



BNA Tax & Accounting

CITE (Council for International Tax Education) presents

12th Annual Conference Series on

U.S. Transfer Pricing Planning and Controversies

November 8 & 9, 2010 • Chicago • Chicago Marriott Downtown

A two-day transfer pricing update with live group instruction for intermediate to advanced level tax practitioners responsible for documenting U.S. intercompany charges for cross-border activities

**Save
\$200**
Register Early!

**Updated
for 2010**

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

Here are some of the benefits you can obtain by attending this program:

- Understand how the current economy affects transfer pricing results at your company and how to defend your results with the IRS
- Discover the affect of transfer pricing in preparing financial statements under SEC and IFRS standards and in recognizing FIN 48 liabilities
- Learn the latest strategic selections facing multinationals today in establishing arms-length comparables for sales and service activities
- Find out how your company can enhance shareholder value through migrating intangibles offshore and avoid IRS audit
- Let our experienced faculty analyze for you how the new IRS regulations affect existing and proposed cost-sharing arrangements
- Determine whether your company can utilize a Transfer Pricing Study to reduce or avoid penalties on transfer pricing adjustments
- Learn what the IRS looks for on audit and the latest tools for resolving transfer pricing controversies
- Find out the latest IRS solutions for resolving cross-border transfer pricing disputes, including arbitration and Advanced Pricing Agreements (APAs)
- Featuring a special update on how states apply IRS transfer pricing principles in audits of multistate and multinational companies

Conference Sponsors:



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Transfer Pricing Analytics

Web: www.citeusa.org

Phone: (914)328-5656

Fax: (914)328-5757

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Faculty

Jenny Austin

Baker & McKenzie, Chicago

Stefan Beck

KPMG LLP, Chicago

David Bowen

Grant Thornton LLP, Washington, D.C.

Christopher Desmond

Ceteris, Chicago

Rosanna Gandiaga

PricewaterhouseCoopers LLP, Chicago

Thomas Herr

KPMG LLP, Chicago

Don Jankowski

PricewaterhouseCoopers LLP, Chicago

Eva Parenti

Deloitte Tax LLP, Chicago

Robert Walton

Baker & McKenzie, Chicago

Monday, November 8th

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

8:45 am **Economic Aspects of Transfer Pricing Principles**

- How the IRS economist may challenge crucial assumptions in your company's 2009 and 2010 transfer pricing policies
- Focus on more creative economic analysis in the face of highly publicized decisions and settlements in the United States, Canada, Australia, etc.
- Advantages and limitations on the use of historic survey data – establishing an arm's-length range
- How tight credit conditions affect the selection of profit level indicators and benchmark companies

10:30 am **Break for Refreshments**

10:45 am **Strategic Selection of a Transfer Pricing Method: CPM and Beyond**

- Determining the tested party
- Conducting a strategic functional analysis
- Looking for CUPs in all the right places
- Resale Price and Cost Plus - when they can make the grade
- Using "Other" Methods – guidelines established in GlaxoSmithkline decisions in the United States and Canada

12:15 pm **LUNCHEON**

1:30 pm **How to Maximize your Opportunities with Intangibles and Cost Sharing Agreements**

- Identifying the owner of key manufacturing and marketing intangibles - distinguishing IP from IA
- Implications of licensing, transferring or funding intangibles and establishing an arm's length range
- Selecting comparable uncontrolled transactions and use of the comparable profit margin (CPM) method
- The keys to effective Cost Sharing Agreements – treatment of stock options – valuing buy-in payments after Veritas decision

3:00 pm **Break for Refreshments**

3:15 pm **Reconciling Transfer Pricing and Financial Statements Results**

- What data is comparable for documenting intercompany transactions – determining the Best Method
- Role of transfer pricing in preparing financial statements
- Financial statement considerations - FIN 48 implementation steps
- Interrelationship with Schedules M-3 and UTP

5:00 pm **Meeting Adjourns for the Day**

Sponsorship Opportunities are Available:

For more information contact CITE at info@citeusa.org or (914) 328-5656

Tuesday, November 9th

8:00 am **Continental Breakfast**

9:00 am **Tax Planning for Intercompany Services**

- How will the new regulations impact current intercompany service charges at my company?
- Understand how the new "Benefit" rule requires companies to expand the number of services charged to international affiliates
- Find out what services can be charged at cost
- Focusing on the cost base related to service calculations (including the requirement to include stock based compensation)
- How tax authorities in foreign jurisdictions treat US service charges

10:30 am **Break for Refreshments**

10:45 am **Global Documentation Strategies for Avoiding Transfer Pricing Penalties**

- Satisfying the rules for contemporaneous principal and background documentation using a Transfer Pricing Study
- Preparing a Transfer Pricing Study – verifying or modifying estimated targets for actual results
- How the 20% and 40% penalties are applied to the substantial or gross understatement of tax on an annual basis
- Understanding the exceptions to the Sec. 6662(e) penalty

12:15 pm **LUNCHEON**

1:15 pm **Resolving IRS Transfer Pricing Controversies**

- Things the IRS economist will ask for on audit – who handles the audit – meeting the International Examiner (IE)
- Things to think about before concluding the audit with the IE – litigation strategies - the use of aggregation analysis under Reg. Sec. 1.482-1(f)(2)(i)
- Adjustments required to close the audit with the IRS – filing for relief with the Appeals Office – assessing hazards of litigation
- Understanding the latest strategies for exam-level settlements: fast track mediation, early referral and accelerated issue resolution (AIR) procedures

3:00 pm **Break for Refreshments**

3:15 pm **Administrative Resolution of Cross-Border Pricing Disputes**

- Handling multi-country transfer pricing controversies
- Use of arbitration to settle cross-border transfer pricing disputes in Canada
- How Advance Pricing Agreements (APAs) can be used to assist in resolving IRS audits – negotiating an APA
- When competent authority relief should be used for resolving cross-border pricing controversies

4:45 pm **Meeting Ends**

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Topics and times are subject to change.
Visit our website – www.citeusa.org

Hotel Accommodations: CITE's block of discounted sleeping rooms is limited - reserve your sleeping room early! We cannot guarantee rates or availability. A limited block of rooms at a reduced rate has been set aside for CITE attendees.

