

**TEI-SJSU High Tech Tax Institute (32nd Annual)**

**November 7 & 8, 2016**

Crowne Plaza Cabana, 4290 El Camino Real, Palo Alto, CA

<http://www.tax-institute.com/>

**Monday November 7**

<b>Time</b>	<b>Topic</b>	<b>Presenters</b>
7:30 – 8:20	Registration & refreshments	
8:20 – 8:30	<b>Welcome</b>	Eli Dicker, Executive Director – <i>Tax Executives Institute (TEI)</i> Eric Johnson, Tax Director – Ross Stores; President – <i>TEI Santa Clara Valley Chapter</i> Annette Nellen, MST Program Director - <i>SJSU</i>
8:30 – 10:00	<b>International High Technology U.S. Tax Current Developments</b> Comprehensive review of developments relevant to high tech companies.	Jim Fuller, Partner - <i>Fenwick &amp; West LLP</i>
10:00 – 10:20	Break	
10:20 - noon	<b>BEPS in Action</b> The new framework for the OECD’s base erosion and profit shifting project for tax has significant impact on tax compliance and planning. The need to “defend” company profits and the country of attribution is crucial for international tax planning. This panel will address the latest developments in BEPS, key implementation considerations, and the relevance to US business tax reform.	Jim Carr, Partner - <i>KPMG</i> Cabell Chinnis, Jr., Partner – <i>Mayer Brown LLP</i> Gabe Gartner, Principal – <i>PwC</i> Adam Halpern, Partner - <i>Fenwick &amp; West LLP</i> Michael Patton, Partner – <i>DLA Piper LLP</i> Gary Sprague, Partner – <i>Baker &amp; McKenzie LLP</i>
Noon – 12:40	<b>Lunch</b>	
12:40 – 1:35	<b>Luncheon speaker</b>	Douglas W. O'Donnell Commissioner, IRS LB&I Division Internal Revenue Service
1:40 – 3:30	<b>BEPS Reporting and Compliance Considerations</b> Beyond tax compliance and planning, BEPS also affects financial reporting and disclosures. This panel examines these considerations along with data management, country-by-country reporting, examination considerations, and appropriate technology for compliance.	Kara Boatman, Principal - <i>KPMG</i> Jay Das, Principal – <i>Deloitte Tax LLP</i> David Nickson, Principal – <i>PwC</i> Bernadette Pinamont, Director, Chief Tax Office - <i>Vertex Inc.</i>
3:30 – 3:45	Break	
3:45 – 5:15	<b>New Again – The Latest in LB&amp;I Restructuring and Examination Approach</b>	Pat Chaback, Executive Director - <i>EY</i>

	<p>The restructuring will be explained along with its relevance to current and future examinations. Issue “campaigns,” staffing and other changes will be addressed.</p>	<p>Kimberly Edwards, Director, Western Compliance – IRS  Larry Langdon, Partner – <i>Mayer Brown LLP</i>  Jean A. Pawlow, Partner – <i>McDermott Will &amp; Emery LLP</i>  Tony Shabazz, Program Manager, Western Compliance, LB&amp;I Division – <i>IRS</i>  Gloria Sullivan, Director, Financial Institutions &amp; Products, LB&amp;I - <i>IRS</i></p>
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**Tuesday November 8**

Time Slot	Topic	Presenters
7:30 – 8:15	Registration & coffee	
8:15 – 9:30	<p><b>Accounting for Income Taxes</b>  Update and guidance on issues involving stock options and other equity compensation, employee mobility and tax reform.</p>	<p>Christina Edwall, Senior Manager – <i>Deloitte Tax LLP</i>  Perry Leslie, Partner - <i>KPMG</i>  Lindsey Newbern, Partner - <i>PwC</i>  JJ Schneider, Partner – <i>Grant Thornton</i></p>
9:30 – 10:30	<p><b>A Global Review of Tax Incentives</b>  Developments and practical considerations in using a variety of R&amp;D, innovation, manufacturing and other incentives of the US and several other countries will be covered.</p>	<p>Kevin Dangers, Partner - <i>EY</i>  Rod Donnelly, Partner – <i>Morgan, Lewis &amp; Bockius LLP</i>  Steven Shee, Vice President – Global Tax and Government Relations – <i>SanDisk</i></p>
10:30 – 10:45	Break	
10:45 - noon	<p><b>BREAKOUT A</b>  <b>Hot State Tax Topics</b>  The latest hot spots in state taxation will be discussed including tax havens, incentives, sourcing, nexus, embedded software, mobile workforce, and the impact of BEPS.</p> <p><b>BREAKOUT B</b>  <b>Transfer Pricing</b>  The relevance of <i>Altera</i> and other decisions expected in 2016 in terms of planning, practice, valuation, litigation strategies and financial disclosure will be addressed. The new Section 482 regulations and recent developments in Advance Pricing Agreements will also be discussed.</p>	<p>John Clausen, Director – <i>Moss Adams</i>  Carl Erdmann, Counsel – <i>Skadden, Arps, Slate, Meagher &amp; Flom LLP</i>  Jerry McTeague, Partner – <i>Deloitte Tax LLP</i>  Brian Pedersen, Partner – <i>Alvarez &amp; Marsal Taxand LLC</i></p> <p>Fred Chilton, Managing Director - <i>KPMG</i>  Drew Crousore, Partner - <i>Baker &amp; McKenzie LLP</i>  Paul Dau, Counsel – <i>McDermott Will &amp; Emery LLP</i>  Matt Kramer, Counsel – <i>Skadden, Arps, Slate, Meagher &amp; Flom LLP</i>  Sanford Stark, Partner - <i>Morgan, Lewis &amp; Bockius LLP</i></p>
12 – 12:40	<b>Lunch</b>	

