

## TEI-SJSU High Tech Tax Institute (34<sup>th</sup> Annual)

November 5 & 6, 2018

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

### Registration Fee (\$50 higher after October 22):

General \$725      TEI Member \$650  
Government employee \$350

Includes materials, meals and parking,

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

### Luncheon Keynote Speakers

- Ray Beeman, Principal - *Washington Council Ernst & Young* – Washington DC Update
- Grace Perez-Navarro, Deputy Director - *OECD Centre for Tax Policy and Administration* – OECD Update

### Monday November 5

#### International High Tech US Tax Current Developments

Jim Fuller, Partner - *Fenwick & West LLP*

#### Decisions, Decisions – Capital Structures after the TCJA

Nate Giesselman, Partner – *Skadden, Arps LLP*  
Adam Halpern, Partner - *Fenwick & West LLP*  
Kirsten Malm, Principal – *EY*  
John G. Ryan, Partner - *Morgan, Lewis & Bockius LLP*

#### Say Goodbye? Exec Comp & Fringe Benefits Planning (Breakout A)

Anne G. Batter, Partner – *Baker & McKenzie LLP*  
Jennifer George, Partner - *PwC*  
Rick Berge, Executive Director - *EY*

#### Don't Get Beat by the BEAT (Breakout B)

Robert Bachmann, Director – *Duff & Phelps*  
Yaron Katz, Partner – *KPMG*  
Frank Mugabi, Partner – *DLA Piper*

#### Locating Intangibles – Generating and Using FDII (Breakout C)

Sanjay Agarwal, Partner – *MGO LLP*  
Lisa Felix, Director – *Armanino LLP*  
Ken Harvey, Partner – *Moss Adams*  
Allan Smith, Partner – *Grant Thornton LLP*

#### Tax Technology – The Future is Here – What It Means for You and Your Company (Breakout D)

Justin Femmer, Partner - *PwC*  
Channing Flynn, Partner – *EY*

### Tuesday November 6

#### Accounting for Income Taxes

Rachel Breen, Partner – *EY*  
Jesus Ochoa, Partner – *PwC*  
Thomas Sites, Managing Director – *KPMG*  
JJ Schneider, Partner – *Grant Thornton LLP*  
Matt Walton, Partner – *Deloitte*

#### Getting Credit – Generating and Using Foreign Tax Credits after the TCJA (Breakout E)

Dustin Coscarart, Sr. Manager – *Deloitte*  
Gabe Gartner, Partner - *PwC*  
James Guthrie, Principal – *CliftonLarsonAllen LLP*

#### Cryptocurrency, ICO and Whatever Else is New (F)

David Forst, Partner – *Fenwick & West LLP*  
Rob Massey, Partner - *Deloitte*  
Dawn Rhea, Director – *Moss Adams LLP*  
Brian Rowbotham, Partner - *Crowe Horwath LLP*

#### Transfer Pricing Transformations (Breakout G)

Nghi Huynh, Partner – *Armanino LLP*  
Darren Lo, Director – *Moss Adams LLP*  
Kevin McCracken, Partner - *PwC*  
Wade Owen, Director – *Duff & Phelps*

#### Keep Your Head in the Clouds (Breakout H)

Bart Bassett, Partner – *Morgan, Lewis & Bockius LLP*  
Taylor Reid, Partner – *Baker & McKenzie LLP*

#### M&A Meets the TCJA – Who Wins? (Breakout I)

Jill Harding, Partner – *Alvarez & Marsal Taxand*  
Melanie Krygier, Partner – *Grant Thornton LLP*  
Eileen Marshall, Partner – *Wilson Sonsini Goodrich & Rosati*

#### Digital Presence and the EU (Breakout J)

Alison Maxwell, Partner – *DLA Piper*  
Ben Shreck, Tax Counsel – *Tax Executives Institute*  
Gary Sprague, Partner – *Baker & McKenzie LLP*  
Mike Wittig, VP of Global Tax – *Netflix, Inc.*

#### Federal Tax Controversy – New Approaches

Nora Beltran, Dir. of Field Oper. – Southwest (Acting) - *IRS*  
C. Cabell Chinnis, Partner – *Mayer Brown LLP*  
Paul J. Curtis, Acting Director-Western - *IRS*  
Robert J Kovacev, Partner – *Norton Rose Fulbright US LLP*  
Heather Maloy, U.S. Tax Controversy Leader - *EY*  
Christopher P. Murphy, Counsel - *Skadden, Arps LLP*  
Jean Pawlow, Partner – *Latham & Watkins LLP*  
Eric Slack, WCPA Director of Field Operations–West – *IRS*  
Gloria Sullivan, Enterprise Activities Practice Area Dir. - *IRS*

#### Domestic and Multistate Update

Brian Rose, Partner – *Deloitte*  
John Paek, Partner – *Baker & McKenzie LLP*