Chicago Marriott Downtown
540 North Michigan Ave
Chicago, IL 60611
Tel: (312) 836-0100
Limited time reduced room rate:
\$209.00 per night

Please contact the hotel and mention that you are attending the course listed under CITE. The CITE rate will be available up to approximately 30 days prior to the meeting or until the group block is sold-out, whichever comes first so make your reservation as soon as possible. Your sleeping room is not included in the registration fee.

Conference Materials: All 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.



Educational Course Credit: CITE is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. If your state society is not a NASBA member, please let us know what state(s) you practice in so we can obtain approval. 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. Web site: www.nasba.org

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

For information on CITE's hardship and financial aid policy, please contact us or visit our website. www.citeusa.org This program with live group instruction is nontransitional which is appropriate for experienced attorneys.

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 1-914-328-5656, or e-mail info@citeusa.org Credits will not be issued for "no shows"

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About Our Sponsors:



Ceteris' Global Group of over 50 leading advisors with "Big 4" and industry expertise spans the Americas, Europe and Asia with North American offices in Atlanta, Calgary, Chicago, Dallas, New York and Toronto. With this extensive network, Ceteris is able to provide transfer pricing documentation, planning and local tax authority capability within jurisdictions around the globe.



Deloitte's Global Transfer Pricing Team Rated #1 by Euromoney, Deloitte's multidisciplinary team of transfer pricing specialists helps clients understand, plan for and deal with the complex and dynamic issues surrounding transfer pricing. Deloitte's comprehensive services and technology include planning to improve tax efficiency and defense posture, resolution of global controversies and strategic documentation. Deloitte also offers for license cutting-edge software



EdgarStat is an online subscription database of company financial information and statistical functions for transfer pricing analysis. EdgarStat provides financial information for listed stock exchange companies in the U.S. including the current and historical income statement, balance sheet, financial ratios, 10-k and 10-Q SEC filings to facilitate comparability analysis. www.edgarstat.com

Why You Should Attend: Global transfer pricing planning continues to be a topic of major concern to U.S. outbound and inbound multinationals in 2010. Under FIN 48 guidelines, corporate global pricing policies must be updated annually to reflect profits between business units for income forecasting and financial statement results. As a result, corporate tax and financial executives must establish effective internal controls and defend their pricing policies before their auditors and the IRS.

Due to the risk of penalties and interest on adjustments, companies increasingly are taking action to educate their tax staff on identifying and documenting intercompany transactions in order to reduce their audit exposure. In addition, corporate tax practitioners are required to familiarize themselves with the latest IRS transfer pricing regulations, involving cost-sharing and intercompany services, and update existing documentation.

In today's tax environment, transfer pricing specialists also must be able to ascertain the foreign tax credit implications of a price change and reconcile their tax and financial statement results. Despite efforts to utilize transfer pricing as a planning tool, IRS tax audits of transfer pricing under Sec. 482 require continual updating of intercompany documentation and transfer pricing studies.

UPDATED and IMPROVED FOR 2010! CITE announces its **12th Annual Conference Series on U.S. Transfer Pricing Planning and Controversies**. Many of our experienced faculty members have received CITE's STAR (Speakers with Top Attendee Ratings) Award and can answer your most technical transfer pricing questions. Topics have been updated to include analysis of the new FIN 48 disclosure rules for transfer pricing controversies.

Who Should Attend: CITE announces an updated intermediate level transfer pricing course for corporate tax executives and tax advisors from law and accounting firms. Attendees are recommended to attend **CITE's Transfer Pricing 101** or an equivalent course as a prerequisite to attending this course.

This two-day course is designed as a technical review session to update tax practitioners on the latest reporting and compliance issues under Sec. 482 and the regulations. If you are responsible for your company's or client's transfer pricing strategies and audits, then you don't want to miss this important technical, planning course!



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CITE is now part of BNA Tax & Accounting, the foremost source of news, analysis, and practice tools for tax attorneys, accountants, and corporate tax professionals. To learn more, visit www.bnatax.com

All paid attendees will receive the BNA portfolio:

"Transfer Pricing: Alternative Practical Strategies" (#890)

*One portfolio per paid attendee. Quantities are limited.

Web: www.citeusa.org

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Contact CITE about Special Discounts for three or more attendees from the same company

Registration Fee: Payment is due on or prior to the meeting

Fee includes: Continental breakfasts; two lunches; refreshment breaks; portfolio and documentation binder.

- \$1195** Early-bird Registration (by October 8th)
- \$1395** Registration (after October 8th)
- \$100** Discount for CITE Members - ID# _____
- \$345** Cannot attend. Please send program materials. Add \$75 for shipments outside the U.S.

1 Year CITE Membership Rates:

- \$325** Individual **\$625** Corporate - up to 3 individuals

Method of Payment: Checks must be made in U.S. dollars on a U.S. bank.

- Check enclosed payable to CITE (T.I.N. 14-1716897)
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P.O. Box 1012
White Plains, NY 10602

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