



23rd Annual

**High Technology
Tax Institute**

NOVEMBER 5 & 6, 2007

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

Sponsored by

**Tax Executives Institute &
San Jose State University
College of Business**

23rd Annual High Technology Tax Institute

Monday November 5

Morning

7:30 - 8:15 Registration & Coffee

8:15 - 8:30 Introductions

Dave Gaul, *Cypress Semiconductor*, TEI Santa Clara Valley Chapter President
Annette Nellen, Tax Professor - *SJSU*

8:30 - 10:10 International High Technology U.S. Tax Current Developments

Jim Fuller, Partner - *Fenwick & West*

10:10 - 10:30 BREAK

10:30 - Noon Tax Accounting Under FAS 123R: Implementation & Insanity

Dean Kamahele, Tax Principal - *KPMG*
Ellie Kehmeier, Tax Director - *Deloitte Tax LLP*
Wendy Perez, Partner - *Ernst & Young*
Terry Spidell, Senior Manager - *PricewaterhouseCoopers*

Monday November 5

Afternoon

Noon - 1:45 Lunch & Speaker - Washington Update

Eric Solomon, Assistant Secretary for Tax Policy - *U.S. Department of the Treasury* (invited)

1:45 - 3:00 BREAKOUT A

Virtual Workers & Real Tax Issues

John McLearnie, International Executive Services Principal - *KPMG*
Allan Smith, Partner - *Grant Thornton*

BREAKOUT B

Convertible Debt Instruments: Old Rules With New Challenges & Questions

David L. Forst, Tax Practice Group Leader - *Fenwick & West*
Eileen C. Marshall, Partner - *Wilson Sonsini Goodrich & Rosati*

3:00 - 3:15 BREAK

3:15 - 5:15 FIN 48 Best Practices

John P. Basseer, Partner - *Ernst & Young*
Glen Kohl, Senior Vice President - Tax and Treasury - *Electronic Arts*
Jeff Sokol, Partner - *Deloitte Tax LLP*
Terry Spidell, Senior Manager - *PricewaterhouseCoopers*
Rusty Thomas, Partner - *KPMG*

5:15 - 7:30PM HOSTED SOCIAL HOUR

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7:30 - 8:00 Registration & Coffee

8:00 - 9:45 BREAKOUT SESSION C

Federal Tax Controversy

Larry R. Langdon, Partner - *Mayer Brown former Commissioner LMSB, IRS*
 Patricia Chaback, LMSB - Industry Director for Communications, Technology & Media - *IRS*
 Deborah Nolan, LMSB Commissioner - *IRS*
 Diane Ryan, Director of Technical Services, Appeals - *IRS*
 David B. Robison, Senior Advisor - Tax Resolution Strategies - *Skadden Arps former National Chief Appeals*

BREAKOUT SESSION D

Foreign Hot Topics

John Harrington, International Tax Counsel - *U.S. Department of the Treasury*
 Fred Johnson, Managing Director - *KPMG*
 Stewart R. Lipeles, Partner - *Baker & McKenzie LLP*
 Ron Saake, Tax Partner - *Deloitte*

9:45 - 10:10 BREAK

10:10 - 11:10 Getting Credit Where Credit is Due

Michael Goldbas, Principal - *Deloitte Tax LLP*
 Hoon Lee, Director - *BDO Seidman*

11:10 - 12:15 Section 409A - Are We There Yet?

Peter Campagna, Vice President - *Clark Consulting*
 Pete Klinger, Senior Director - *BDO Seidman*
 Buff Miller, Partner - *Cooley Godward Kronish LLP*

12:15 - 1:40 Lunch & Speaker - Budget Outlook – Into the Future

Mark Weinberger, Partner & Vice Chairman of Tax Services - *Ernst & Young*
 former Assistant Secretary for Tax Policy - U.S. Department of the Treasury
 Special recognition of Dr. Stewart Karlinsky

1:45 - 3:00 BREAKOUT SESSION E

International Corporate Philanthropy

Betsy Buchalter Adler, Principal - *Silk, Adler & Colvin*
 Janet Wong, Partner - *KPMG*
 Michael Yutzenka, Executive Director, *Cisco Systems Foundation*; Director, Public Benefit Investment - *Cisco*

BREAKOUT SESSION F

M&A - Planning for the Successful M&A

Robin Chesler, Partner - *Baker & McKenzie LLP*
 Peter Denwood, Partner - *Baker & McKenzie LLP*
 Michael Reichert, Global Managing Tax Partner - Technology Industry - *Deloitte Tax LLP*
 Michael F. Solomon, Partner - *Fenwick & West*

3:00 - 3:15 BREAK

3:15 - 3:45 Greening of The Tax Laws

Dan Kostenbauder, Vice President - Transaction Taxes - *Hewlett Packard Company*
 Annette Nellen, Tax Professor - *SJSU*

3:45 - 5:15 Federal & Multistate Tax Update

Annette Nellen, Tax Professor - *SJSU*
 Brian Pedersen, Managing Director - *Alvarez & Marsal Tax LLC*

23rd Annual High Technology Tax Institute

Tuition fee includes all sessions, materials, lunches and refreshment breaks.

TUITION FEES

Attendee

(before October 19th).....\$650
After\$675

TEI Member/Guest of TEI Member

(before October 19th)..... \$600
After \$650

CPE/MCLE CREDITS

The High Technology Tax Institute has been approved for Continuing Professional Education accreditation by the California State Board of Accountancy. The conference qualifies for 16 hours of CPE credit. San Jose State University's College of Business, certifies that an application is pending for approval of this activity for MCLE credit by the State Board of California.

HOTEL ACCOMMODATIONS

Crowne Plaza Cabaña Palo Alto
4290 El Camino Real, Palo Alto, California 94306
Hotel Room Rate: \$169/night, Reservations: (650) 857-0787

Contact the hotel by October 10, 2007 and identify yourself as a High Technology Tax Institute participant to qualify for the special rate.

REFUND POLICY

The Institute will refund registration fees contingent on receipt of a written request postmarked by October 19, 2007. A \$50 processing fee will be retained by the Institute. No refund requests postmarked after October 19th will be accepted. Please note that non-attendance of the institute will not qualify as a cancellation of registration. Written notification must be submitted by the date mentioned above.



ON-LINE REGISTRATION IS NOW AVAILABLE

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

OR COMPLETE FORM AND:

FAX Registration form to Lori Wilkin/SJSU (408) 924-3463
(forward your check after faxing your registration) and/or

MAIL Registration form/tuition fee to: High Technology Tax Institute - SJSU
Accounting & Finance Department, Attn: Lori Wilkin
One Washington Square, BT 850, San Jose, CA 95192-0066

Questions Call (408) 924-3460

Name _____

Title/Department _____

Company _____

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State _____ Zip _____

Day Phone _____

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How would you like your name to appear on your badge? _____

(Company names will be used for transferable badges)

My check is enclosed for the amount of \$ _____

Please circle breakout session preferences (select 3) Breakout A or B • Breakout C or D • Breakout E or F

Are you a TEI member or guest of a TEI member? YES NO

If a guest, name of sponsoring TEI member: _____

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One Washington Square, BT 850
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