



25th Annual
High Technology
Tax Institute

NOVEMBER 9 & 10, 2009

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

Sponsored by

Tax Executives Institute &
San José State University
College of Business

25th Annual High Technology Tax Institute

Monday November 9

Morning

7:30 - 8:15 **REGISTRATION & COFFEE**

8:15 - 8:30 **WELCOME**

Eli J. Dicker, Chief Tax Counsel – *Tax Executives Institute, Inc.*
Don Rath, Vice President – Corporate Tax - *Synopsys*, 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**

Sponsored by *Fenwick & West LLP*

10:30 - Noon **BREAKOUT A**

Impact of Economic Recession on Audits and Tax Compliance

Patricia Chaback, LMSB – Industry Director for Communications, Technology & Media – *Internal Revenue Service*
Eli J. Dicker, Chief Tax Counsel – *Tax Executives Institute, Inc.*
Larry R. Langdon, Partner – *Mayer Brown LLP*; former Commissioner LMSB, IRS

BREAKOUT B

Clean and Green – Opportunities for High Tech Companies

Greg Broome, Partner – *Wilson Sonsini*
John Gimigliano, Principal – *KPMG*
Alyssa Plicka, Partner – *PricewaterhouseCoopers*
Barry Slivinsky, Vice President-Tax – *Adobe*

Monday November 9

Afternoon

Noon - 1:30 **LUNCH & SPEAKER**

Clarissa C. Potter, Deputy Chief Counsel (Technical) – *Internal Revenue Service*

1:30 - 2:45 **Cost Sharing and Buy-in Payments – What's New**

David Bowen, Principal – *Grant Thornton*
John Peterson, Partner – *Baker & McKenzie*

2:45 - 3:00 **BREAK**

Sponsored by *Deloitte*

3:00 - 4:00 **What's New in Compensation Issues and Planning**

Ellie Kehmeier, Tax Director – *Deloitte*
Buff Miller, Partner – *Cooley Godward Kronish LLP*

4:00 - 5:15 **BREAKOUT C**

Avoiding Surprises in the Contract Manufacturing Regulations

Michael A. DiFronzo, IRS Deputy Associate Chief Counsel (International – Technical) – *Office of the Chief Counsel*
Channing P. Flynn, Partner – *Ernst & Young*
Diana L. Hickey, Partner – *Baker & McKenzie*

BREAKOUT D

Withholding – How to Do It Right and the Consequences of Mistakes

David S. Kolb, President – *Global Tax Network US, LLC*
Lori Nichols, Director, International Compliance, Strategy and Policy – *Internal Revenue Service*
Carol Rutlen, Principal – *Rutlen Associates*; Faculty – *SJSU*

5:15 - 7:30 **RECEPTION**

Sponsored by *Alvarez & Marsal Taxand*

25th Annual High Technology Tax Institute

Tuesday November 10

Morning

7:30 - 8:00 **REGISTRATION & COFFEE**

8:00 - 9:45 **FAS 109 in Down and Recovering Economies**

Dave Gaul, Tax Director – *Cypress Semiconductor*
Joseph Hogan, Tax Partner – *Ernst & Young LLP*
Rich Johnson, Tax Partner – *PricewaterhouseCoopers*
Jeff Sokol, Tax Partner – *Deloitte; Faculty – SJSU*
Rusty Thomas, Tax Sector Leader, Electronics and Software – *KPMG LLP*
David Yasukochi, Core Tax Services Partner – *BDO Seidman LLP*

9:45 - 10:00 **BREAK**

Sponsored by *Thomson Reuters*

10:00 - 11:50 **Recessionary Tax and Cash Planning Opportunities**

Ivan Humphreys, Partner – *Wilson Sonsini*
Michael Reichert, Global Managing Tax Partner – High Technology – *Deloitte*
Jerry Thompson, Vice President Tax - Corporate – *Ingram Micro*
Jim Carreon, Managing Director – *Alvarez & Marsal Taxand*
Kevin Anderson, Partner – *BDO Seidman LLP*

