



Draft Agenda

Thursday February 19, 2015

8:00 – 8:30 Registration, Welcome by Sponsors and Continental Breakfast

- Dr. Stewart Karlinsky, Executive Director, Pacific Rim Tax Institute
 - Douglas O'Donnell, Acting Deputy Commissioner (International), LB&I, Internal Revenue Service
 - Don Blach, President, TEI Santa Clara Valley Chapter
 - Jeffrey K. Bergmann, Co-Chair, Silicon Valley Tax Directors Group
 - Elizabeth Magill, Dean, Stanford Law School
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8:30 – 10:00 Domestic and International Tax Developments

- Pascal Saint-Amans, Director, OECD Centre for Tax Policy and Administration
 - Pamela Olson, PWC Deputy Tax Leader WNTS (Former Treasury Assistant Secretary for Tax Policy)
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10:00 – 10:30 Coffee Break

10:30 – 11:45 BEPS I – Intellectual Property, Intangibles, Transfer Pricing, PE, Digital Economy Tax Issues, (Actions 1, 5, 7, 8-10)

- Gary Sprague, Partner, Baker & McKenzie – Moderator
 - John Ryan, Partner, Morgan, Lewis & Bockius
 - Brett Weaver, International Tax Partner, KPMG
 - Pascal Saint-Amans, Director, OECD Centre for Tax Policy and Administration
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11:45 – 1:15 Lunch and Keynote Speaker

- Doug O'Donnell, Acting Deputy Commissioner (International), LB&I, Internal Revenue Service
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1:15 – 3:15 Government Panel #1: China, Japan, Mexico

Government Tax Administrator from each of these countries and US/Foreign private sector representatives
Transfer Pricing; Competent Authority; Country and Regional Administrative Initiatives

- Chris Newman, Managing Director, Transfer Pricing, Duff & Phelps – Moderator
 - Peter Rock, Senior Manager, APMA Program, Internal Revenue Service
 - Wendy Guo, Tax Partner, PWC China
 - Oscar Molina, Deputy Commissioner for Large Business, Mexico
 - Masaaki Kaizuka, Deputy Commissioner, National Tax Administration, Japan
 - Timothy C. Seitz, Senior Vice President, Global Tax and Trade, Flextronics International
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3:15 – 3:30 Break

3:30 – 5:00 Advanced Pricing Agreements and Transfer Pricing Audits

- Craig Sharon, Principal, Ernst & Young – Moderator
 - Tracy Gomes, Partner, McDermott Will & Emery
 - Richard (Dick) McAlonan, Jr., Director of National Tax Transfer Pricing Controversy, Ernst & Young
 - Nate Carden, Partner, Skadden, Arps, Slate, Meagher & Flom
 - Peter Rock, Senior Manager, APMA Program, Internal Revenue Service
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5:00 – 6:00 Cocktail Party at Four Seasons Silicon Valley Hotel – Hosted by Bureau Van Dijk

8:00 – 9:00 Government Panel #2: Canada, Vietnam

Government Tax Administrator from each of these countries and US/Foreign private sector representatives
Transfer Pricing; Competent Authority; Country and Regional Administrative Initiatives

- Charles Triplett, Partner, Mayer Brown – Moderator
 - Richard Montroy, Assistant Commissioner-Compliance Programs Branch, Canada Revenue Agency
 - William S. (Bill) Maclagan, Managing Partner, Blake, Cassels & Graydon
 - Ronald D. Dickel, Vice President, Global Tax and Trade, Intel Corporation
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9:00 – 10:15 Government Panel #3 India

Government Tax Administrator from India and US/Foreign private sector representatives
Transfer Pricing; Competent Authority; Country and Regional Administrative Initiatives

- Mukesh Butani, Chairman, BMR Legal Advisors, India – Moderator
 - Akhilesh Ranjan, India Competent Authority
 - Bill Sample, Corporate Vice President Worldwide Tax, Microsoft Corporation
 - Alpana Saksena, Director, Global Transfer Pricing, KPMG
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10:15 – 10:45 Coffee Break

10:45 – 12:00 BEPS II – Base Erosion Treaty Abuse, Hybrid Utilization, CFC, Interest Payments, Accountability Monitoring (Actions 2, 3, 4, 6)

- John Peterson, Partner, Baker McKenzie – Moderator
 - Carol Doran Klein, Vice President and International Tax Counsel, USCIB
 - Carol Dunahoo, Partner, Baker & McKenzie
 - Pascal Saint-Amans, Director, OECD Centre for Tax Policy and Administration
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12:00 – 1:30 Lunch and Keynote Speaker

- Robert B. Stack, Deputy Assistant Secretary (International Tax Affairs) U.S. Department of the Treasury
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1:30 – 3:15 BEPS III – Administrative and Audit Focus — US and Foreign Perspectives, Including: IGAs, Joint Audits, Competent Authority, Transparency etc. (Action 11 - 15)

- Larry Langdon, Partner, Mayer Brown – Moderator
 - Masaaki Kaizuka, Deputy Commissioner, National Tax Administration, Japan
 - Samuel M. Maruca, Partner, Covington & Burling
 - Frank Ng, Executive Director, Ernst & Young
 - Doug O'Donnell, Acting Deputy Commissioner (International), LB&I, Internal Revenue Service
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3:15 – 3:30 Break

3:30 – 5:00 Emerging Companies in a Global Merging World (e.g. 367(d) and Inversions)

- Ivan Humphreys, Partner, Wilson Sonsini Goodrich & Rosati – Moderator
 - Luis Carrillo, Transfer Pricing Director, Bureau van Dijk
 - David L. Forst, Partner, Fenwick & West
 - Mark M. Hrenya, Partner, Cooley
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