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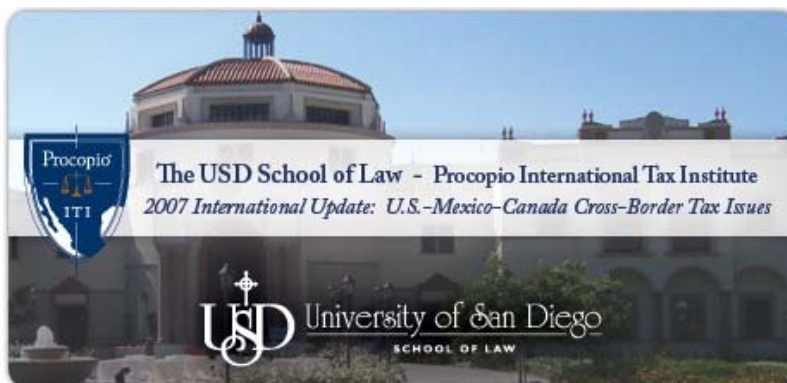
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International Tax Institute



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The USD School of Law - Procopio International Tax Institute

February 15 - 16, 2007

Joan Kroc Institute for Peace and Justice, University of San Diego

Conference Schedule

THURSDAY, FEBRUARY 15, 2007

7:30am Registration and Continental Breakfast

8:45am Introduction and Welcome

*** Language Spoken (with translation available on some courses)**

9:15am-10:30am: Course 1A

MCLE: 1.25 hours

* Spanish/English

Mexico's New Tax Law Reform (2007) - Mexico's New President and Administration; Canadian and U.S. International Tax Developments

[view the presentation »](#)

Moderator

Enrique Hernandez Pulido, Esq.

Procopio, Cory, Hargreaves & Savitch LLP

Speakers

Lic. Julio Cesar Aguilar Matias
*Jefe de la Unidad de Política de Ingresos
Secretaría de la Hacienda y Crédito Publico*

Paul L. Barnicke
PricewaterhouseCoopers LLP

Rocco Femia, Esq.
Miller & Chevalier

10:30 am-10:35 am: Morning Break

10:35am-12:00pm: Course 2A

MCLE: 1.25 hours

* *English*

FIBRAs - Revised Mexican Legislation; Comparison with U.S. and Canadian REIT Rules - Cross Border Real Estate Holdings

[view the presentation »](#)

Moderator

Patrick W. Martin, Esq.
Procopio, Cory, Hargreaves & Savitch LLP

Speakers

Marshall Feiring, Esq.
Sidley Austin LLP

Lic. Luis Gerardo del Valle Tores
Jáuregui, Navarrete y Nader, S.C.

Dr. Alejandro Reynoso del Valle
La Bolsa de Valores Mexicana

10:35am-12:00pm: Course 2B

MCLE: 1.25 hours

*English

International Planning and Recent Reforms of Anti-Deferral Legislation in Mexico, Canada and the U.S.

[view the presentation »](#)

Moderator

John Forry, Esq.
University Professor and Counselor at Law

Speakers

Walter M. Kolligs, Esq.
Ernst & Young LLP - San Francisco

Lic. Mauricio Bravo Fortoul
Turanzas, Bravo & Ambrosi, S.C.

Jas Hayre
Ernst & Young, LLP – Vancouver

12:15pm-1:20pm: Lunch

MCLE: 0.50 hours

Keynote Speaker

Lic. Jorge Antonio Libreros Calderón, *Administrador Central de Auditoría Fiscal Internacional, Administración General de Grandes Contribuyentes, Mexico.*
(*Central Administrator of International Tax Audits, General Administration of Large Taxpayers, Mexico*)

[view the presentation »](#)

1:30pm-3:00pm: 3A

MCLE: 1.50 hours

* English

Taxation of Cross Border Financial Products (Derivatives, Annuities, Life Insurance)

[view the presentation »](#)

Moderator

John Forry, Esq.
University Professor and Counselor at Law

Speakers

Ted Setzer, Esq.
Office of the Associate Chief Counsel (International), Internal Revenue Service

Lic. Alejo Muñoz Manzo
Muñoz Manzo, Belaunzarán y Larrañaga, S.C.

