

CLER PROGRAM

(Maximum Credit: 17.5 hours)
General: 17.5 hours
Ethics: 2.0 hours

CERTIFICATION PROGRAM

(Maximum Credit: 17.0 hours)

Civil Trial.....	3.0 hours
Criminal Appellate.....	3.0 hours
Criminal Trial.....	3.0 hours
International Law.....	13.5 hours
Real Estate.....	1.0 hour
Tax Law.....	17.5 hours
Wills, Trusts and Estates.....	5.0 hours

Seminar credit may be applied to satisfy both CLER and Board Certification requirements in the amounts specified above, not to exceed the maximum credit. Refer to Chapter 6, Rules Regulating The Florida Bar, for more information about the CLER and Certification Requirements.

Prior to your CLER reporting date (located on the mailing label of your Florida Bar News) you will be sent a Reporting Affidavit or a Notice of Compliance. The Reporting Affidavit must be returned by your CLER reporting date. The Notice of Compliance confirms your completion of the requirement according to Bar records and therefore does not need to be returned. You are encouraged to maintain records of your CLE hours.

REFUND POLICY: Requests for refund or credit toward the purchase of the course book/tapes of this program **must be in writing and postmarked** no later than two business days following the course presentation. Registration fees are non-transferrable, unless transferred to a colleague registering at the same price paid. A \$25 service fee applies to refund requests. Registrants that do not notify The Florida Bar by 5:00 p.m., December 24, 2007, that they will be unable to attend the seminar, will have an additional \$60 retained. Persons attending under the policy of fee waivers will be required to pay \$60.

Thursday Night's
Cocktail Reception
hosted by



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The Florida Bar Continuing Legal Education Committee,
the Tax Section and the Florida Institute of
Certified Public Accountants present the

26th Annual International Tax Conference



January 24-25, 2008

COURSE CLASSIFICATION: INTERMEDIATE TO ADVANCED LEVEL

One Location:
J.W. Marriott Hotel
1109 Brickell Avenue, Miami, Florida 33131
305-671-2690

ADVANCE REGISTRATION REQUIRED

Schedule of Events

Thursday, January 24, 2008

8:00a.m. – 8:45a.m.

Registration & Continental Breakfast

8:45a.m. – 9:00a.m.

Introductions & Opening remarks

9:00a.m. – 9:50a.m.

Current Developments in International Taxation – Around the World in 50 Minutes

David Forst, Fenwick & West, LLP, San Francisco, California

9:50a.m. – 10:40a.m.

The Expanding Universe of Private Equity Funds: Structuring The Acquisition of Foreign Target Companies

Ozzie A. Schindler, Esq and Seth J. Entin, Esq., Greenberg Traurig, Miami, Florida

10:40a.m. – 11:00a.m.

Break

11:00a.m. – 11:50a.m.

U.S. International Tax Planning with Foreign Losses

Jeff Rubinger, Esq., McDermott Will & Emery, LLP, Miami, Florida

11:50a.m. – 12:20p.m.

Lunch (included in registration)

(A quality box lunch within the meeting room will be served in order to save time and allow more educational content to be included in the program).

12:20p.m. – 1:10p.m.

Washington Update

Barry Shott, IRS International, Washington, D.C.

1:10p.m. – 2:00p.m.

Taking your clients to China or India

Tax Planning for U.S.-Controlled Chinese and Indian Business Operations: Organizational, Operational and Transactional Cross-Border Tax Considerations

William Sharp, Sr., Sharp & Associates, P.A., Tampa, Florida

2:00p.m. – 2:50p.m.

U.S. Tax Considerations in Structuring Investments in Foreign Real Estate

Bill Sherman, Holland & Knight, Ft. Lauderdale, Florida

2:50p.m. – 3:10p.m.

Break

3:10p.m. – 4:00p.m.

FIN 48 – Impact on International Tax Practitioners

Bill Spiller, CPA, Grant Thornton, Houston, Texas

Jim Spencer, CPA, Grant Thornton, Miami, Florida

4:00p.m. – 4:50p.m.

Transfer Pricing – What Middle Market Clients Must Have Ready when the IRS Comes Knocking to Avoid the 30 day Scramble...

“Penalty-Proof Your Transfer Pricing Documentation”

Dave Hovey, CPA, Larson Allen, LLP, Tampa, Florida

Carolyn Fanaroff, Greenberg Traurig, Washington, DC

5:00p.m. – 6:30p.m.

