

Registration 14th Annual International Tax Conference

Monday, March 23, 2015
8:00 am – 4:00 pm

REGISTER ONLINE by March 20, 2015:
<https://www.regonline.com/AkronTax2015>

-OR-

Please type or print

Name(s) _____

Email address(es) _____

Name of organization _____

Address _____

City/Zip _____

Number attending at \$125 _____

Total amount enclosed _____

Continental Breakfast & Lunch Buffet
Included in Registration

Please include a check payable to The University of Akron and mail with the registration form above to:

Ms. Jacklyn Dean
George W. Daverio School of Accountancy
The University of Akron
Akron, Ohio 44325-4802
jam219@uakron.edu
330 972 7588

Please return registration and payment no later than March 16, 2015.

Occupation: CPA _____ Faculty _____
Attorney _____ Student _____
PA _____ Other _____

Purpose of Conference

The 14th Annual International Tax Conference, sponsored by the George W. Daverio School of Accountancy and the Institute for Global Business at The University of Akron, is designed to update practitioners in the accounting, legal, business and governmental sectors. Prominent tax specialists will discuss new developments, tax savings ideas, current issues and changes in the laws applying to international business taxation.

CPE and CLE Credits

The International Tax Conference qualifies for 7.0 Continuing Professional Education (CPE) credits and for 6.0 Continuing Legal Education (CLE) credits (applied for) for Ohio attorneys. Attorneys will need to complete a form provided at the conference (please include your Ohio ID#) at the conclusion of the event to request reporting of CLE credits. CPAs will have a form to be completed as well, and can exchange it for a Certificate of Attendance at the event.

Registration Fee

The conference is presented as a public service to the tax community. The registration fee is \$125 and includes course materials, continental breakfast, lunch and refreshments.

To register please complete the registration form in this brochure, include a check or money order made payable to The University of Akron, and mail to Ms. Jacklyn Dean, School of Accountancy, The University of Akron, Akron, Ohio 44325-4802 by March 16, 2015 or see the online registration information below.

Convenient Online Registration

You may also register online by March 20, 2015 at <https://www.regonline.com/AkronTax2015>.

Masters of Taxation Program at The University of Akron

Earn your Master of Taxation (MTax) degree in as little as 15 months through The University of Akron's MTax Direct. This practice-oriented program emphasizes international tax. Students earn the degree through an online/real time approach featuring live, interactive lectures plus the opportunity to conveniently view recorded sessions. With no classes held during the busy tax season, the program is designed for working professionals regardless of location. No GMAT is required for CPAs. Learn more about the program at <http://MTaxDirect.uakron.edu> or call 330 972 7588.

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The University of Akron
George W. Daverio School of Accountancy
Akron, OH 44325-4802



Announcing:
14th Annual International Tax Conference
Monday, March 23, 2015 - 8:00 am-4:00 pm
Return by March 16, 2015

The University of Akron is an Equal Opportunity Employer

14th Annual International Tax Conference

Monday, March 23, 2015

8:00 am – 4:00 pm
CPE Credit: 7.0 Hours
CLE Credit: 6.0 Hours

Registration Fee: \$125
Includes Breakfast & Lunch

Location

Doubletree Hotel Cleveland South
6200 Quarry Lane
Independence, Ohio 44131
(Rockside Road East at Interstate 77)
216 447 1300 phone

Jointly Sponsored by
George W. Daverio School of Accountancy
and The Institute for Global Business at
The University of Akron
330 972 7588 phone
330 972 8597 fax

*An outreach event of the Masters of Tax Program
at The University of Akron, the premier
Masters of Tax Program of Ohio*

Register for the conference online at
<https://www.regonline.com/AkronTax2015>

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14th Annual International Tax Conference

Monday, March 23, 2015

Program

8:00 am – 8:20 am
Registration and Continental Breakfast

8:20 am – 8:30 am
Welcome – from The University of Akron
Alvin H. Lieberman, Coordinator of Taxation Studies
Dr. Thomas Calderon, Chair, School of Accountancy
Dr. Ravi Kroví, Dean, College of Business Administration

8:30 am – 9:30 am
BEPS and State Aid – Update and Key Takeaways
Michael Urse, J.D., CPA / Matthew Wallace, CPA

9:30 am – 10:30 am
Foreign Tax Law Update – France, China, UK, Others
Guillaume Glon, Attorney / Brandon Roytberg, J.D., CPA

10:30 am – 10:45 am
Break

10:45 am – 11:30 am
Foreign Currency Hot Topics – Section 987 & Planning Topics
Erik Rosenfeld, CPA / Michael Mou, J.D., LL.M.

