

## International Tax Inaugural Roundtable Agenda

**THURSDAY, MAY 16, 2019**

**Dutch Treat Dinner at 7:00 pm**  
Gibsons Steakhouse (attached to hotel)

**FRIDAY, MAY 17, 2019**

**Roundtable 8:00 am – 3:00 pm**  
DoubleTree by Hilton Hotel Chicago O'Hare Airport-Rosemont – Othello Room

TIME	SESSION
7:30 am – 8:00 am	BREAKFAST
8:00 am – 8:10 am	<b>WELCOME</b> ( <i>PrimeGlobal</i> )
8:10 am – 8:45 am	<b>INTRODUCTIONS</b> ( <i>All</i> )
8:45 am – 9:00 am	<b>AGENDA REVIEW AND MEETING FORMAT</b> ( <i>Mary Richter</i> )
9:00 am – 10:30 am	<b>TECHNICAL TAX MATTERS</b> <ul style="list-style-type: none"> <li>• <b>General Update:</b> <ul style="list-style-type: none"> <li>○ Foreign Attendees: <ul style="list-style-type: none"> <li>▪ UK Brexit (<i>Alastair McQuater</i>)</li> <li>▪ Germany (<i>Neele Wehmeyer</i>)</li> <li>▪ Mexico (<i>Juan Rivero</i>)</li> <li>▪ Canada (<i>Sheryne Mecklai</i>)</li> </ul> </li> <li>○ Current IRS Audits/Trends</li> <li>○ Other?</li> </ul> </li> <li>• <b>Pensions, Trusts &amp; US Tax Treatment</b> (<i>All</i>) <ul style="list-style-type: none"> <li>○ Foreign Controlled</li> <li>○ Grantor</li> <li>○ Specific Countries</li> </ul> </li> <li>• <b>US Partnership with Foreign Partners-ECI and FDAP and Related Reporting</b> (<i>All</i>)</li> <li>• <b>Compliance</b> (<i>All</i>) <ul style="list-style-type: none"> <li>○ 965 Non-disclosure</li> <li>○ OVDP &amp; Streamlined Compliance</li> </ul> </li> </ul>
10:30 am – 11:00 am	
11:00 am – 11:30 am	
11:30 am – 11:45 am	



11:45 am – 1:00 pm	<b>WORKING LUNCH – TABLE DISCUSSIONS</b>  <b>International Services Capabilities</b> ( <i>Kevin Heyde</i> ) <ul style="list-style-type: none"><li>• Tax Provisions</li><li>• Foreign Direct Investment</li><li>• Due Diligence</li><li>• Transfer Pricing</li><li>• Resources &amp; Staffing</li></ul> <b>Education</b> ( <i>Stephanie Chapman &amp; Elena Mossina</i> ) <ul style="list-style-type: none"><li>• External Sources</li><li>• PrimeGlobal<ul style="list-style-type: none"><li>○ Basic International<ul style="list-style-type: none"><li>▪ Overview</li><li>▪ Common Compliance Matters</li><li>▪ FATCA Withholding</li></ul></li><li>○ Advanced Topics</li></ul></li></ul> <b>PrimeGlobal Regional Cooperation</b> ( <i>Alastair McQuater</i> )
1:00 pm – 1:30 pm	<b>TABLE DISCUSSIONS DEBRIEF</b> ( <i>All</i> )
1:30 pm – 3:00 pm	<b>TECHNICAL TAX MATTERS</b> ( <i>All</i> ) <ul style="list-style-type: none"><li>• <b>Post TCJA Planning</b><ul style="list-style-type: none"><li>○ CTB Structuring</li><li>○ 962 Election</li><li>○ State Application of TCJA International Rules</li></ul></li><li>• <b>GILTI</b><ul style="list-style-type: none"><li>○ Interaction with Subpart F</li></ul></li><li>• <b>FDII</b><ul style="list-style-type: none"><li>○ Eligible Product/Services?</li></ul></li></ul>
3:00 pm	<b>ADJOURN</b>