CONTENTS:

PROGRAM SCHEDULE ........................................................................... 9

FACULTY BIOS ...................................................................................... 17

1. Tax Treatment of Transactions Involving Royalty- and Revenue-based Income Streams ............................................ 41
   Matthew A. Stevens
   Karla Johnsen
   EY

   Julio Jimenez
   PwC
   Kristen M. Garry
   Shearman & Sterling LLP
   Larry Silva
   Citigroup
   Viva Hammer
   Joint Committee on Taxation

3. New Proposed Regulations Address Tax Characterization of Credit Default Swaps and Other Financial Derivatives (September 18, 2011) ........................................................................... 83
   Submitted by:
   Rebecca Lee
   PwC

   Hannah Burke
   Jonathan Zelnik
   Denise Schwieger
   KPMG LLP
   L.G. “Chip” Harter
   Michael J. Harper
   PwC

   L.G. “Chip” Harter
   Rebecca E. Lee
   Jeffrey Maddrey
   PwC

7. Inherently Hedgeable: Hedging Foreign Currency Exposure Arising from the Branch Operations of a CFC ......................... 147
   L.G. “Chip” Harter
   Rebecca E. Lee
   David H. Shapiro
   PwC

   L.G. “Chip” Harter
   PwC

   L.G. “Chip” Harter
   Rebecca E. Lee
   PwC

10. The Modern Global Treasury Operation: Overview of Certain Tax Considerations (October 14, 2014) ............................... 217
    Justin Weiss
    Sam Chen
    Ivan Thomann
    KPMG LLP

    Raj Madan
    Skadden, Arps, Slate, Meagher & Flom LLP
12. Tax Controversy: Current Issues in Debt vs. Equity
(October 31, 2014) ........................................................................ 247
   Miriam L. Fisher
   Latham & Watkins LLP

INDEX ................................................................................................... 257

Program Attorney: Stacey L. Greenblatt