

TEI-SJSU High Tech Tax Institute (33rd Annual)

November 13 & 14, 2017

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

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

Monday November 13

Time	Topic	Presenters
7:30 – 8:20	Registration & refreshments	
8:20 – 8:30	Welcome	Ricardo G. Samaniego, Head of Tax, Samsung; President – <i>TEI Santa Clara Valley Chapter</i> Annette Nellen, MST Program Director – <i>SJSU</i> Dan Moshavi, Dean – <i>SJSU College of Business</i>
8:30 – 10:00	International High Technology U.S. Tax Current Developments Comprehensive review of developments relevant to high tech companies.	Jim Fuller, Partner - <i>Fenwick & West LLP</i>
10:00 – 10:20	Break	
10:20 - noon	Supply Chain Planning Location and distribution decisions as affected by such tax considerations as BEPS, Brexit, US tax reform and state and local tax rules. Considerations for both US and foreign-headquartered companies.	Bart Bassett, Partner - <i>Morgan, Lewis & Bockius LLP</i> Long Hua, Partner - <i>EY</i> Jimmy Man, Partner - <i>Deloitte</i> Brian Pedersen, Partner – <i>Alvarez & Marsal Taxand LLC</i> Taylor Reid, Partner – <i>Baker & McKenzie</i>
Noon – 12:40	Lunch	
12:40 – 1:30	Luncheon speaker	Steven K. Rainey, CIO and National Leader for Data & Analytics, Tax – <i>KPMG</i>
1:35 – 3:15	BREAKOUT A Indirect Taxes in the Digital Economy Strategies to deal with both VAT and sales tax for cloud computing and other digital transactions. BREAKOUT B Protecting Your Exit Strategies	Randy Ferris, Exec. Director – <i>EY</i> David Gaul, VP Taxation – <i>GoPro, Inc.</i> Hugh Goodwin, Partner - <i>DLA Piper</i> Birgit Juergensmann, Partner - <i>Mazars LLP</i>

	Planning and due diligence considerations for optimizing tax results and minimizing risks. Topics covered include earnouts, insurance, provisions, reserves, state taxes and loss and credit carryforward limitation rules.	Jill Franciosi, Partner - <i>EY</i> Jill Harding, Partner – <i>Alvarez & Marsal Taxand LLC</i> Melanie Krygier, Senior Manager – <i>Grant Thornton</i> Eileen Marshall, Partner – <i>Wilson Sonsini Goodrich & Rosati, PC</i>
3:15 – 3:30	Break	
3:30 – 5:15	Federal Tax Controversies – Technical Issues and Strategies Living with the new LB&I campaign structure, relevance of “soft” letters, key issues for tech companies, strategies for the new appeals process, Pub 5125 procedures, and more.	Pat Chaback, Executive Director - <i>EY</i> Kimberly Edwards, Director, Western Compliance – <i>IRS</i> Eric Johnson, Tax Director – <i>Ross Stores</i> ; TEI Silicon Valley Chapter past chair Larry Langdon, Partner – <i>Mayer Brown LLP</i> Andy Mattson, Partner – <i>Moss Adams</i> Jean Pawlow, Partner – <i>McDermott</i> Eric Slack, Director of Field Operations – West, Western Compliance Practice Area LB&I - <i>IRS</i> Gloria Sullivan, Director, Financial Institutions and Products - <i>IRS</i>

Tuesday November 14

Time Slot	Topic	Presenters
7:30 – 8:15	Registration & coffee	
8:15 – 9:15	Accounting for Income Taxes Dealing with current issues and being prepared for federal reforms from consumption taxes, border adjustments, and corporate integration.	Perry Leslie, Partner - <i>KPMG</i> Jesus Ochoa, Partner – <i>PwC</i> JJ Schneider, Partner – <i>Grant Thornton</i> Tyler Spalding, Partner - <i>Deloitte</i>
9:15 – 10:30	BREAKOUT AA IP Location Planning What should be the current thinking in light of BEPS, DEMPE functions, country-by-country reporting, Brexit, transfer pricing litigation, US tax reform and new taxes and audit strategies in other countries? Considerations for both US and foreign-headquartered companies. BREAKOUT BB The New Research Credit LB&I Directive	Gabe Gartner, Principal – <i>PwC</i> Pie Geelen, Head of European Desk, New York – <i>DLA Piper</i> Adam Halpern, Partner – <i>Fenwick & West, LLP</i> Nate Carden, Partner – <i>Skadden, Arps, Slate, Meagher & Flom LLP</i> Jon Davies, Partner – <i>Armanino</i>

