. Blanchard, Jr., Danni Sternfeld Dunn, Gordon E. Warnke, William D. Alexander [Associate Chief Counsel (Corporate), Internal Revenue Service], Theresa A. Abell [Special Counsel to the Associate Chief Counsel (Corporate), Internal Revenue Service], Lawrence M. Axelrod [Special Counsel to the Associate Chief Counsel (Corporate), Internal Revenue Service], Marie C. Milnes-Vasquez [Senior Technical Reviewer, Internal Revenue Service]

3:30 Networking Break

3:45 Consolidated Return Planning and Strategies
NYC: Andrew J. Dubroff, Audrey Nacamu, Michael L. Schler, Mark A. Schneider, William D. Alexander [Associate Chief Counsel (Corporate), Internal Revenue Service], Theresa A. Abell [Special Counsel to the Associate Chief Counsel (Corporate), Internal Revenue Service], Lawrence M. Axelrod [Special Counsel to the Associate Chief Counsel (Corporate), Internal Revenue Service], Marie C. Milnes-Vasquez [Senior Technical Reviewer, Internal Revenue Service]
LA: Jerred G. Blanchard, Jr., Danni Sternfeld Dunn, Gordon E. Warnke, William D. Alexander [Associate Chief Counsel (Corporate), Internal Revenue Service], Theresa A. Abell [Special Counsel to the Associate Chief Counsel (Corporate), Internal Revenue Service], Marie C. Milnes-Vasquez [Senior Technical Reviewer, Internal Revenue Service]

5:00 Adjourn
PLEASE NOTE: Program Attendees may purchase the Multi-Volume Course Handbook at the Special Discounted Price of $795 — a savings of $1,200. A limited supply of Course Handbooks will be available for purchase and must be ordered by December 18, 2009. See Registration/Order Form for details.
Chapter 315: Source of Royalty Income and Place of Use of Intangible Property

Chapter 314: From Storefronts to Servers to Service Providers: Stretching the Permanent Establishment

Chapter 313: Investment in U.S. Real Estate by Sovereign Wealth Funds — Tax Issues

Chapter 312: Cost Sharing Proposed Regulations

Chapter 311: Effective Transfer Pricing as a Planning Tool: A Cost Sharing Case Study

Chapter 310: Negotiating an Advance Pricing Agreement

Chapter 309: The Quest for Marketing Intangibles

Chapter 308: Sharing Intangible Property Within a Multinational Group: Facts Versus Theories

Chapter 307: Assignment of Corporate Opportunities—The Migration of American Intangibles

Chapter 306: Transfer Pricing for Services: The Temporary Regulations

Chapter 305: International Corporate Transaction Planning and Section 482

Chapter 304: Dual Consolidated Losses

Chapter 303: Section 956: Investment in U.S. Property

Chapter 302: IRS Takes Sound Approach to Applying CFC Look-Through Rule

Chapter 301: Comparative Analysis of Three Options Available to a Multinational Corporation for the Development, Ownership, and Use of Intangibles

Chapter 300: Planning Techniques Described in the Treasurer’s Subpart F Study


Chapter 298: Deconstructing Section 905(c): An Examination of the Redetermination Rules After TRA 1997


Chapter 296: Section 901(b) Regulations

Chapter 295: The Bankruptcy Abuse Prevention and Consumer Protection Act of 2005 Summary of Tax Workouts

Chapter 294: The Bankruptcy Abuse Prevention and Consumer Protection Act of 2005 Summary of Tax Workouts

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