

FDII: New proposed regulations – guidance and questions

Federal Bar Association breakfast briefing



**Federal Bar
Association**

Section on Taxation

Join the FBA Section on Taxation and speakers from Eversheds Sutherland, KPMG and the Alliant Group as they discuss the recently proposed regulations under section 250 of the Internal Revenue Code on foreign-derived intangible income (FDII) with attorneys from the IRS and Treasury. The discussion will include a general overview and will highlight issues requiring clarification or further explanation.

Date: Thursday, April 4, 2019

Time: 7:30 a.m. Breakfast; Program from 8:00–9:30 a.m.

Location: Eversheds Sutherland, 700 Sixth Street, NW, Suite 700, Washington, DC 20001

Register: Contact [Kathleen Waddell](mailto:kathleenwaddell@eversheds-sutherland.com) (kathleenwaddell@eversheds-sutherland.com)

CLE Credit: Available in NY, pending in VA

Speakers:

Taylor Kiessig, Eversheds Sutherland

Marissa Rensen, Internal Revenue Service – Office of Chief Counsel

Danielle Rolfes, KPMG

Robert Russell, Alliant Group

Gary Scanlon, Office of International Tax Counsel, US Department of the Treasury

Learning Objectives:

- to understand the recently proposed regulations under section 250 of the Internal Revenue Code.
- to assist tax practitioners by exploring what transactions generate qualifying income under the proposed regulations.
- to analyze what requirements must be satisfied by taxpayers in order to qualify for the section 250 deduction.

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