



News, Events & Publications

Daniel Hudson

Presentations

- Co-presenter, "Navigating the Effectively Connected Income Tax Regime," Strafford Continuing Education Webinars, Miami, Florida, 23 March 2017
- Co-presenter, "Moving to the United States: How to navigate obstacles in a world of devaluation and political uncertainty," Baker & McKenzie's 17th Annual International Tax & Trust Training Program, Coral Gables, Florida, 27-28 October 2016
- Co-presenter, "Foreign Investment in US Real Estate: The Two Tier Partnership (and beyond)," Baker & McKenzie's 17th Annual International Tax & Trust Training Program, Coral Gables, Florida, 27-28 October 2016
- Co-presenter, "Foreign Investment in US Real Estate," STEP Presentation, San Francisco, California, 16 March 2016
- Co-presenter, "FATCA: Lessons learned so far," 16th Annual International Tax & Trust Training Program, Miami, Florida, 15-16 October 2015
- Co-presenter, "Tax Planning for Brazilian families," 16th Annual International Tax & Trust Training Program, Miami, Florida, 15-16 October 2015
- Speaker, "The Long and Winding Road: US Immigration Planning: How to Combine Immigration Rules with US Tax Planning," 16th Annual International Tax & Trust Training Program, Miami, Florida 15-16 October 2015
- Presenter, "BEPS: Relevance to Wealth Management," 37th Annual North America Tax Conference, Coronado, California, 8 January 2015
- Co-presenter, "How to purchase real estate in the US," 15th Annual International Tax & Trust Training Program, Miami, Florida, 30 September 2014
- Presenter, "Update on Section 1411, the New Investment Income Tax," Florida Bar Tax Section Organizational Meeting, Amelia Island, Florida, 3-6 July 2014
- Co-presenter, "The Changing Face of Global Tax Planning- The Impact of, and Preparation for, FATCA by Multinational Corporations," Baker & McKenzie 2014 Tax Planning and Transactions Workshop, 22 April 2014 in New York, New York and 25 April 2014 in Chicago, Illinois

- Co-presenter, "Tax Traps: US Citizenship by Derivation," Baker & McKenzie Breakfast Briefing, Zürich, Switzerland, 24 January 2013
- Co-presenter, "New Line in the Sand: An Update on Global Transparency, Automatic Exchange and Confidentiality of Information," Baker & McKenzie Breakfast Briefing, Zürich, Switzerland, 23 October 2012
- Co-presenter, "Strategies for Latin Americans to Come Clean Before the Tax Man," 14th Annual International Tax & Trust Training Program, Miami, Florida, 17-18 October 2013
- Co-presenter, "Tax Residency: US, UK and Canadian Perspectives," 12th Annual International Tax & Trust Training Program, Baker & McKenzie, JW Marriott, Miami, Florida, 13 October 2011
- Co-presenter, "How to Minimize US Taxes of Foreign Clients' Investments in US Real Estate and Businesses," Naples Area Board of Realtors, Global Network, Naples, Florida, 28 April 2011
- Co-presenter, "Managing New US Tax Law Changes," 11th Annual International Tax & Trust Training Program, Baker & McKenzie, JW Marriott, Miami, Florida, 1 November 2010
- Co-presenter, "Planning for Mexican Residents," 10th Annual International Tax & Trust Training Program, Baker & McKenzie, Conrad Hotel, Miami, Florida, 2 October 2009
- Co-presenter, "The Obama Administration's Tax Policy: What Lies Ahead and How Will This Effect International Clients and You?," 10th Annual International Tax & Trust Training Program, Baker & McKenzie, Conrad Hotel, Miami, Florida, 1 October 2009
- Presenter, "Section 367 Temporary and Proposed Regulations: Application of Code Section 367 to Cross-border Intragroup Stock Sales Implicating Code Section 304," Baker & McKenzie – Multiple Office Tax Conference Call, Miami, Florida, 1 May 2009
- Co-presenter, "The New U.S. Exit Tax," 9th Annual International Tax and Trust Training Program, Baker & McKenzie, Miami, Florida, 2 October 2008

Articles

- Co-author, "Provisions Targeting "Base Erosion": The BEAT and Other Deductions Limited Rules," Baker McKenzie North America Tax Practice Group Newsletter, February 2018
- Co-author, "198 A Grecian Tragedy for the IRS: Tax Court Rejects Rev. Rule. 91-32," Journal of Taxation, November 2017
- Co-author, "IRS Applies Section 956 Anti-Abuse Rule to Loan Funded Through a Partnership with CFC Partners," Baker & McKenzie North American Tax Practice Group Newsletter, June 2014



- Author, "Lowering the FBAR," STEP Journal, March 2013
- Author, "United States Continues to Clamp Down on Undeclared Foreign Bank Accounts," Baker & McKenzie Tax News and Developments, December 2012
- Author, "FBAR penalty case reversal and the civil willfulness standard," Journal of International Taxation, November 2012
- Author, "FBAR penalty case reversal and the civil willfulness standard under Title 31: No intent necessary?," Baker & McKenzie Private Banking Newsletter, September 2012
- Co-author, "Proposed Regs Would Require US Financial Institutions to Report Bank Deposit Interest Income for all Non-Resident Alien Individuals," Baker & McKenzie Tax News and Developments, April 2011
- Co-author, "Stop Tax Haven Abuse Act Re-introduced in US Congress," Baker & McKenzie Private Banking Newsletter, April 2009
- Author, "Proposed Regulations Under Code Section 108(e)(8) Contain Helpful Guidance for Issuances of Partnership Interests," Baker & McKenzie Tax News and Developments, December 2008