



Course	Certified International Tax Analyst - CITA
Instructor	Certified American Academy Instructor
Descriptions	This CITA Designation course focuses on the global markets and analysis thereof while also preparing the professional to understand global tax and policy issues. It presents invaluable tools and techniques for market analysts who analyze such data, along with specialist issues including Lawyers, CFOs, Executives, Manager, financial managers, financial planners, portfolio managers, hedge fund managers, professionals in mergers and acquisitions, equity research professionals. The world recognized American Academy of Financial Management ® (AAFM) awards the certification and accreditation for this program. A formal professional designation will be provided by the AAFM ® in recognition of successful completion of the course, along with the status as fellow member of the Academy. On satisfactory completion of the course you will be entitled to use the designation CITA Certified International Tax Analyst credential – on your business cards. As a keen financial professional looking to constantly enhance it is necessary to participate in the CITA program that will provide unique but essential international tax skills while providing a valuable qualification that can be used in the market place – Board Certification & Accreditation in International Tax.
Objectives	Learn Key Concepts in International Tax, Treaties, analysis.



	Understand the legal and international law principles of corporate valuations and finance against market operations Examine other areas in compliance, financial crimes, and AML.
Target Audience	• Lawyers and Counsellors • Executives & Private Bankers • Wealth Managers and Analysts • Retail Branch Managers • Corporate Account Managers • Family Office professionals • Brokerage and Market Analysts • Investment Advisors and Financial Planners • Investment Managers and Analysts • Stock Market Professionals • Portfolio and Asset Managers • Financial Marketing Professionals • Heads of Financial Accounts • Financial Controllers • Operation and Planning Managers • Research Officers and Media Professionals
Duration	3 Days

Course Contents and Descriptions

Module One

International Tax & Tax Treaties

Designed for tax lawyers, accountants, in-house tax planners, government officials, and other professionals who deal, or want to deal, with tax matters, this course provides an overview of global tax planning. It will examine sources of law; fiscal jurisdiction; the determination of taxable income for natural persons, corporate entities, business operations, and different types of income; how tax treaties affect the exercise of fiscal jurisdiction and limit the imposition of tax; and the problem of double taxation, including how jurisdictions may mitigate double taxation (and double-dipping of deductions and losses) under local law and tax treaties. The course also covers tax diagnostics for the multi-national enterprise (MNE) and the impact of politics and economics on tax policy. Tax treaties will be discussed both as a tool of tax avoidance for tax planners and as a

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THE AMERICAN ACADEMY OF FINANCIAL MANAGEMENT-AAFM

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tool for tax compliance, enforcement, and information collection by revenue authorities. The OECD, UN and US model tax treaties are used as teaching tools due to their overwhelming effect on international treaty policy, and other treaties are also studied from both a case law and case study perspective. Topics also include: interpretation and definitions of articles and terms; effective application; taxation of investment income; taxation of license fees and royalties; treaty shopping; limitation of benefits; an in-depth approach to the permanent establishment; allocation of income between related parties; non-discrimination toward foreigners; the 1992 United States-Netherlands treaty as an anti-avoidance model; and new treaty developments, such as TIEAs.

Module Two

International Tax & Financial Centers

This global financial services course focuses on the eleven to fifteen trillion US dollars - approximately half the world's money supply - that flow through and are managed by firms in international (offshore) financial centers such as The United Kingdom, Switzerland, USA, The Netherlands, Hong Kong, Singapore, Cayman Islands, Bermuda and Mauritius. The course takes an in-depth comparative analysis of some of the best known offshore jurisdictions from the viewpoint of the planner, the client, and the tax official. Students will examine both tax incentives that promote the effective use of international structures for mitigation, and the activities of non-compliant persons. Topics include due diligence; offshore planning structures such as asset protection trusts and MNE holding and investment companies; planning techniques [e.g., back-to-back finance, licensing agreements, cross-border double dip leasing; corporate inversions]; comparative regional and jurisdictional analysis; multinational offshore operations [e.g., treasury management]; offshore vehicle strategy such as re-insurance and private banking; licensing for offshore service providers and trustees. Using client-based case studies, students will be required to research the tax systems and rules in various countries in finding solutions, and will be introduced to the techniques of international tax planning.



Module Three

Anti-Avoidance Legislation & Tax Risk Management

This course in Anti-Avoidance Legislation and Tax Risk Management comparatively examines the general legal principles, tax regulations, case law, and audit procedures concerning anti tax-avoidance and tax risk mitigation in many OECD countries, and the ethical issues often confronted by practitioners. Issues concern economic substance; business purpose; economic benefit; abuse of law; assignment of income; thin capitalization and earnings stripping; anti-deferral regimes like control foreign company legislation, taxation of passive investment income held in foreign entities, and foreign trust regimes; anti-tax haven regimes; and other anti-avoidance legislation. Tax risk management also considers intra-group communication, establishing tax department operations, compliance programs, among other practices required for tax counsel.