Kim Majure, Esq.
Miller & Chevalier

1:30pm-3:00pm: Course 3B

MCLE: 1.50 hours

*English

Transfer Pricing: Current Developments in U.S., Canada and Mexico

[view the presentation »](#)

Moderator

Jim Hill, Esq.
Deloitte & Touche-Los Angeles

Speakers

Lic. Simón Somohano
Deloitte & Touche - Mexico

John Breen, Esq.
Office of the Associate Chief Counsel (International), Internal Revenue Service

Mr. Thomas A. Vidano
Office of the Associate Chief Counsel (International), Internal Revenue Service

3:00pm-3:15 pm: Coffee Break**3:15pm-4:30pm: Course 4A**

MCLE: 1.25 hours

* English

Cross Border Compensation Plans; Deferred Compensation, Retirement Plans, Bonus Plans and Non-Qualified Plans

[view the presentation »](#)

Moderator

Jon P. Schimmer, Esq.
Procopio, Cory, Hargreaves & Savitch LLP

Speakers

Zaitun Poonja, Esq.
Morgan Lewis

C.P.C. Alejandro Garcia Millan
Patrimonium

Mike T. Frank, Esq.
DLA Piper

Grace Fleeman, Esq.
Office of the Associate Chief Counsel (International,) Internal Revenue Service

3:15pm-4:30pm: Course 4B

MCLE: 1.25 hours

* Spanish

Mexico's Maquiladoras - PITEX Consolidation - New Statutory Rules for Manufacturers: U.S. and Canadian Tax Treatment under Revised Mexican Rules

[view the presentation »](#)

Moderator

Lic. Clemente Ranero-Puig
Mancera Ernest & Young

Speakers

Lic. Luis Carbajo
Baker & McKenzie - Ciudad Juárez

Lic. Roberto Schatan Pérez
Head of the Transfer Pricing Unit, SAT

Timothy Fitzgibbon, Esq.
Fenwick & West LLP

4:45pm-6:15pm: Course 5A

MCLE: 1.50 hours

* English

Complex Trust Taxation U.S., Canadian and Mexican (Foreign Beneficiaries and Trustees) - Accumulated Income

[view the presentation »](#)

Moderator

Rufus von Thülen Rhoades, Esq.
Adjunct Professor of Law, University of San Diego School of Law
Author, Rhoades & Langer, U.S. International Taxation and Tax Treaties

Speakers

Phil Webber, Esq.
Bull, Houser & Tupper, LLP

Lic. Mauricio Bravo Fortoul
Turanzas, Bravo y Ambrosi, S.C.

Patrick W. Martin, Esq.
Procopio, Cory, Hargreaves & Savitch LLP

4:45pm-6:15pm: Course 5B

MCLE: 1.50 hours

*English

**Overview of Mexican Tax System for Cross-Border Commercial Activities
(State Taxation)**

[view the presentation »](#)

Moderator

Liliana Sandoval, Esq.
Procopio, Cory, Hargreaves & Savitch LLP

Speakers

Lic. Luis Santos Theriot
*Santos, Elizondo, Cantu, Rivera, González, De la Garza Y Mendoza, S.C. -
Monterrey*

C.P.C. Daniel Cano
Gossler, S. C. – Tijuana

6:30pm-8:00pm Reception

Friday, February 16, 2007

7:30am Registration and Continental Breakfast

8:45am Introduction

*** Language Spoken (with translation available on some courses)**

9:00am-10:25am: Course 6A

MCLE: 1.25 hours

* English

**Interpretive Regulations After *Swallows Holding*: U.S. Filing Requirements
of Non-Resident Individuals, Foreign Corporations, Business Deductions
and Statute of Limitations**

Moderator

Patrick W. Martin, Esq.
Procopio, Cory, Hargreaves & Savitch LLP

Speakers

Phillip L. Jelsma
Luce, Forward, Hamilton & Scripps LLP

John Harrington
Deputy International Tax Counsel, U.S. Department of the Treasury

Richard D. Fultz, Esq.
Special Counsel, Office of Chief Counsel, Internal Revenue Service

9:00am-10:25am: Course 6B

MCLE: 1.25 hours *English

U.S. and Mexican Choice of Entity Selection for Mexican and Canadian Owners; Intersections of Subchapter C, K, and S.A., S. de R.L. and S.C.

