

Part 1 of 5 International Tax Lunch Series

Navigating the Proposed Cloud Regulations - What Has Changed, and What Hasn't

**Thursday, September 19,
2019
12:00 p.m. to 2:00 p.m.**

D.C. Bar
901 4th Street NW

CLE Credit: **No**



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The panel will discuss the recently proposed regulations address digital content and cloud transactions. The proposed regulations would extend existing section 1.861-18 to all digital content, provide a rule impacting sourcing of sales of digital content, and provide rules for characterizing cloud transactions. The panel will discuss the potential impact of the regulations.

Sponsored by: International Tax Committee of the D.C. Bar Taxation Community
Cosponsoring Organizations: Eversheds Sutherland; Federal Bar Association.

Be sure to register for the rest of the series!

Thursday, Nov. 7, 2019 – Part 2 of 5: TBA

Thursday, Dec. 5, 2019 – Part 3 of 5: TBA

Thursday, Feb. 20, 2020 – Part 4 of 5: TBA

Thursday, March 12, 2020 – Part 5 of 5: TBA

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Speakers

- **Rafic Barrage**, Partner, Baker McKenzie
- **Robert Z. Kelley** (invited) Senior Counsel, Branch 6, Office of Associate Chief Counsel (International) Treasury department IRS, Chief Counsel
- **Wade Sutton** (invited); Senior Counsel, Office of the International Tax Counsel, Department of the Treasury
- **Carole Tello**, Partner, Eversheds Sutherland
- **Daniel Nicholas**, Partner, Eversheds Sutherland (Moderator)