TABLE OF CONTENTS

VOLUME 1

1. Taxation of Nonresident Aliens 1
   By Sanford H. Goldberg
   Table of Contents 2
   Study Material 5

   By Virginia F. Coleman
   Options for a Nonresident Alien to Own U.S. Investment Real Estate 76

3. Foreign Trusts and Alternative Vehicles 79
   By Henry Christensen, III

4. Outbound Transfers Code Sections 679 and 684 109
   By Robert C. Lawrence, III
   Table of Contents 110
   Study Material 111

5. U.S. Taxation of Foreign Trusts, Trusts with Non-U.S. Grantors and Their U.S. Beneficiaries 135
   By Ellen K. Harrison, Elyse G. Kirschner, and Carlyn S. McCaffrey
   Table of Contents 137
   Study Material 141

6. Planning for Transfers to Non-Citizen Spouses 219
   By Douglas L. Siegler and Lloyd Leva Plaine
   Table of Contents 220
   Study Material 227
7. Thinking Outside the Box: U.S. Federal Income Tax Issues for Trusts and Estates That Own Shares in Foreign Corporations  
   By M. Read Moore  
   Table of Contents  
   Study Material  

   By Douglas N. Varley  

9. Ethical Issues in Offshore Planning: The Practitioner Increasingly Squeezed  
   By Bruce Zagaris  
   Table of Contents  
   Study Material  
   Presentation Slides  

VOLUME 2  

10. The Final State of Expatriation?  
    By Michael G. Pfeifer  

11. Asset Protection Trusts (APTs): Non-Tax Issues  
    By Frederick J. Tansill  
    Table of Contents  
    Study Material  
    Exhibit 1: No U.S. Connections Allowed With an Offensive Target? Wrong! Use Onshore Contacts  
    Exhibit 2: The Ruse That Roared  
    Exhibit 3: Sample Letter of Wishes  
    Exhibit 4: Affidavit of Solvency  
    Exhibit 5: In Terror War, Privacy vs. Security  
    Exhibit 6: What ACTEC Fellows Should Know About Asset Protection  
    Exhibit 7: Divorce Law Island Castaway  
    Exhibit 8: Litigation Boom Spurs Efforts to Shield Assets  
    Exhibit 9: Shelter From the Storm  
    A Jurisdictional Comparison of Potential Situses for Asset Protection Trusts  
    Exhibit A: Affidavit of Solvency and Indemnity: Gibraltor Registered Trust  
    Exhibit B: Confidential Information Form and Fees Agreement  
    Exhibit C: Estate Plannet Asset Protection Trust  
    Exhibit D: Trustees Services  
    Exhibit E: Partnership Asset Structure  
    Exhibit F: Real Estate Equity Investment Structure
12. **Developments in Offshore Tax Compliance: Practitioner View**
   By Andrew H. Weinstein
   - Tax Evasion
   - U.S. Department of Justice Tax Division Criminal Tax Manual 2008
   - Assessment and Collection of U.S. Taxes From Non-U.S. Taxpayers
   - IRS Strategic Plan

13. **Voluntary Disclosure and UBS Settlement Links to Publicly Available Records**
    Submitted by John C. McDougal

14. **U.S. Taxation of Foreign Trusts with Non-U.S. Grantors and Their U.S. Beneficiaries**
    Grantor Trusts with Foreign Grantors-supplemental material
    By Ellen K. Harrison

15. **Taxation of Nonresident Aliens**-supplemental material
    By Michael J. Miller

16. **Taxing Foreign Nongrantor Trusts and Their U.S. Beneficiaries and Grantor Trusts with Foreign Grantors**-supplemental material
    By Ellen K. Harrison and Carlyn S. McCaffrey

17. **Developments in Offshore Tax Compliance**-supplemental material
    By John C. McDougal and Andrew H. Weinstein

18. **Effect of Tax Treaties on U.S. Activities of Nonresidents**-supplemental material
    By Joseph S. Henderson

19. **Questions for Ethics Roundtable**-supplemental material
    By Michael G. Pfeifer

20. **International Philanthropy**-supplemental material
    By Doug Varley and Michael Durham