



16th Annual
**MEXICO
TAX UPDATE**

September 20 & 21, 2012
San Diego, CA.
The Manchester Grand Hyatt

CHAIRPERSONS:

Michael Becka
Ernst & Young LLP
Dallas

Jaime Gonzalez-Bendiksen
Bendiksen, Enriquez, Salazar,
Santoyo & Yanar
Mexico City

Ricardo Rendon
Chevez, Ruiz, Zamarripa y Cia SC
Mexico City

FACULTY:

Gabriel Andrade
KPMG LLP
Monterrey

Steve Axler
Special Counsel to Halliburton
Houston

Armando, Beteta
Ernst & Young LLP
Dallas

Oscar Castaneda
PricewaterhouseCoopers LLP
Monterrey

Alejandro Enriquez-Mariscal
Bendiksen, Enriquez, Salazar,
Santoyo & Yanar, Mexico City

Andres Fuentes
Banamex-Citigroup
Mexico City

Liliana Galindo
KPMG LLP
San Diego

Ricardo Gonzalez-Orta
Deloitte Mexico
Mexico City

Bruce Stelzner
KPMG LLP
San Diego

Additional speakers to
be added

Attend this conference and:

- Discuss Mexico's flat tax: IETU and it's impact on doing business in Mexico
- Understanding the IMMEX decree and its impact to your manufacturing operations
- Learn about the benefits and requirements under the New Empresa Certificada Program ("NEEC")
- Discuss current transfer pricing rules in Mexico
- Learn how to qualify for tax-free mergers and split-ups in streamlining operations in Mexico
- Discuss financing cross-border mergers and acquisitions in Mexico
- Learn about the impact of the FIN 48 disclosure rules for uncertain tax positions on operations in Mexico
- Discuss resolving tax controversies in Mexico and cross-border tax disputes
- Understanding the current rules for maquiladoras in Mexico
- Find out what are the legal and practical tax aspects of structuring royalty payments in Mexico
- Discuss cross-border tax planning for leasing in Mexico
- Find out the latest developments under the Mexico-U.S. Income Tax Treaty

A two-day intermediate level conference with live group instruction on the latest tax and legal strategies for reducing the cost of doing business in Mexico, featuring a discussion of Mexico-U.S. tax planning ideas for 2012

**Up to 16 CPE/CLE
Credits Available**

For more information,
call 914.328.5656,
fax 914.328.5757,
or visit citeusa.org

**Register Early
and Save up to \$300!**

**All paid attendees
will receive the
Bloomberg BNA Portfolio:**

Doing Business in Mexico
#972-4th

*One Portfolio per paid attendee.
Quantities are limited.

Conference Sponsor:



16th Annual

MEXICO TAX UPDATE

September 20 & 21, 2012
San Diego, CA.
The Manchester Grand Hyatt

THURSDAY, SEPTEMBER 20, 2012

8:00 AM **Registration and Continental Breakfast**

8:30 AM **Current Legal and Tax Strategies for Structuring Operations in Mexico**

- Update on recent legislative changes to Mexico's Tax Law and Federal Tax Code
- How Mexican income taxes and levies affect business operations – using an independent or dependent agent to create PE status
- Choosing the proper vehicle for structuring operations in Mexico – use of a holding company or joint venture
- Computing taxable income in Mexico, including employee profit share – how to deal with the flat tax (IETU)
- Dealing with the tax on cash deposits

9:45 AM **Break for Refreshments**

10:00 AM **SOX Corporate Governance Issues Affecting Operations in Mexico**

- What corporate tax practitioners need to know about Sarbanes-Oxley (SOX) – key FIN 48 issues in Mexico
- Common temporary and permanent differences for operations in Mexico – impact of tax audits and litigation on disclosure of uncertain tax positions
- How to achieve auditor independence - non-audit services prohibition
- Resolving conflicts between disclosure and attorney-client privilege
- Main effects of mandatory introduction of IFRs for companies listed in the Mexican stock exchange

11:00 AM **Mexico VAT (Value-added Tax) Update**

- Dealing with value added tax (VAT) issues – understanding how the cash basis and credit system operates in Mexico
- Documentation of eligible credits – procedural aspects
- How to recover VAT credits and refundable amounts
- Understanding the 0% VAT rate for exportations of services

12:00 PM **Luncheon**

Times/topics/speakers subject to change
© 2012 The Bureau of National Affairs, Inc.

