Updated to Include the New Relief Procedures for

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Earn up to 18 CE/CPE in International Tax

Tax Practice Pro, Inc's, Sixth Annual International Tax Program
ORLANDO, FLORIDA
October 31 & November 1, 2019

This two day seminar offers the challenging material practitioners are asking for at a reasonable price. Tax Practice Pro brings you the most knowledgeable speakers in the industry, speaking on their specific expertise.

Our program offers two tracks of material: a Fundamentals Track, designed for those with little or no experience in preparation and planning with international clients; and an Advanced Track which includes current topics for those working with international clients on a regular basis. Twelve of the credits in the Advanced Track are new material, never presented here, and taught by experienced speakers new to our program.

The program is held on a Thursday and Friday, allowing you to explore Orlando for the weekend. The Star Wars attraction opens at Disney August 31. Our event is held at the Orlando Airport Mariott Lakeside, 7499 Augusta National Drive, Orlando.

International Tax Fundamentals for Individual Clients

Thursday October 31, 2019 [Nine (9) CE]

1. Introduction to International Taxation - John Sheeley, EA
2. Reporting for FBAR and IRS Form 8938 - John Sheeley, EA
3. Foreign Earned Income Exclusion and Form 1116. - John Sheeley, EA
4. Reading and Invoking Tax Treaties. - Marina Hernandez, EA, CFP
5. Interviewing New and First Time Foreign Clients.- Marina Hernandez, EA, CFP

Friday November 1, 2019 [Nine (9) CE]

Marina Hernandez, EA, CFP (all sections)

1. Common Errors in Preparation of International Returns
2. Reviewing an Expat Tax Return for Tax Planning Opportunities
3. Foreign pension reporting on US tax returns.
4. Foreign business reporting on US tax returns.
5. Expatriation
6. Comprehensive Case Study

2019 Advanced International Tax Issues

Thursday,October 31, 2019 [Nine (9) CE]

1. Foreign Investment in Real Property Tax Act - Beth Lougen EA, USCTP
2, PFIC Masterclass - Beth Lougen EA, USCTP
3, GILTI & IRC 965 - Beth Lougen EA, USCTP
4. Choice of Entity for Foreign Investment in the US - Steve Ettinger, JD, LLM (Tax)
5. LB&I Examination Priority Update - Steve Ettinger, JD, LLM (Tax)

Friday, November 1, 2019

1. My Client Has Unreported Foreign Assets - Now What? Susan Anderson, EA
2. Overcoming Challenges in Culture When Working with Remote Foreign Clients - Elina Linderman, EA
3. Recognizing, Reporting and Repairing Foreign Trusts - Ruth Mattson, Esq.
4, Understanding Willfulness - Ruth Mattson, Esq.
4. IRC 482 Transfer Pricing for Small Practitioner - Alex Martin

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Meet the Instructors

Marina Hernandez, EA, CFP

Marina Hernandez is a Financial Planner and Investment Advisor with White Lighthouse Investment Management, an independent Investment Advisor specializing in cross-border planning, with a focus on US-Swiss cross-border issues. Marina is a CERTIFIED FINANCIAL PLANNER® and an enrolled agent. She completed her MBA in Corporate Finance and International Business at the University of Georgia's Terry College of Business in 1998. A native of Argentina, she holds a combined Bachelor's and Master's degree in Accounting from UCA, the Catholic University of Argentina.

Marina is a member of the Financial Planning Association (FPA) and the National Society of Accountants (NSA) and was named NSA's 2016 Tax Talker of the year for her contributions to the Tax Talk forum on international tax issues. She serves as a volunteer on the Professional Tax Advisory Council of American Citizens Abroad (ACA) and the Americans Citizens Abroad Global Foundation, a charitable organization that supports education and research on issues that affect Americans living abroad. She lives with her family in the greater Philadelphia area.

Mary Beth Lougen, EA, USTCP

Mary Beth Lougen EA USTCP is the President of American Expat Tax Services, a niche tax firm specializing in tax preparation and compliance resolution for taxpayers with international situations and Chief Operating Officer of Expat Tax Tools, Inc., an up and coming international tax software company that offers the **Form 8621 Calculator.** Her firm has the only commercially available software to prepare *Form 8621, Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund*.

Mary Beth has over 37 years of US Income Tax experience, working both in the United States and in Canada. Being a dual Canadian/ US citizen who lived on both sides of the border, she has personally dealt with the rigors of tax filing as a US Expat. Beth is uniquely in tune with the challenges and concerns faced by both the clients and the tax professional community enlisted to prepare international tax returns.

