

Part IV - Items of General Interest

IRS and The George Washington University Law School To Sponsor Institute on International Tax Issues

Announcement 2006-77

The Internal Revenue Service announces the Nineteenth Annual Institute on Current Issues in International Taxation, jointly sponsored by the Internal Revenue Service and The George Washington University Law School, to be held on December 14 and 15, 2006, at the Grand Hyatt Washington Hotel in Washington, DC. Registration is currently underway for the Institute, which is intended for international tax professionals.

The program will present a unique opportunity for top IRS and Treasury officials and tax experts, and leading private sector specialists, to address breaking issues and present key perspectives on new developments. The first day will feature a discussion by U.S. and foreign tax authorities of current international tax controversies. The first day will also feature sessions on the following:

- Developing Treaty Issues;
- Foreign Tax Credit Guidance for Pass-Through Entities;
- Transfer Pricing Update;
- New Guidance on Foreign Branch Transactions; and
- Case Studies in International Restructurings.

The Honorable Mark W. Everson, Commissioner, Internal Revenue Service, will deliver the luncheon address.

The second day will focus on the following topics:

- Updates on Outbound and Inbound Issues;
- International Tax Challenges: Real Cases, Real Advice;
- Working with the New Subpart F “Look Through” Rule; and
- Emerging Issues in Cross-Border Private Equity Transactions.

Eric Solomon, Acting Deputy Assistant Secretary for Tax Policy at the Treasury Department, will deliver the luncheon address. The second day will also include an “Ask the IRS” panel featuring senior officials from the Service.

Those interested in attending or obtaining more information should contact The George Washington University Law School, at <http://www.law.gwu.edu/ciit>.

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