

**Don't miss this
important
foundation
course!**

U.S. International Transfer Pricing 101

**A two-day introduction and update with
live instruction on the U.S. transfer
pricing rules under Sec. 482**

**Register Early
& Save \$100**

**Register
Today!**

**Los Angeles • April 3 & 4, 2006 • LeMerigot Santa Monica
Miami (Coral Gables) • May 8 & 9, 2006 • Biltmore Hotel**

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Benefits of Attending this Course:

- Learn how the U.S. transfer pricing regime applies to related party sales and purchases of products by U.S. companies
- Find out how the IRS determines the amount of tax and penalties due on transactions with related parties, including conduit entities
- Obtain the latest information on when U.S. tax adjustments may be required for intercompany service or financing arrangements
- Determine if your company/client benefits under the new Proposed Cost-Sharing regs. or should retain its current licensing arrangements
- Receive an update on the latest IRS tools for resolving pricing controversies, including APAs, mediation, early referral and accelerated issue resolution
- Increase your knowledge of how transfer pricing influences your company's financial statement results after Sarbanes-Oxley
- Discover how to prepare a Transfer Pricing Study under the Sec. 482 regulations



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Up to 15 CPE/CLE Course Credits Available

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Monday, Day One

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

8:45 am **Managing the Corporate Transfer Pricing Function**

- How U.S. companies today are expected to comply with the Sec. 482 arm's-length standard – income shifting v. clear reflection of income
- When Sec.482 applies in the international context – definition of related party and application to pass-through entities
- Monitoring corporate data for documenting intercompany transactions – determining the Best Method
- Managing IRS audits - how penalties apply if you don't play by the IRS rules – interrelationship with the tax accounting rules

10:15 am **Refreshment Break**

10:30 am **Establishing an Arm's-Length Price for Sales and Leases**

- How to compute the Best Method for intercompany sales of products and inventory – use of an inter-quartile range
- What companies or products must apply the CUP, resale price or cost plus method – analysis of recent cases
- When the comparable profits method (CPM) applies on sales to or purchases from a related party
- Special issues in dealing with legal restrictions or adverse economic conditions – interrelationship with Sec. 1059A

12:15 pm **LUNCHEON**

1:30 pm **Arranging for Intercompany Transfers of Intangible Property**

- How intangible property is defined – interrelationship with Secs. 197 and 367(d) – who is the legal owner?
- Finding a comparable uncontrolled transaction (CUT) – using the CPM or profit split method
- Understanding the latest IRS cost sharing regulations – what costs are included and who are qualified participants
- Recent case law and IRS rulings – treatment of stock options in cost sharing arrangements

3:00 pm **Refreshment Break**

3:15 pm **Understanding the New IRS Rules for Intercompany Services**

- When a related party is required to charge for services – drafting an intercompany services agreement
- Treatment of stewardship or ancillary services – when you must impute a profit or mark-up on service costs
- What direct or indirect service costs can be charged to a related party – contingent consideration
- Determining the charge for services rendered as an integral part of the taxpayer's business

4:45 pm **Meeting Adjourns for the Day**

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Tuesday, Day Two

8:00 am **Continental Breakfast**

8:45 am **Preparing a Transfer Pricing Study**

- Documenting related party transactions to mitigate penalty assessments under Sec. 6662(e) and develop a global compliance solution
- Accessing economic data for comparable companies and conducting a statistical analysis
- Using software for preparing a transfer pricing study and leveraging in-house resources
- Completing an economical Transfer Pricing Study to meet reporting requirements in multiple taxing jurisdictions

10:00 am **Refreshment Break**

10:15 am **Resolving IRS Transfer Pricing Controversies**

- Verifying or measuring estimated transfer pricing charges – budget v. actual
- Who handles the audit - things the IRS economist will ask for on audit – dealing with the International Examiner (IE)
- Latest strategies for exam-level settlements: fast track mediation, early referral and accelerated issue resolution (AIR) procedures
- Things to think about before concluding the audit with the IE – use of set-off and exam level remedies

