

News, Events & Publications

Robert Moore

Articles

- Author, “Treasury Issues Temporary Regulations On Distribution of Controlled Corporation Stock Acquired in a Transaction Under Section 355(a)(3)(B),” *Baker & McKenzie’s Tax News and Developments*, February 2009, at 5
- Co-author, “United States: Final Dual Consolidated Loss Regs Issued,” *Tax Planning International Review*, BNA International Inc., London, England, May 2007, at 21
- Co-author, “Final Dual Consolidated Loss Regs Issued,” *Baker & McKenzie’s Tax News and Developments*, April 2007, at 2
- Author, “IRS Issues New Final Regulations on Withholding by Foreign Partnerships Under Section 1446 Allowing Partnership to Apply Preferential Rates,” *Florida Bar Tax Section Bulletin*, February 2006, at 11
- Author, “Notice 2005-90 Provides Favorable Guidance for Foreign Tax Credits on Back-to-Back Computer Program Licensing Arrangements Subject to Code Section 901(I),” *Baker & McKenzie’s Tax News and Developments*, February 2006, at 5
- Author, “Second Circuit Affirms Tax Court’s Treatment of Cross-Chain Stock Sales,” *Baker & McKenzie’s Tax News and Developments*, December 2004, at 15

Presentations

- Co-presenter, “Canadian Planning,” *14th Annual International Tax & Trust Training Program*, Miami, FL, 17-18 October 2013
- Co-presenter, “Update on FATCA (Draft Regulations and Trustees) and US Reporting Obligations: Who Must File? When and How?” *Baker & McKenzie’s 12th Annual International Tax & Trust Training Program*, Miami, FL, 13 October 2011
- Co-presenter, “A Day In The Life Of A Corporate Tax Department – Post Hopscotch Tax Planning,” *2011 Tax Planning & Transactions Workshop*, New York, NY, 24 June 2011
- Presenter, “Florida Bar Tax Law Certification: International Tax Review Course & Update,” Tampa, FL, 5 November 2010
- “Handling Tax Investigations and Audits,” *Baker & McKenzie’s 11th Annual Tax & Trust Training Program*, Miami, FL, 1 and 2 November 2010
- “M&A Transactions: Tax & Non-tax Restructuring,” New Orleans, LA, 4 March 2010

- “Non-Grantor Trusts and Their PFIC Solutions for US Beneficiaries,” *Baker & McKenzie’s 9th Annual International Tax and Trust Training Program*, Miami, FL, 3 October 2008
- “FIRPTA Developments, Pitfalls, and Planning Opportunities,” *TPT Technical Training & Business Development Seminar*, Cambridge, MA, 21-23 August 2008
- “Final 1446 Regulations on Certification of Partner Level Deductions and Losses,” *Florida Bar Tax Section – International Subdivision Conference Call*, 29 May 2008
- “Tax-Efficient Structuring of U.S. Real Estate Investments for Non-U.S. Clients,” *Baker & McKenzie’s Open Seminar for Global Private Bankers*, New York, NY, 31 January 2008
- “Introduction to International Tax: Subpart F, PFICs, Foreign Tax Credits, and Outbound Transfers of Stock and Assets,” *Tax Executive Institute New Orleans Chapter Meeting*, New Orleans, LA, 22 January 2008
- “Taxable and Tax Free Mergers, Acquisitions and Dispositions,” *Tax Executive Institute New Orleans Chapter Meeting*, New Orleans, LA, 22 January 2008
- “Unique Issues of Inequality: When Outside Value Does Not Equal Inside Value,” *Baker & McKenzie’s Pass-Throughs Subpractice Group Conference Call*, 1 November 2007
- “Recent Developments Concerning Portfolio Debt: IRS Final Rules (T.D. 9323) on Exclusion from Gross Income of Portfolio Interest Paid to Non-resident Aliens in Partnerships,” *Florida Bar Tax Section – International Subdivision Conference Call*, 30 May 2007
- “Planning Strategies for Mexican Families,” *Baker & McKenzie’s 7th Annual International Tax and Trust Training Program*, Miami, FL, 16 November 2006
- “Planning Strategies for Brazilian Families,” *Baker & McKenzie’s 7th Annual International Tax and Trust Training Program*, Miami, FL, 16 November 2006
- “Recent Developments in International Tax and Reporting,” *Florida Bar Tax Section Annual Meeting*, Amelia Island, FL, 4 July 2006
- “Trusts, Companies and the U.S. Beneficiary,” *Baker & McKenzie’s 6th Annual International Tax and Trust Training Program*, Miami, FL, 10 November 2005
- “Marketing Offshore Insurance to Latin America: Marketing to Latin America and the New Florida Exemption,” *Baker & McKenzie’s 6th Annual International Tax and Trust Training Program*, Miami, FL, 10 November 2005

Amicus Brief

- Robert Moore, Megan Renze, et al., Amicus Curiae Brief Filed on Behalf of the Children to District Court of Appeal of Florida, Third District *Florida Department of Children and Families vs. In Re: Matter of Adoption of X.X.G. and N.R.G.*, (No. 08-3044)