HIGHLIGHTS: AN OVERVIEW OF CURRENT U.S. TAX TOPICS

Seminar
Calgary, AB
October 28, 2010
Event Sponsor: Hodgson Russ

October 28, 2010
Calgary, AB

The Fairmont Palliser Hotel
133 9th Avenue S.W., Calgary
3-5 p.m.

Staying on top of — and anticipating — developments in U.S. tax law is crucial for businesses and individuals with cross-border interests. Join us for an update on critical and changing U.S. tax topics with a focus on the unique needs of Canadian individuals and businesses.

Who should attend: Lawyers, in-house counsel, accountants, financial planners, investment managers, and anyone interested in U.S. tax matters

<u>Topics:</u>

U.S. Estate Planning Issues

- U.S. Estate Tax Update
- Residence Trusts

IRS Enforcement and Withstanding IRS Scrutiny

- Reporting Requirements and Current Initiatives to Detect Noncompliance
- Voluntary Disclosure: Update on 2009 Program and Ongoing Opportunities

Pending 2011 Changes

- U.S. Tax Rates
- New Tax Legislation

Attorneys

Kevin Gluc

Practices & Industries

Business Tax

Canada-U.S. Cross-Border

Trusts & Estates

HIGHLIGHTS: AN OVERVIEW OF CURRENT U.S. TAX TOPICS

Tax Planning for Business Transactions

- Corporate Inversion Rules
- Financing U.S. Acquisitions and Operations
- Use of Hybrid Entities in Cross-Border Structuring

Updates/Developments in Selected Areas

- New Treaty PE Rules
- Expatriation Rules (Loss of U.S. Citizenship and Long-Term Green Cards)