12:40 - 1:25	<b>Luncheon Speaker</b>	Pascal Saint-Amans, Director – <i>Centre for Tax Policy and Administration, OECD</i> (Paris) <a href="#">[bio]</a>
1:30 – 3:00	<p><b>BREAKOUT C</b>  <b>Dealing with New IRS Processes with Q&amp;A</b>  This is an opportunity to consider what is new and ask questions of individuals from various IRS offices, with an emphasis on LB&amp;I activities. Topics include the restructuring, new issue identification approach, and examination of foreign payment practices and withholdings.</p> <p><b>BREAKOUT D</b>  <b>Section 385 Regulations</b>  Why were these regulations issued, who is affected and for what transactions?</p>	<p>Pat Chaback, Executive Director - <i>EY</i>  Paul DiSangro, Partner - <i>Mayer Brown LLP</i>  Kimberly Edwards, Director, Western Compliance – <i>IRS</i>  Andy Mattson, Partner – <i>Moss Adams</i>  Tony Shabazz, Program Manager, Western Compliance, LB&amp;I Division – <i>IRS</i>  Gloria Sullivan, Director, Financial Institutions &amp; Products, LB&amp;I - <i>IRS</i></p> <p>Nate Giesselman, Partner – <i>Skadden, Arps, Slate, Meagher &amp; Flom LLP</i>  Jill Harding, Partner – <i>Alvarez &amp; Marsal Taxand LLC</i>  Jimmy Man, International Tax Partner – <i>Deloitte Tax LLP</i>  Eric Ryan, Of Counsel – <i>DLAPiper LLP</i>; Adjunct faculty – <i>SJSU MST Program</i>  Jay Singer, Partner - <i>McDermott Will &amp; Emery LLP</i>  Neil J. Young – TEI Silicon Valley Chapter (moderator)</p>
3:00 – 3:15	Break	
3:15 – 4:15	<p><b>Domestic and Multistate Update</b>  Developments of relevance to high tech companies including depreciation and research credit changes, California update and key guidance and areas to watch at the state and multistate level including nexus, sourcing and apportionment.</p>	<p>Jeff Borghino, Partner – <i>Grant Thornton</i>  Dana Lance, Partner – <i>Grant Thornton</i></p>
4:15 – 5:30	<p><b>BREAKOUT E</b>  <b>What’s Hot and What’s New in M&amp;A</b>  A look at interesting transactions in the tech world and hot topics in the M&amp;A area, including impact of anti-inversion, earnings stripping, strategies for accessing offshore cash, BEPS-driven developments, and state tax changes.</p> <p><b>BREAKOUT F</b>  <b>BEPS and Relevance Beyond the Fortune 1000</b>  While the BEPS focus seems to be on the largest of companies, the implementation affects companies of all sizes involved in international activities. This panel will provide insights to dealing with these rules even if not a large, publicly-traded company.</p>	<p>Greg Hartker, Partner – <i>Morgan, Lewis &amp; Bockius LLP</i>  Brandon Hayes, Principal - <i>EY</i>  Andrew Kim, Partner - <i>Fenwick &amp; West LLP</i>  Eileen Marshall, Partner – <i>Wilson Sonsini</i></p> <p>Jon Davies, Partner – <i>Armanino LLP</i>  Michael W. Hardgrove, Partner – <i>DLA Piper, LLP</i></p>