



# 35th Annual TEI-SJSU High Tech Tax Institute

November 4 & 5, 2019

Crowne Plaza Cabana, 4290 El Camino Real, Palo Alto, CA 94306

**Registration Fee** (\$50 higher after October 21):

General \$750 TEI Member \$675

Government employee \$325

Includes materials, meals and parking, continuing education credit (CA CPA and MCLE)

http://www.sjsu.edu/taxinstitute/

## **Luncheon Keynote Speakers**

- The Honorable Charles P. Rettig, Commissioner IRS
- Ray Beeman, Principal Washington Council EY

### **Monday November 4**

### **International High Tech U.S. Tax Current Developments**

Jim Fuller, Partner - Fenwick & West LLP

### **Supply Chain Planning**

Sanjay Agarwal, Partner – MGO

Carlos Perez Gautrin, Senior Advisor, WCPA - IRS

Jian-Cheng Ku, Partner - DLA Piper (Netherlands)

Lance Martin, Partner - Baker & McKenzie, LLP

Steven Shee, Vice President Tax – Applied Materials

#### Transfer Pricing (Breakout A)

Margaret Critzer, Senior Advisor - Alvarez & Marsal Taxand, LLC Sharon Heck, Vice President of Finance & Global Tax – Intel Corp. John Hinman, Director, Field Operations, Treaties and Transfer Pricing Operations - IRS

Eli Hoory, Special Counsel (Int'I), Chief Counsel - IRS

Daniela Ielceanu, Partner – PwC

Matt Kramer, Managing Director - Grant Thornton

Vasudha Rangaprasad, Principal - Deloitte

### M&A Two Years After TCJA (Breakout B)

Melanie Krygier, Partner - Grant Thornton

Jill Harding, Vice President Corporate Tax – Synopsys, Inc.

Eileen Marshall, Partner - Cooley

Sarah Jane Morin, Partner - Morgan Lewis & Bockius LLP

Robert B. Williams, Jr., Senior Counsel, Office of Associate Chief Counsel (Int'l) Br. 4 - IRS

### FTC Planning (Breakout C)

Anne Devereaux, Deputy Associate Chief Counsel (Int'I),

Field Service & Litigation – IRS

Adam Halpern, Partner – Fenwick & West LLP

Rob Morris, Partner - Norton Rose Fulbright

Kristen Proschold, Director & Managing Tax Counsel, *Intuitive Surgical, Inc.* 

Will Skinner, Partner - Fenwick & West LLP; Adjunct

Professor - SJSU MST Program

### International Tax Basics to be Provision Compliant (D)

Ken Lee, Partner – PwC

Don Murray, Director, Field Operations West, CBA, LB&I – IRS

Ben Shreck, Tax Counsel – *Tax Executives Institute* Elena Virgadamo, Senior Advisor, Assistant Deputy Commissioner, International – *IRS* David Wachutka, Principal - *EY* 

### **Tuesday November 5**

### **Accounting for Income Taxes**

Charlotte Beaty, Managing Director – KPMG

Rachel Breen, Partner - EY

Jenny Chan, Partner – Deloitte

Jesus Ochoa, Partner - PwC

JJ Schneider, Partner - Grant Thornton

### Still Keeping to the BEAT (Breakout E)

David Forst, Partner - Fenwick & West LLP

Gabe Gartner, Principal – PwC

Peter Merkel, Branch Chief, Office of Associate Chief

Counsel (Int'l) Br. 5 - IRS

Taylor Reid, Partner – Baker & McKenzie, LLP

Elena Virgadamo - IRS

### Amended Returns – Let's Try Again (Breakout F)

Nora Beltran, Territory Manager, WCPA - IRS

Mary Duffy, Managing Director – Andersen Tax

Nate Giesselman, Partner – Skadden, Arps LLP

Barbara Schmidt, Principal – Seiler LLP

Eric Slack, Director, Field Operations-West - IRS

#### Non-U.S. International Tax News and Issues

Chad Hungerford, Partner – Deloitte

Paula R. Levy, Partner – Baker & McKenzie LLP

Eileen O'Pray, Of Counsel - Wilson Sonsini Goodrich & Rosati

### **IP Planning and Structure for Intangibles**

Greg Hartker, Partner - Morgan Lewis & Bockius LLP

Ken Harvey, Partner - Moss Adams LLP

Peter Rock, Territory Manager, Treaties and Transfer Pricing Operations - IRS

Matthew Sapowith, Director - MGO

Simon Webber, Managing Director - Duff & Phelps

### Federal Tax Controversy – Campaigns and Data Analytics

Wendy Abkin, Partner - Morgan Lewis & Bockius LLP

Cabell Chinnis, Partner – Mayer Brown LLP

Robert J. Kovacev, Partner – Norton Rose Fulbright US LLP

Emily Lam, Partner - Skadden, Arps LLP

Don Murray, Director, Field Operations West, CBA, LB&I - IRS

Eric Slack, Director, Field Operations-West - IRS

Gloria Sullivan, Director - Western Compliance Practice Area - IRS

### **Domestic and Multistate Update**

Annette Nellen, Professor – SJSU MST Program

Brian Pedersen, Managing Director - Alvarez & Marsal

Taxand, LLC; Adjunct Professor - SJSU MST Program