



# **26th Annual High Technology Tax Institute**

**November 8 & 9, 2010**

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

**Sponsored by**

**Tax Executives Institute, Inc.  
&  
San José State University  
College of Business**

# 26th Annual High Technology Tax Institute

Monday November 8

## Morning

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

Sponsored by *Fenwick & West*

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

Rick Eigenbrode, Managing Director, International Taxes – *Applied Materials*, 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** **BREAKOUT A**

**IRS Examination Practices and Strategies**

Michael J. Bernard, Tax Counsel - *Microsoft Corporation*  
Patricia Chaback, LMSB – Industry Director for Communications, Technology & Media – *Internal Revenue Service*  
Barbara Leonard, Area Counsel, Communications, Technology & Media – *Internal Revenue Service*  
Thomas Wilson, Senior Managing Director – IRS Services – *PricewaterhouseCoopers*

**BREAKOUT B**

**Successful Tax Practice in China and India**

Dharmesh Pandya, Senior Manager – *KPMG India Center of Excellence*  
Lili Zhang, Managing Director – US Tax Services, Hong Kong – *Deloitte*  
Jon Eichelberger, Partner – *Baker & McKenzie*

Monday November 8

## Afternoon

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

Eric Solomon, Director of National Tax - *Ernst & Young*; former Assistant Secretary for Tax Policy, U.S. Treasury Department

**1:45 - 3:15** **Getting Proper Research Credit**

Mark Andrus, Partner – Strategic Federal Tax Services – *Grant Thornton*  
Jeffery Jones, Partner - National R & D Practice, West Region Leader – *PricewaterhouseCoopers*  
Roger Kave, Associate Issue Counsel for R & -D Credit – *Internal Revenue Service*

**3:15 - 3:35** **BREAK**

Sponsored by *Deloitte*

**3:35 - 4:10** **International and Multistate Concepts – Similarities, Differences and Traps**

Bart Bassett, Tax Partner – *Morgan Lewis*  
Kim Reeder, Tax Partner – *Morgan Lewis*

**4:10 - 5:30** **Economic Substance**

Karen Gilbreath Sowell, National Tax Department – *Ernst & Young*, former Deputy Assistant Secretary for Tax Policy, U.S. Treasury Department  
Laurel Robinson, Deputy Area Counsel – *Internal Revenue Service*  
Eric Solomon, Director of National Tax – *Ernst & Young*; former Assistant Secretary for Tax Policy, U.S. Treasury Department

# 26th Annual High Technology Tax Institute

Tuesday November 9

## Morning

7:30 - 8:00 REGISTRATION & REFRESHMENTS

8:00 - 9:45 **Accounting for Income Taxes and Its Challenges**

Scott Jaconetty, Partner – *BDO Seidman*  
Glen Kohl, Senior Vice President - Tax and Treasury – *Electronic Arts*  
Tony Rebelo, Partner - *Ernst & Young*  
Gregory Rowley, Partner – Industry Tax Practice – *PricewaterhouseCoopers*  
Jeff Sokol, Partner – Deloitte; Faculty – *SJSU MST Program*  
Rusty Thomas, Partner – *KPMG*

9:45 - 10:00 BREAK

Sponsored by *Thomson Reuters*

10:00 - 11:45 **Uncertain Tax Positions – Tax Returns and Financial Statements**

Patricia Chaback, LMSB - Industry Director for Communications, Technology & Media – *Internal Revenue Service*  
Larry R. Langdon, Partner - *Mayer Brown LLP*; former Commissioner LMSB, IRS  
Heather Maloy, LMSB Commissioner - *Internal Revenue Service*  
Michael Reichert, Global Managing Tax Partner – High Technology – *Deloitte*  
Neil Traubenberg, Past International President - *Tax Executives Institute*

Tuesday November 9

## Afternoon

11:45 - 1:15 LUNCH & SPEAKER

Heather Maloy, LMSB Commissioner – *Internal Revenue Service*

1:45 - 3:00 BREAKOUT C

**Cross Border Issues**

David Bowen, Principal – *Grant Thornton*  
Steven A. Musher, Associate Chief Counsel (International) – *Internal Revenue Service*  
Ron Schrotenboer, Partner – *Fenwick & West*

BREAKOUT D

**Cloud Computing Primer**

Stephen Bates, Principal – *KPMG*    Brett Weaver, Partner - *KPMG*  
Rocky Cummings, Partner – National Leader Multistate Tax Services – *BDO Seidman*  
Paul Sallomi, U.S. Tax Industry Leader- Technology – *Deloitte*

3:00 - 3:30 BREAK

Sponsored by *Ernst & Young*

3:30 - 4:30 **M&A Hot Topics**

Danni Dunn, Partner – *Ernst & Young*; Faculty – *SJSU MST Program*  
Ivan Humphreys, Partner – *Wilson Sonsini Goodrich & Rosati*  
Kirt Switzer, Partner – *Latham*

4:30 - 5:30 **Federal Domestic and State Tax Updates**

Tony Fuller, Managing Director – *Alvarez & Marsal Taxand*  
Annette Nellen, Professor – San José State University; Director – *SJSU MST Program*

# 26th Annual High Technology Tax Institute

The tuition fee for the High Technology Tax Institute includes all sessions, materials, lunch and refreshment breaks.

## TUITION FEES

Attendee  
(before October 22nd).....\$700  
After .....\$750

TEI Member/Guest of TEI Member  
(before October 22nd)..... \$650  
After ..... \$700

Government employee  
(before October 22nd)..... \$400  
After ..... \$450

## 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. An application is pending for approval of MCLE credit by the State Board of California.

## HOTEL ACCOMMODATIONS

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

Contact the hotel by October 15, 2010 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 20, 2010. A \$50 processing fee will be retained by the Institute. No refund requests postmarked after October 20, 2010 will be accepted. Non-attendance at the institute does 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 Julie Ryan (408) 924-3460

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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 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: \_\_\_\_\_

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