

## ABA Section of Taxation Virtual 31st Annual Philadelphia Tax Conference

**11.11.2020**

Layla Asali will present, as part of a panel, the "International Tax Update," at the 31st Annual Philadelphia Tax Conference on November 11, 2020. This panel will address the impact of the 2020 Coronavirus Aid, Relief, and Economic Security ("CARES") Act net operating loss rules with key international provisions of the Tax Cuts and Jobs Act of 2017 (TCJA). Panelists will discuss significant regulatory developments over the past year with an emphasis on:

- Section 965 transition tax
- Section 250 foreign derived intangible income (FDII) deduction
- Global intangible low-taxed income (GILTI) calculation
- Section 59(A) base erosion and anti-abuse tax (BEAT) - and allowable foreign tax credits

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