Mary Beth carries the **Enrolled Agent** designation which is the highest credential awarded by the IRS. Enrolled Agents, like attorneys and certified public accountants (CPAs), have unlimited practice rights in front of the IRS. She is also one of only 250 **United States Tax Court Practitioners** in the world, and has earned the right to represent taxpayers in the U.S. Tax Court with the same standing as an attorney by passing the equivalent of a 4 hour bar exam that includes a large section of substantive federal tax law.
She has been published by Bloomberg BNA and the CCH Journal of Tax Practice and

Procedure. She has mentored others studying for the US Tax Court exam, worked as part of the standard setting and question writing groups for the Special Enrollment Exam. In her spare time, she is currently attending the University of San Francisco School of Law completing her Masters of Legal Studies in Taxation.

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John Sheeley, EA, Founder

Chester, New York based John Sheeley, EA began his career in the tax industry in 1987, passing the IRS special enrollment exam in 1995. His career includes 13 years as a multi-unit franchisee of a national tax firm and 5 years as a tax manager at a regional CPA firm in New York. A National Tax Practice Institute fellow, John completed his undergraduate education at the State University of New York at Oswego.

John formed his current tax services firm in 2008, with a focus on the tax and representation needs of U.S. citizens living abroad, and non-resident alien entrepreneurs and entertainers living and working in the United States. The Firm prepares the occasional cannabis industry and crypto currency tax return.

John is also the founder of Tax Practice Pro, Inc, a national continuing education provider. His current teaching focus centers on taxation of legal marijuana businesses, problems of S corps, and taxation of non-resident aliens and those living abroad. He can be reached at john@taxpracticepro.com

STEVEN ETTINGER, JD, LLC

Steven Ettinger has been a tax attorney for over twenty years. A former IRS and US Department of Justice trial attorney, he has also served as in house tax counsel for several large international corporations. He has practiced international tax with KPMG and PricewaterhouseCoopers. He has lectured regularly in law schools over the past ten years. He joined the firm in 2008 in the role as Director of Tax Services.

Mr. Ettinger is a graduate of Yeshiva University (Bachelor of Science Degree in Accounting), Cardozo Law School (JD) and NYU School of Law (LLM, Taxation). He is a member of the New York and New Jersey bars.

Ruth Mattson, JD, LLM

Ruth Mattson, a partner, concentrates in the areas of international and multinational estate planning, multinational estate administration, sophisticated estate and business planning, local estate and trust administration, and tax compliance for individuals with assets outside the

United States.

Ruth engages in comprehensive planning with each client. She reviews each client's goals, family and financial circumstances, and recommends a plan to meet the client's objectives. Once the estate planning documents are executed, Ruth continues to work with the client to implement the plan.

For international matters, Ruth plans for non-citizen spouses and couples with multiple citizenships, including Qualified Domestic Trusts (QDOTs), gifting strategies, and analysis of the tax costs and benefits of citizenship and expatriation. She also advises clients regarding foreign property that clients currently own or expect to receive, and regarding foreign informational reporting and tax compliance for those assets.

Ruth is a lecturer at Boston University School of Law's Graduate Tax Program and frequently speaks on topics related to estate planning and U.S. taxation. She is a member of the Boston Estate Planning Council, the Society for Trusts and Estates Practitioners, and other estate planning and tax organizations.

Ruth is admitted to practice law in Massachusetts and Pennsylvania. She is a graduate of Boston University School of Law (LL.M. in Taxation, 2008) and Temple University Beasley School of Law (J.D., 2005).

Alex Martin

Alex Martin is the president of Productive Pricing LLC, a transfer pricing consultancy, with fifteen years of full-time transfer pricing experience. Prior to forming the company, Alex was a transfer pricing economist and director at PricewaterhouseCoopers LLP for over 12 years, working in the Washington

D.C., Melbourne, Australia and Detroit, Michigan offices. Alex has extensive experience working with companies addressing transfer pricing issues on a local and global basis

Productive Pricing is a full-service transfer pricing consultancy. Additional information may be found on the website http://www.productivepricing.com including a complimentary transfer pricing webinar.

Alex has been the lead transfer pricing economist on many major transfer pricing cases undergoing tax authority review for both transfer pricing audits and Advance Pricing Agreements (APAs).

As a transfer pricing director, Alex re-established the PricewaterhouseCoopers Detroit transfer pricing practice in 2004 working with both U.S. and foreign-owned multinational companies in many industries. He has experience assisting U.S., Japanese, German, Chinese, Australian, Canadian, Mexican, U.K., and Swedish companies address global intercompany pricing issues.

Alex has authored articles on tax and cash flow savings opportunities through proper transfer pricing planning. He has also spoken at numerous tax and legal seminars on addressing global and local transfer pricing issues.

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