

Global Tax and Transfer Pricing Leadership Forum

September 16, 2010 • DLA Piper

EVENT DESCRIPTION:

Senior tax directors from multi national corporations gather for an interactive roundtable breakfast to discuss global tax and transfer pricing strategies.

SPONSORS



ATTENDEES FROM:

Alcoa

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DLA Piper

RSM McGladreym, Inc.

Loyens & Loeff (USA) B.V.

AGENDA:

8:30 AM

Registration, Coffee & Continental Breakfast

8:30—10:30 AM

On August 10, 2010, the Education Jobs and Medicaid Assistance Act of 2010 became a law. It includes several U.S. federal income tax provisions that impacts foreign transactions which are primarily used at limiting the application of foreign tax credits by U.S. taxpayers. Additionally, the law repeals the rules regarding "80/20 companies."

We will address the following topics:

- Covered asset acquisitions
- Items resourced under treaties
- Foreign tax limitations/section 956 inclusions
- Foreign subsidiary redemptions
- Interest expense allocations
- 80/20 rule repeal
- Discussion of the recent Canal Case