For more information, call 914.328.5656,
fax 914.328.5757, or visit citeusa.org

1:15 PM **Mexico M&A Legal and Tax Update**

- Structuring taxable v. tax-free mergers in Mexico – how recent tax law changes affect acquisition and merger activity
- How to achieve de-mergers and spin-offs tax free while preserving tax basis and other attributes
- Stock v. asset acquisitions in Mexico – obtaining a basis step-up in Mexico
- Transfers and amortization of intangibles from the buyer's and seller's perspective – dealing with goodwill issues
- Conducting legal and tax due diligence in reviewing purchase or merger agreements – dealing with escrow accounts

2:30 PM **Break for Refreshments**

2:45 PM **Repatriating Earnings from Mexico**

- Tax issues involving cross-border royalty and technology transfers – U.S.- Mexico income tax treaty planning
- Tax treatment of payments for the use of software in Mexico
- Flat tax impact on royalty payments
- Issues in implementing Cost Contribution Agreements with Mexican subsidiaries
- Use of intercompany services and management fees – advantages and disadvantages of using a conduit entity
- Understanding the domestic legislation of non deduction on pro rata allocations with non residents

4:00 PM **Financing Operations in Mexico**

- Use of debt vs. equity in financing operations – review of the thin capitalization rules in Mexico
- Book and tax differences in accounting for inflation
- Obtaining benefits for interest deductions in Mexico – Flat tax impact on interest payments
- Treatment of exchange gains/losses – impact on income tax and profit sharing basis
- How to use cross-border leasing for transferring equipment to Mexico – dealing with withholding tax issues
- Using both debt and equity financial derivative transactions – Futures, options, hedges and swaps
- Understanding the new REIT and venture capital (CKDs) tax systems in Mexico

5:15 PM **Meeting Adjourns for the Day**

16th Annual

MEXICO TAX UPDATE

September 20 & 21, 2012
San Diego, CA.
The Manchester Grand Hyatt

FRIDAY, SEPTEMBER 21, 2012

7:30 AM Continental Breakfast

8:00 AM Update on Manufacturing Alternatives and IMMEX Tax and Customs Benefits

- Key issues in structuring tax-efficient manufacturing operations in Mexico under the IMMEX Decree – obtaining Certified Importer status and its benefits
- Update on modifications to IMMEX Decree including Article 33 and its impact on tax and customs benefits
- Update on IMMEX transfer pricing guidelines
- Flat tax impact under the Presidential Decree for maquiladora companies
- Benefits and requirements under the New Empresa Certificada Program (“NEEC”)

9:30 AM Break for Refreshments

9:45 AM Key Tax Issues in Sending Individuals to Mexico

- How Mexico taxes activities of non-resident individuals
- When a non-resident working in Mexico on temporary assignment is subject to income or withholding tax
- Stock options compensation-Mexican tax treatment
- Dealing with payroll and other social taxes
- How Mexico taxes income earned by resident alien individuals living in Mexico – avoiding black list and Mexico CFC rules

10:45 AM Dispositions and Reorganizations Involving Subsidiaries in Mexico

- Elections on private shares and rules to achieve exemptions on publicly traded shares – Computing adjusted basis of the stock and paying the tax on net basis
- Strategies for liquidating or disposing of subsidiaries in Mexico
- Taxation of contribution and transfer of appreciated property – migration and deemed liquidation rules
- Advantages and disadvantages of the tax consolidation regime
- Comparison of U.S. and Mexico rules for taxable v. tax-free reorganizations – how to apply for a tax deferral ruling
- Using stock redemptions and capital reductions to restructure operations in Mexico
- Avoiding black list and the Mexico CFC rules on sale or reorganization transactions

12:15 PM Luncheon

1:15 PM U.S. - Mexico Transfer Pricing Issues

- Understanding the transfer pricing and penalty guidelines in Mexico – use of secret comparables
- How to deal with the Mexican reporting requirements for Transfer Pricing Information Returns
- Impact of new US services regs related to Mexico operations
- Increasing audit scrutiny of inter-company transactions – issues in deductibility of cost allocations
- Update on SAT specialized tax transfer pricing audits. Approaching business restructuring regarding commissioners and supply chain
- Filing for a bilateral APA and other Competent Authority proceedings

2:45 PM Break for Refreshments

3:00 PM Resolving Tax Controversies in Mexico

- Understanding the Mexican tax legal system/procedures
- Tax assessments and appeals
- Practical approach to settlements
- Jurisprudence and “Amparo” proceedings
- Recent Mexican court cases and trends on international tax disputes
- Update of IRS tax and customs audit approach regarding US companies doing business in Mexico

4:00 PM Conference Ends

Times/topics/speakers subject to change
© 2012 The Bureau of National Affairs, Inc.