[view the presentation »](#)

Moderator

Rufus von Thülen Rhoades, Esq.

Adjunct Professor of Law, University of San Diego

Author, Rhoades & Langer, U.S. International Taxation and Tax Treaties

Speakers

Frederic Adam, Esq.

Greenberg Traurig LLP

Liliana Sandoval, Esq.

Procopio, Cory, Hargreaves & Savitch LLP

Manuel Rujanov, Esq.

Thompson & Knight, LLP

Lic.Felipe E. Marrón Montané

Marrón, Martínez & Gallardo Abogados

10:25am-10:40: Break

10:40am-12:00pm: Course 7A

MCLE: 1.25 hours

* English

Recent Mexico-Canada Income Tax Treaty; U.S.-Mexico Income Tax Treaty (Exploring the Unexplored) - Commentary to the Treaties in Interpretation

[view the presentation »](#)

Moderator

Rufus von Thülen Rhoades, Esq.

Adjunct Professor of Law, University of San Diego School of Law

Author, Rhoades & Langer, U.S. International Taxation and Tax Treaties

Professor Herbert I. Lazerow

Professor of Law, University of San Diego School of Law

Speakers

C.P. Mauricio Monroy

Deloitte & Touche - Tijuana

Mary Voce, Esq.

Greenberg Traurig, LLP

Michael Colborne, Esq.

Thorsteinssons LLP

Lic. Alejandro Santoyo

Chevez, Ruiz, Zamarripa y Cia, S.C.

10:40am-12:00pm: Course 7B

MCLE: 1.25 hours

*English

The International Timing Problem: Mismatching of U.S. and Mexico

Income, Taxes, Credits and Deductions**Moderator**

Burgess Raby, Esq.
Raby Law Office

Speakers

Enrique Hernandez Pulido, Esq.
Procopio, Cory, Hargreaves & Savitch LLP

John Harrington, Esq.
Deputy International Tax Counsel, U.S. Department of the Treasury

Lic. Jorge Antonio Jiménez Cañizares –
Despacho Paras

12:15pm-1:20pm Lunch

MCLE: 0.50 hours

Keynote Speaker

Robert E. Herzstein, Esq.
Miller & Chevalier Chartered

1:30pm-2:45pm: Course 8A

MCLE: 1.25 hours

* English

Cross Border Tax Audits - Country to Country

[view the presentation »](#)

Moderator

Eric D. Swenson, Esq.
Procopio, Cory, Hargreaves & Savitch LLP

Speakers

Lic. Jorge Libreros Calderón
Administrador Central de Auditoría Fiscal Internacional del SAT, México

Sanford Blaze
International Tax Specialist, Internal Revenue Services

1:30pm-2:45pm: Course 8B

MCLE: 1.25 hours

*English

**Current Tax Developments in International Mergers and Reorganizations
(North to South)**

[view the presentation »](#)

Moderator

Jon P. Schimmer, Esq.
Procopio, Cory, Hargreaves & Savitch LLP

Speakers

Gretchen Sierra, Esq.
Deputy International Tax Counsel, U.S. Department of the Treasury

Mike DiFronzo, Esq.

Office of the Associate Chief Counsel (International), Internal Revenue Service

Michael Colborne, Esq.
Thorsteinssons LLP

Lic. Alejandro Barrera Fernandez
Basham, Ringe y Correa, S.C.

2:45pm-3:00pm: Coffee Break

3:00pm-4:30pm: Course 9A

MCLE: 1.50 hours

* English

International Tax Litigation – (Courts and Jurisdiction, Foreign Documents, Tax Returns and Internationally Exchanged Information as Evidence)

Moderator

Patrick W. Martin, Esq.
Procopio, Cory, Hargreaves & Savitch LLP

Speakers

William F. Colgin Jr., Esq.
Morgan, Lewis & Bockius LLP

Richard D. Fultz, Esq.
Special Counsel, Office of Chief Counsel, Internal Revenue Service

Dr. Adolfo Solis
Grupo Farjas Abogados Tributarios

M. Carr Ferguson
Visiting Professor of Law, University of San Diego School of Law

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