Reception

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Friday, January 25, 2008

8:30a.m. – 9:20a.m.

FIRPTA REDUX

Shawn Wolf, Packman, Neuwahl & Rosenberg, Coral Gables, Florida

Jason Warner, Law Office of Jonathan H. (Jason) Warner, P.A.

9:20a.m. – 10:10a.m.

Unwinding of Troubled Offshore Structure - How to Get Out of The Frying Pan without Stepping into the Fire!!

Robert F. Hudson, Jr., Baker & McKenzie, LLP, Miami, Florida

10:10a.m. – 10:30a.m.

Break

10:30a.m. – 11:20a.m.

Current Estate Tax Issues with Selected Treaty Countries and a Comparison of US Tax Results Using the German, Canadian and U.K. Estate Tax Treaties

Renea Glendinning, Kerkering, Barberio & Co. PA, Sarasota, Florida

Tom Roberge, Thomas C. Roberge & Company, St. Petersburg, Florida

11:20a.m. – 12:10p.m.

Miscellaneous Procedural Issues

Panelists:

Robert (“Bob”) E. Panoff, Tax Litigator, Miami

Frank Y. Ng, Commissioner, LMSB, IRS, Washington, DC

Michael E. Yasofsky, Jr. Special Agent in Charge, CI, IRS, South Florida and Puerto Rico,

Plantation

Rodney L. Hare, Territory Manager, SBSE, South Atlantic Area, IRS, Plantation

Paul J. Rolli, Revenue Service Representative, IRS, Plantation

12:10p.m. – 12:40p.m.

Lunch (included in registration)

(A quality box lunch within the meeting room will be served in order to save time and allow more educational content to be included in the program).

12:40p.m. – 1:30p.m.

Continue with Panel Discussion of International Tax Civil and Criminal Procedural Issue

1:30p.m. – 2:30p.m.

Exportation of Profits for Foreign Investors in the US and Domestication of Overseas Profits by US Enterprises

“Repatriation of US Profits and Gains”

Joel J. Karp, Esq., Joel J. Karp, P.A., Miami, Florida

2:30p.m. – 2:40p.m.

Break

2:40p.m. – 3:30p.m.

“Can’t We Be Our Own Trustee?” Foreign Private Trust Companies and Their Use in Estate Planning for Multi-Jurisdictional Families

Steve Cantor, Esq., Cantor & Webb, PA, Miami, Florida

Hal Webb, Esq., Cantor & Webb, PA, Miami, Florida

3:30p.m. – 4:20p.m.

“Mama Said There’d Be Days Like This!” Dealing with the Foreign Non-Grantor Trust Having One or More US Beneficiaries After the Foreign Grantor Dies”

Michael Rosenberg, Packman, Neuwahl & Rosenberg, Coral Gables, Florida

HOTEL RESERVATIONS: A block of rooms has been reserved at the J.W. Marriott Hotel, 1109 Brickell Ave., Miami, at the rate of \$269 single/double occupancy. To make reservations, call the J.W. Marriott direct at (305)671-2690. Reservations must be made by 01/02/2008 to assure the group rate and availability. After that date, the group rate will be granted on a “space available” basis.

Register me for “26th Annual International Tax Conference” (190) J.W. MARRIOTT HOTEL, MIAMI, (1/24-25/08)

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Please check here if you have a disability that may require special attention or services. To ensure availability of appropriate accommodations, attach a general description of your needs. We will contact you for further coordination.

REGISTRATION FEE (check one):

- Member of the Tax Section and the Florida Institute of Certified Public Accountants: \$395
- Non-section member: \$420
- Full-time law college faculty or full-time law student: \$180
- Persons attending under the policy of fee waivers: \$60
Includes Supreme Court, DCA, Circuit and County Judges, General Masters, Judges of Compensation Claims, Administrative Law Judges, and full-time legal aid attorneys if directly related to their client practice. *(We reserve the right to verify employment.)*

METHOD OF PAYMENT (check one):

- Check enclosed made payable to The Florida Bar
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Please include sales tax unless ordering party is tax-exempt or a nonresident of Florida. If this order is to be purchased by a tax-exempt organization, the course book/tapes must be mailed to that organization and not to a person. Include tax-exempt number beside organization’s name on the order form.

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