

U.S. TAX UPDATE

UNIVERSITY OF FLORIDA LEVIN COLLEGE OF LAW, MIAMI

MONDAY, JULY 23

8:00-9:30

REGISTRATION

9:30-10:45

Policy Overview of TCJA: Outbound Perspective

Professor Mindy Herzfeld, UF Levin College of Law

11:00-12:30

Overview of TCJA: Inbound (Domestic) Perspective

Professor Larry Lokken, UF Levin College of Law
Carlos Vaca, PwC National Tax

12:00-12:30

LUNCH

12:30-1:30

Luncheon Speaker

Viva Hammer, Joint Committee on Taxation

2:00-3:30

TCJA Changes You may have missed

Professor Mike Friel, UF Levin College of Law

3:45-5:00

Advising Non-U.S. Clients on the U.S. Tax Law Changes

Professor Jens Schoenfeld,
Flick Gocke Schaumburg, Germany

TUESDAY, JULY 24

9:00-10:15

Inbound Update-163(j)

Matvey Kats, Deloitte NYC

10:30-11:45

BEAT/ Hybrids: TBD

TBD

12:00-12:30

LUNCH

12:30-1:30

Luncheon Speaker: Treasury/IRS

TBD

2:00-3:15

Inbound Structuring Considerations and Section 199A

Jim Barrett, Baker & McKenzie, Miamiaw

3:15-3:45

BREAK

4:00-5:00

Inbound Investment in U.S. Real Estate

Steve Hadjilogiou, Baker & McKenzie, Miami

WEDNESDAY, JULY 25

9:00-10:00

Outbound Update: GILTI

Professor Mindy Herzfeld, UF
Tifphani White-King, Mazars, NY

10:00-11:00

GILTI II

Hans Tanzler, PwC National Office

11:15-12:15

Modeling GILTI

TBD

12:30-1:00

LUNCH

1:00-2:00

Luncheon Speaker: Tax Reform and the Financial Markets

Todd Castagno, Morgan Stanley NYC

2:15-3:30

Export Incentives & FDII:

Helena Klumpp, Ivins, Phillips & Barker, DC
Jon Holbrook, Ivins, Phillips & Barker, DC

3:45-5:00

Advising U.S. Clients on Outbound Structuring

Summer LePree, Bilzin Sumberg
Jeff Rubinger, Bilzin Sumberg

THURSDAY, JULY 26

9:00-10:15

Session A: Fundamentals of U.S. & International Estate Planning

Pedro Corona de la Fuente, Procopio, San Diego

Session B: Accounting for Income Taxes and Tax Reform

Adrienne J. Figur, EY

10:30-12:00

Session A: Cross-border investment & the Section 962 Election

Seth Entin, Greenberg Traurig

Session B: Timing Considerations in GILTI calculations

James Sanderson, KPMG Miami

12:00-12:30

LUNCH

12:30-1:00

Luncheon Speaker

Professor Fred Murray, UF Levin College of Law

2:00-3:15

Session A: Transfer Pricing - Tax Reform Update

Antonio Macia Valdes, DLA Piper, Miami

Session B: Transfer Pricing - Tax Reform Update

Antonio Macia Valdes, DLA Piper, Miami

3:15-3:45

CLOSING REMARKS