	Key players in the issuance of the Directive on the research credit for taxpayers with ASC 730 financial statements will explain the process.	Nora Beltran, Team Manager - <i>IRS</i> Kimberly Edwards, Director, Western Compliance – <i>IRS</i> Janine Jones, SME, General Business Credit Practice Network - <i>IRS</i> Jeffrey P. Jones, Partner - <i>PwC</i> Barry Slivinsky, VP Tax - <i>Adobe</i> Paul Zamolo, Deputy Area Counsel, <i>LB&I - IRS</i>
10:30 – 10:45	Break	
10:45 - noon	<p>BREAKOUT C Brexit Tax Implications How the UK’s exit from the EU affects VAT rules and compliance, impact to tax treaty positions, and dealing with UK taxes both new (such as the Diverted Profits Tax) and old.</p> <p>BREAKOUT D Tax Automation: AI, Robots, Blockchain and More How will existing technology evolve and what is the effect on design or redesign of the optimal corporate tax department. What should you be doing now to prepare?</p>	<p>Eric Ryan, Of Counsel – <i>DLA Piper</i>; Adjunct faculty – <i>SJSU MST Program</i> Paul Rutherford, Partner – <i>DLA Piper</i> (London) David Sayers, Partner – <i>Mazars LLP</i> (London)</p> <p>Rafiq Jalal, Director, Tax Data & Analytics – <i>KPMG</i> Andy Ruggles, Principal; Head of Tax Reporting & Strategy Group – <i>PwC</i> John Viglione, Executive VO – <i>Vertex, Inc.</i> James Wolfrom, Partner - <i>EY</i></p>
12 – 12:40	Lunch	
12:40 - 1:25	Luncheon Speaker	Rohit Kumar, Tax Policy Services Leader and Principal – <i>PwC</i>
1:30 – 2:45	<p>BREAKOUT E BEPS 2.0 Status update including unilateral actions by some countries, treaty issues, transfer pricing, CbC, and relevance of US tax reform.</p> <p>BREAKOUT F Regulations – Relevance of Replace 2 to Issue 1, GAO and Congressional Concerns A review of the process and rules for federal tax regulations, concerns raised by the GAO in 2016, Congressional concerns with the process and <i>Chevron</i> deference, and the current administration. What to expect going forward.</p>	<p>Lance Martin, Partner – <i>Baker & McKenzie</i> Mark R. Martin, Principal – Transfer Pricing - <i>KPMG</i> Peter Rock, Program Manager, Advance Pricing and Mutual Agreement Program – <i>IRS</i> Ben Shreck, Tax Counsel – <i>Tax Executives Institute</i></p> <p>Robert J Kovacev, Partner – <i>Steptoe & Johnson LLP</i> Annette Nellen, MST Program Director – <i>SJSU</i></p>
2:45 – 3:00	Break	
3:00 – 4:30	<p>U.S. Tax Reform What’s on the table, or perhaps, what has been enacted?</p>	David Forst, Partner – <i>Fenwick and West, LLP</i>

	Explanation of key changes of greatest impact to tech companies, how the changes affect transfer pricing, decisions on intangibles and workforce location, state tax implications, and more.	Nate Giesselman, Partner – <i>Skadden, Arps, Slate, Meagher & Flom LLP</i> Sajeev Sidher, Managing Director - <i>Deloitte</i>
4:30 – 5:30	Domestic and Multistate Update Developments of relevance to high tech companies including depreciation and research credit changes, California update and key guidance and areas to watch at the state and multistate level including nexus, sourcing and apportionment.	Josh Brady, Partner - <i>Morgan, Lewis & Bockius LLP</i> Dana Lance, Partner – <i>Grant Thornton</i>