

# **IRS and The George Washington University Law School To Sponsor Institute on International Tax Issues**

## **Announcement 2004–84**

The Internal Revenue Service announces the Seventeenth Annual Institute on Current Issues in International Taxation, jointly sponsored by the Internal

Revenue Service and The George Washington University Law School, to be held on December 9 and 10, 2004, at the J.W. Marriott Hotel in Washington, DC. Registration is currently underway for the Institute, which is intended for international tax professionals.

The program will present a unique opportunity for top IRS and Treasury officials and tax experts, and leading private sector specialists, to address breaking issues and present key perspectives on new developments. The first day will feature sessions on the following:

- Current Competent Authority Issues (with the Competent Authorities of France, Japan, the United Kingdom, and the United States);
- Application of Functional Analysis to Corporate Restructurings;
- Latest IRS Transfer Pricing Guidance;
- Off-Shore Service Centers; and
- Updates on Outbound Issues.

The Honorable Gregory F. Jenner, Acting Assistant Secretary (Tax Policy), U.S. Department of the Treasury, will deliver the luncheon address. The day will begin with an address by the Honorable George K. Yin, Chief of Staff, Joint Committee on Taxation.

The second day will focus on the following topics:

- Updates on Inbound Issues;
- Current Issues for Check-the-Box Planning;
- Cross-Border Mergers, Acquisitions, and Financing Transactions; and
- Application of Tax Shelter Rules to International Transactions.

The Honorable Mark W. Everson, Commissioner, Internal Revenue Service will deliver the luncheon address. The second day will also include an “Ask the IRS” panel featuring senior officials from the Service.

Those interested in attending or obtaining more information should contact The George Washington University Law School, at <http://www.law.gwu.edu/ciit>.