11:30 am **Contesting IRS Transfer Pricing Adjustments**

- Adjustments required to close the audit with the IRS – filing for relief with the Appeals Office
- Obtaining relief using collateral and correlative adjustments or offsetting accounting entries
- How the IRS uses constructive or triangular dividends to impose U.S. withholding taxes or tax foreign earnings
- Evaluating the hazards of litigation – when to use an attorney - choice of forum
- Protecting the statute of limitations in the U.S. and overseas - interrelationship with foreign tax credit benefits

12:30 pm **LUNCHEON**

1:30 pm **The Role of Transfer Pricing in Managing Your Global Effective Tax Rate**

- Country differences of comparability and re-aligning profits for market-based and technology intangibles
- How arm's-length pricing affects tax rate computations under FAS #109 – FASB
- Interpretation on Uncertain Tax Positions
- How Advance Pricing Agreements (APAs) can be used to provide certainty and consistency in financial results
- Planning opportunities for manufacturing, distribution and marketing activities, and centralized HQ and financing services

2:30 pm **Refreshment Break**

2:45 pm **Special Issues Involving Sec. 482 in Determining Benefits for Domestic Production and Export Income**

- Comparison of formulary apportionment for export sales v. separate reporting results under Sec. 482
- Understanding how the ETI and IC-DISC safe haven pricing rules operate - phase-out of ETI benefits in 2005
- How the rules for foreign sales and leasing income (FSLI) can be applied to maximize
- U.S. tax and foreign tax credit benefits
- Application of Sec. 482 in computing the new domestic production deduction under Sec.199

4:00 pm **MEETING ENDS**

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*If you are new to the Tax Department or the
International Tax area, you don't want to
miss this important foundation course!*

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Why You Should Attend: Transfer pricing in the United States continues to be a topic of major concern to tax executives at U.S. outbound and inbound multinationals. **In today's environment of increased accountability, corporate executives must understand global pricing policies and transfer pricing risks and exposures before certifying tax return results.**

Transfer pricing requires financial statement results to properly reflect profits between business units for tax and earnings forecasts. As a result, corporate tax and financial executives must establish effective internal controls and defend their pricing policies before their auditors and the IRS. Recent FAS interpretations on Uncertain Tax Risks will require full disclosure of transfer pricing positions and controversies.

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, transfer pricing in today's economic environment involves ascertaining the foreign tax credit implications of a price change and reconciling the tax and financial statement results.

Who Should Attend: CITE announces a new, basic level transfer pricing course for corporate tax executives and tax advisors from law and accounting firms. No prerequisites are required, although some knowledge of the U.S. international tax rules is recommended.

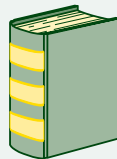
This two-day course is designed as a training session to introduce tax practitioners to the key reporting and compliance issues under Sec. 482 and the regulations. Many of our experienced faculty members have received CITE's STAR (Speakers with Top Attendee Ratings) Award and can answer your most technical transfer pricing questions.

Substitutions/Cancellations: A \$250 fee will apply to cancellations received less than 72 business hours prior to 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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See registration form or visit our website: www.citeusa.org



As a reference tool, all paid attendees receive a **FREE COPY** of CITE's **Transfer Pricing Sourcebook**

Published by the World Trade Executive, Inc. This 120-page paperback primer is edited by William H. Green, CITE, Inc., and is designed as an introduction to international transfer pricing.

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 at the following hotels:

Le Merigot - tel: (310) 395-9700
1740 Ocean Avenue, Santa Monica, CA 90401
Limited Time Reduced Rate \$239 single/double

Biltmore Hotel - tel: (305) 445-1926 or (800) 727-1926
1200 Anastasia Avenue, Coral Gables, FL 33134
Limited Time Reduced Rate \$185 single/double

Please contact the appropriate hotel and mention that you are attending the course listed under CITE. The block will be released approximately 30 days prior to the meeting, so make your reservation early. Your sleeping room is not included in the registration fee.

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CrossBorder Solutions is a leading developer of financial software solutions. Our solutions consist of powerful software, exceptional support services and continuing education programs, all designed to promote best practices in tax compliance and planning. CrossBorder's mission is to empower corporate taxpayers and service providers to better manage critical business functions by providing user-friendly, cost-effective software solutions.

Deloitte. Deloitte's Global Transfer Pricing Team. Rated #1 by Euromoney, Deloitte's multi-disciplinary 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

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