Noon - 1:00 **Presentation by IRS Commissioner**

Douglas Shulman, Commissioner – *Internal Revenue Service*

Tuesday November 10

Afternoon

1:00 - 1:40 **LUNCH**

1:45 - 3:00 **International Tax Reform**

Bill Barrett, CPA
Joe Calianno, Partner – *Grant Thornton*
David Forst, Partner – *Fenwick & West*

3:00 - 3:15 **BREAK**

Sponsored by *Ernst & Young*

3:15 - 4:00 **Consolidated Return Unified Loss Rules**

Danni Dunn, Partner – *Ernst & Young; Faculty – SJSU*
Pat Pellervo, Principal – *Washington National Tax Services – PricewaterhouseCoopers*

4:00 - 5:15 **Federal Domestic and State Tax Updates**

Annette Nellen, Professor – *San José State University*
Kim Reeder, Principal – *KPMG*

25th Annual High Technology Tax Institute

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

TUITION FEES	Attendee		TEI Member/Guest of TEI Member	
	(before October 23rd).....	\$700	(before October 23rd).....	\$650
	After	\$750	After	\$700

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 José 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 24, 2009 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 24, 2009. A \$50 processing fee will be retained by the Institute. No refund requests postmarked after October 24, 2009 will be accepted. Please note that non-attendance of the institute will not qualify as a cancellation of registration.



ON-LINE REGISTRATION IS NOW AVAILABLE

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

OR COMPLETE FORM AND:

FAX Registration form to Julie Ryan /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: Julie Ryan
One Washington Square, BT 850, San Jose, CA 95192-0066

Questions **Call Lori Wilkin or Julie Ryan (408) 924-3460**

Name _____ Title/Department _____
Company _____ Address _____
City _____ State _____ Zip _____
Day Phone _____ Email _____

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 2)

Breakout A or B • Breakout C or D

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

If a guest, name of sponsoring TEI member: _____

Tax Identification Number: 94-6017638

Please make your check payable to: SJSU High Technology Tax Institute



25th Annual High Technology Tax Institute
San José State University
College of Business
One Washington Square, BT 850
San Jose, CA 95192-0066

Non-Profit Org.
U.S. POSTAGE
PAID
San Jose, CA
Permit No. 816

Fax mailing list or address changes to (408) 924-3463.

Advisory Board

KIM BARR

Alvarez & Marsal Taxand LLP

BILL BARRETT

CPA

GREG BENZ

PG&E

TOM BONDI

Berger Lewis Accountancy Corporation

PATRICIA CHABACK

Internal Revenue Service

C. CABELL CHINNIS JR.

Mayer Brown LLP

ROCKY CUMMINGS

BDO Seidman LLP

JIM FULLER

Fenwick & West LLP

DAVID GAUL

Cypress Semiconductor

IVAN HUMPHREYS

Wilson Sonsini Goodrich & Rosati

TY KANAANEH

PricewaterhouseCoopers

ELLIE KEHMEIER

Deloitte Tax LLP

GLEN KOHL

Electronic Arts

LARRY LANGDON

Mayer Brown LLP

BUFF MILLER

Cooley Godward Kronish LLP

THOMAS MOSCHETTI

San José State University

GERALD MUGNOLO

Varian Inc.

ANNETTE NELLEN

San José State University

NANCI PALMINTERE

Intel Corporation

WENDY PEREZ

Ernst & Young LLP

JOHN PETERSON

Baker & McKenzie

MICHAEL REICHERT

Deloitte Tax LLP

UZI SASSON

IXYS Corporation

STEPHEN SEDLER

Seagate Technology

DOUGLAS SIROTTA

BDO Seidman LLP

ALLAN SMITH

Grant Thornton

RUSTY THOMAS

KPMG LLP

JANIS ZAIMA

San José State University