For more information, call 914.328.5656,
fax 914.328.5757, or visit citeusa.org

**Register Early
and Save up to \$300!**

16th Annual
**MEXICO
TAX UPDATE**

Hotel Accommodations:

The Manchester Grand Hyatt

Tel: 888.421.1442

One Market Place, San Diego, CA. 92101

Limited time and number of reduced rate rooms:

\$249.00 per night

Our block of discounted sleeping rooms is limited, so please reserve your sleeping room early! We cannot guarantee rates or availability. Please contact the hotel and mention that you are attending the course listed under CITE. This limited-time discounted rate will be available up to 30 days prior to the meeting, or until the group block is sold-out, whichever comes first. Please note: your sleeping room is not included in the registration fee.

Dress Code:

Business casual attire is requested. Keep in mind meeting room temperatures and personal comfort varies. It is recommended that you bring a sweater or jacket to the sessions as meeting room temperatures are difficult to control

Conference Materials:

Most Bloomberg BNA | CITE program materials are available for purchase to those unable to attend our live conferences. Orders placed for conferences that have not yet taken place will be shipped no earlier than 2-3 weeks after the conference has concluded. Payment must be received in full before material orders can be filled. Please see option on our registration form to order materials.

Conference Fee:

Including continental breakfasts, lunches and refreshment breaks, your investment for attending our *Mexico Tax Update* conference is \$1395. Save up to \$300 by signing up early! This price also includes the conference workbook containing information submitted by speakers – a permanent reference source after the conference has ended.

Payments must be received prior to the conference date. Payments may be made by check, MasterCard, Discover Card, VISA or American Express. Please make all checks payable to Bloomberg BNA | CITE and list the name of the delegate(s) on the face of the check. If payment has not been received prior to the conference date a credit card hold will be required. Financial hardship granted on a per request basis

September 20 & 21, 2012
San Diego, CA.
The Manchester Grand Hyatt

**Samples of Comments From
Our Recent Attendees**

Great Instructors, Excellent discussion topics and presenters"

By attending the conference – I gained the ability to identify issues in the future

Well organized and concise with experienced speakers

The information presented will help me increase compliance for my legal entities

I will not be a Mexican Tax Expert, but now understand enough to ask questions

Speakers were well prepared and very insightful

Thank you for a lively conference!

I learned a lot of new things that are very timely for my work – I'll be back!

Educational Course Credit:

CITE is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor (#103164) of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN, 37219-2417.

Website: www.nasba.org

CITE is an approved sponsor (# 702) of CPE courses for enrolled agents.

For information on our hardship and financial aid policy, please contact us or visit our website citeusa.org.

Substitutions/Cancellations:

Cancellations received more than 72 business hours prior to the meeting will be issued a credit. A \$350 fee will apply to cancellations received within 72 business hours of the event. No credit card or cash refunds will be issued at any time. For more information regarding administrative policies, such as complaints and refunds, please contact us at 914.328.5656, or e-mail info@citeusa.org. Credits will not be issued for "no shows."

Sponsorship Opportunities are Available

For more information contact Bloomberg BNA | CITE at info@citeusa.org or call 914.328.5656



16th Annual
**MEXICO
TAX UPDATE**

September 20 & 21, 2012

San Diego, CA., The Manchester Grand Hyatt

Sample of Companies That Have Attended our Mexico Tax Update Conference Include:

Accuride International
Air Liquide USA
Aguagranjas Dos Lagos
Avnet Inc.
Baker Tilly Virchow Krause
Balken Materials
Bourns, Inc.
Burr, Pilger & Mayer LLP
Buttonwillow Warehouse
Callaway Golf Co.
Cash America International
CDC SA de SV
Clayton & McKervey
Covercraft Industries
Dr. Pepper Snapple
Danisco USA Inc.
Eaton Corporation
Ebm-papst Inc.
Ennis Inc.
Enza Zaden Mexico
Enza Zaden N.A.
First Cash Financial Services
Ford Motor Co.
Glazer's Inc.
Goldcorp.
Goodrich
GSW Manufacturing
Helmerich & Payne
Huhtamaki Americas
Hunter Industries
Innophos
International Flavors
JP Morgan Chase
Kansas City Southern
Kinder Morgan
King Ranch Inc.
Kerry de Mexico
Kerry Ingredients
Key Tronic Corporation
Lyondellbassell
MacLean Fogg Company
Merrick & Company
Metaldyne
NYPRO
Padgett Stratemann & Co.
Paramount Citrus
Penske Trucking
PepsiCo
Plante & Moran LLP
Regal Springs Trading
Reiter Affiliated Companies
Robert Bosch Corporation
Royal Bank of Canada
Sempra Energy
Steris Corporation
Strickler & Prieto
The Hershey Company
The Patron Spirits Company
Thorsteinssons LLP
Toyota
TRT Holdings
Tyco Electronics
Ungerer & Company
Valassis

Why You Should Attend:

Important tax developments in Mexico in 2012 will result in higher taxes for U.S. investors and shareholders in Mexican companies. The Mexico income tax rate will increase in 2012, and the IETU flat (minimum) tax liability is computed by applying the flat tax rate times an enlarged tax base that has been modified by allowing fewer deductions.

Substantial changes in the Maquila legislation may require U.S. companies to re-examine their investment and business strategies in Mexico in the years ahead.

Bloomberg BNA | CITE announces its *16th Annual Mexico Tax Update* course being held September 20 & 21, 2012 in San Diego. This two-day intermediate level conference organized by the Bloomberg BNA | CITE provides an ideal way to get the vital information you need to help your company or client do business in Mexico in the most profitable way.

Bloomberg BNA | CITE has assembled some of the leading experts from both sides of the border to provide you with the in-depth tax knowledge you need to stay current. The networking opportunities and comprehensive written materials alone will provide a major ongoing benefit to attendees.

The conference will address numerous aspects of Mexican taxation as it affects U.S. corporations setting up and doing business in Mexico. More importantly, it will update attendees on the recent Mexico Flat Tax and proposed new legislation.

Diane Pastore
Executive Director
Bloomberg BNA | CITE

Who Should Attend:

This conference is intended for corporate tax directors, managers, controllers and attorneys, as well as practicing CPAs and lawyers with clients doing business in Mexico and other financial executives responsible for business operations in Mexico. No prerequisites/ advanced preparation necessary. This program is transitional and nontransitional which is appropriate for both newly admitted attorneys and experienced attorneys.

**Register Early
and Save up to \$300!**



16th Annual **MEXICO TAX UPDATE**

September 20 & 21, 2012
San Diego, CA.
The Manchester Grand Hyatt

**Bloomberg
BNA**

CITE

P.O. Box 1012
White Plains, NY
10602

MEXICO TAX UPDATE

Five Easy Ways to Register:

- | | | |
|--------------------------------|-------------------------------|--|
| 1. Web:
citeusa.org | 3. Telephone:
914.328.5656 | 5. Mail:
Bloomberg BNA CITE
P.O. Box 1012
White Plains, NY 10602
USA |
| 2. E-Mail:
info@citeusa.org | 4. Facsimile:
914.328.5757 | |

Mexico Tax Update Fee Includes:

Continental breakfasts, lunches, refreshment breaks,
Bloomberg BNA Portfolio, and course materials.

Name

Title

Organization

Address

City State Zip

Telephone Fax

E-mail

Fees:

- \$1095** Early Registration (before June 20)
- \$1295** Registration (before August 20)
- \$1395** Registration (after August 20)

Special Discounts: (Applies to registrations only)

- \$100** Discount for Bloomberg BNA | CITE Members ID# _____

Bloomberg BNA | CITE Membership:

- \$325** Individual **\$625** Corporate (Up to 3 Individuals)

Method of Payment:

All credit cards converted to and billed in U.S. dollars (USD).

- Check enclosed payable to CITE (T.I.N. #14-1716897)
- Credit card payment: MasterCard Visa AmEx Discover

All credit cards will be processed at current U.S. conversion rates

Card No.

V-code Card exp. /Billing Zip

Signature