

Givner & Kaye
Thursday
Seminar Series

May 2015 thru June,
2015

Our MCLE & CE accredited series is held in our office, and by webinar, on the **1st & 3rd Thursday** of each month from **2:30pm to 4:00pm**. The series are a collaborative forum for professionals—attorneys, CPAs, financial advisors—to share *uncommon* knowledge, insights and practical “know-how.”

TO REGISTER for a webinar, or to attend a presentation, please call **Desiree Skelly** at

310-207-8008 or e-mail us: **brucegivner@givnerkaye.com**.

- Parking will be validated.
- Refreshments will be served.
- Continuing Education Credit: One hour for tax topics.

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MAY 7TH: Everything You Always Wanted To Know About Section 482 And Transfer Pricing Problems (And The Related International Tax Planning Opportunities) But Were Afraid To Ask

Bruce Givner, Esq.

Givner & Kaye, A Professional Corporation



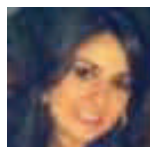
Section 482 dates back to 1921. Perhaps the most powerful weapon of the IRS, it consists of two sentences. Congress’s intent was (1) to prevent tax evasion by the manipulation of transactions between business entities controlled by the same person(s), and (2) even where no tax evasion motive is present, to ensure that the tax liability of the controlled business entities is based on their “true” income. Most people think of this in the context of a U.S. parent overpaying a foreign subsidiary located in a low-tax jurisdiction so as to “bury” profits abroad. However, the IRS applies Section 482 with equal vigor domestically, e.g., when an operating business overpays for insurance offered by its captive insurance company. We will discuss some problems of interpretation under the statute; interpreting the arm’s length standard in the regulations; the best method rule; and some examples.

Bring your questions and concerns.

May 21st: Everything You Always Wanted To Know About The Offshore Voluntary Disclosure Program And Foreign Bank Account Reports But Were Afraid To Ask

Neda Barkhordar, Esq.

Givner & Kaye, A Professional Corporation



The IRS has been charged by the Department of Treasury with finding taxpayers who have failed to report taxable income on undisclosed non-U.S. bank accounts. Those who have simply failed to file “FBARs” – foreign bank account reports – are not the target. Those people can simply file the later reports. However, if you both failed to file the FBAR – now FinCen 114 – and failed to report significant amounts of taxable income, you are in danger of being criminally prosecuted. The longer you delay, the more likely it is that you will face not merely significant fines for the FBAR and tax penalties for the unreported income, but also criminal prosecution. There are now at least three alternative programs under which you might qualify. Neda will discuss all the alternatives and answer all your questions. The IRS will eventually get to every bank in the world, so the longer you wait, the worse your situation will be.

Bring your questions and concerns.

About Givner & Kaye

When CPAs, financial planners and estate planning lawyers have clients with difficult wealth planning situations, they want Givner & Kaye to be part of the planning team. We collaborate with other professionals - attorneys, financial planners, accountants, stockbrokers, and insurance professionals - to serve the specialized planning needs of individual families.

We have maintained the same close working relationship with important referral sources for over three decades, with newer ones joining each decade. That continuity and respect is important in providing a stable, intimate and friendly atmosphere for our clients.

Contact Bruce Givner or Owen Kaye for more information about Givner & Kaye's services at:
310-207-8008 or
Bruce@GivnerKaye.com ;
Owen@GivnerKaye.com



JUNE 4TH: Everything You Always Wanted To Know About Domestic Asset Protection Trusts But Were Afraid To Ask

Bruce Givner, Esq.

Givner & Kaye, A Professional Corporation



Everyone has heard the supposed benefits of setting up an asset protection trust in Nevada or one of the other states that encourage creditor protection planning, e.g., Delaware, Wyoming, etc. In some situations they can be quite helpful, e.g., when the assets to be protected are liquid and can be moved out of California. However, even when the assets are liquid, one question is whether you would be better off with a non-U.S. trust (the principal problem with a non-U.S. trust is getting a bank account opened outside the U.S.). If you are a California resident trying to protect California real property, a Nevada asset protection trust offers protection only if the plaintiff is an idiot. Let's discuss the benefits of a domestic asset protection trust; the several types of domestic asset protection trusts; the potential pitfalls; and the setup and on-going costs.

Bring your questions and concerns.

A SNEAK PEEK AT OUR UPCOMING SEMINARS

June 18th: The Top 10 Preparer And Other Tax Penalties: Not Going To Jail But It Still Hurts

Bruce Givner, Esq.

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