

U.S. TAX ASPECTS OF INTERNATIONAL SHIPPING

May 4 & 5, 2015 • Washington, DC • Mayer Brown LLP

A two-day intermediate level conference with live group instruction on the current developments affecting tax aspects of the shipping industry

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Attend this conference and:

- Keep on top of the latest Federal and state tax issues relating to income tax treaties, FATCA, transfer pricing, Section 883, source of shipping income, subpart F, tonnage tax, IRS examination issues, outer continental shelf, and legislative and regulatory developments
- Network with industry professionals

All paid attendees will receive the Bloomberg BNA Portfolio:

U.S. Taxation of International Shipping and Air Transport Activities #945

*One Portfolio per paid attendee. Quantities are limited.

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For more information, call 800.372.1033 or visit www.bna.com/shipping_DC/

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MONDAY, MAY 4, 2015

- 8:00 AM **Registration & Continental Breakfast**
- 8:30 AM **Overview of Historical U.S. Tax Treatment of Shipping Income**
- 9:45 AM **Source of Shipping Income**
- 10:30 AM **Break for Refreshments**
- 10:45 AM **Direct U.S. Taxation of Foreign Shipping Companies, 4% Tax on Gross Transportation Income, and Special Effectively Connected Income Rules**
- 11:30 AM **Foreign Account Tax Compliance Act (FATCA) and Shipping Companies**
- 12:15 PM **Luncheon**
- 1:15 PM **Reciprocal Shipping Income Exemption (Section 883) – Scope of Coverage**
- 2:15 PM **Income Tax Treaty Shipping Income Exemptions (including OECD Commentary)**
- 3:15 PM **Break for Refreshments**
- 3:30 PM **Section 883 and Treaties – Stock Ownership and Substantiation Requirements and Treaty Shopping Restrictions**
- 4:30 PM **U.S. Controlled Foreign Corporation Provisions (Subpart F) and Passive Foreign Investment Company (PFIC) Provisions**
- 5:30 PM **Seminar Adjourns for the Day**

Times/topics/speakers subject to change

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TUESDAY, MAY 5, 2015

- 8:30 AM **Continental Breakfast**
- 9:00 AM **Tonnage Tax Applicable to U.S. Flag Shipping Companies**
- 10:15 AM **Break for Refreshments**
- 10:30 AM **Transfer Pricing for Shipping Companies**
- 11:45 AM **Luncheon**
- 12:45 PM **Outer Continental Shelf (OCS) Activities**
- 1:30 PM **State and Local Taxes and Capital Construction Fund**
- 2:30 PM **Shipping Tax and Maritime Legislative and Regulatory Developments**
- 3:30 PM **Questions and Answers Session**
- 4:00 PM **Seminar Adjourns**

WHY YOU SHOULD ATTEND

For 2015, Bloomberg BNA has assembled a faculty, chaired by Kenneth Klein from Mayer Brown LLP, of leading tax specialists in the shipping industry from private and public practice, including a panel of government officials. Join our faculty in discussing recent legislation, tax treaty developments and IRS regulations, rulings and examination procedures relating to the shipping industry.

Topics covered include:

- How the reciprocal exemption under Sec. 883 applies for Federal and state tax purposes
- Source of shipping income
- Understanding the Subpart F foreign base company shipping provisions
- The latest tonnage tax developments and an update on recent IRS procedural and examination issues



For more information, call 800.372.1033 or visit www.bna.com/shipping_DC/



FIVE EASY WAYS TO REGISTER:

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USA

WHO SHOULD ATTEND

This seminar is designed for corporate CFOs, VP-Taxes, tax directors, tax managers, tax supervisors and accountants whose job relates to the shipping industry as well as tax professionals who represent their clients in this field. No prerequisites for this intermediate level conference with live group instruction. This program is transitional and nontransitional which is appropriate for both newly admitted attorneys and experienced attorneys.

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CONFERENCE LOCATION

Mayer Brown LLP – Tel.: 202.263.3000

1999 K St NW, Washington, DC 20006

Hotel accommodations are at your own discretion.

We suggest the following:

Renaissance M Street Hotel - 202-775-0800

1143 New Hampshire Ave. NW, Washington, DC 20037

Embassy Suites Washington, DC - 202-857-3385

1250 22nd Street NW, Washington, DC 20037

St. Gregory Hotel - 202-530-3600

2033 M Street, Washington, DC 20036

FEE INCLUDES

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

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U.S. Tax Aspects of International Shipping TMC247

- \$1195** Early Registration (up to 1 month prior to course)
 \$1395 Registration (within 1 month of course)

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