11:30 am – 12:30 pm
M&A Tax Update
Matthew Chen, CPA / Bradley Thompson, CPA

12:30 pm – 2:00 pm
Buffet Lunch (included in registration)
Update on Global Controversy and Tax Administration Matters
Michael Danilack, J.D.

2:00 pm – 2:45 pm
International Tax Compliance & Reporting Update
Kathy MacDonald, CPA

2:45 pm – 3:30 pm
Tax Accounting Hot Topics
Dean Pontius, CPA / Alan Higgins, CPA

3:30 pm – 4:00 pm
Closing Remarks / Questions

14th Annual International Tax Conference Planning Committee

Rolla Abbass	Alan Higgins	Erik Rosenfeld
Thomas Calderon	Alvin H. Lieberman	Michael Urse
Il-Woon Kim		Matthew Wallace



Matthew Chen
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Matt is a partner in the Washington National Tax Services office of PwC. He practices international tax planning primarily for U.S.-headquartered multinational companies, with emphasis on Subpart F, foreign tax credits, electronic commerce and software transaction issues, and international tax aspects of acquisitions, joint ventures, intangibles, and other business transactions.

Matt has authored or co-authored articles on recent developments in subpart F involving the contract manufacturing regulations, cross-border stock acquisitions, the substantial assistance rule under Notice 2007-13, and check-the-box planning strategies.

He is a certified public accountant licensed in Illinois and Washington, DC, and is a member of AICPA. Matt is a graduate of University of Illinois, Urbana-Champaign.



Mike Danilack
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Mike Danilack is a Partner in PwC's Washington National Tax Services practice and plays a key role in PwC's Global Tax Controversy and Dispute Resolution network. Mike's work focuses on international tax dispute resolution through the mutual agreement procedures and APAs, on IRS controversies involving international tax and transfer pricing issues, and on general cross-border tax planning.

Before joining PwC in December 2014, Mike served as the Deputy Commissioner (International) in the IRS Large Business and International Division where he was responsible for all international tax matters for the IRS, including serving as the U.S. Competent Authority. He has nearly 30 years of experience in dealing with international and corporate tax matters and is a frequent public speaker and author on critical international tax issues.



Guillaume Glon
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Based in New York, Guillaume is a partner with Landwell & Associés, PwC's correspondent law firm in France. He joined PwC in 1998 and has more than 16 years of experience primarily focused on international tax structuring, M&A projects, cross-border structuring and financing transactions. Guillaume has extensive experience advising French multinationals on the design and implementation of their investment strategies outside of France. He also works for US and Canadian corporate clients investing in France.

His clients have mainly been concentrated in the technology, consumer products and industrial products sectors.

Guillaume is a lawyer registered with the Hauts-de-Seine bar. He graduated cum laude from the University of Montpellier, and holds a specialized studies diploma in business law and taxation and a postgraduate diploma in corporate law. He is the author of a number of articles on international tax.



Alan W. Higgins
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As EY's International Tax Services Group Market Leader for Northeast Ohio, Alan serves a number of US and foreign-based companies. He has over 33 years experience in taxation, the last 26 focused on international taxation matters affecting multinational enterprises. He has extensive experience in US and foreign country transfer pricing matters, value chain planning, cross-border reorganizations and financing transactions, repatriation and foreign tax credit planning.


Alan has served clients in a variety of industries, principally manufacturing food and beverage, pharmaceutical and medical devices, and natural resources. Alan has been a frequent speaker at seminars sponsored by the Tax Executives Institute, the World Trade Institute, and ATLAS/CITE, as well as an instructor in International Taxation classes for DePaul and the University of Cincinnati. He has published or co-authored several articles on topics including source and character of income, passive foreign investment companies, transfer pricing, and financing and structuring cross-border investments. Alan became a CPA in 1983 in Alabama and is also certified in Ohio. He is a member of several professional organizations, including the American Institute of CPAs.



Kathy MacDonald
Executive Director
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Kathy is an Executive Director in the Chicago office of Ernst & Young LLP and a member of EY's International Tax service line. Kathy has 16 years of public accounting experience providing international tax services for publicly-owned multinational companies. She worked at EY from 1998 to 2006 and recently rejoined the Chicago practice. Kathy has extensive experience in the area of international compliance.

Kathy's recent projects have included a combination of US international tax compliance, research and planning engagements. One of these projects involved the analysis of corporate structures and transactions to determine US filing requirements for a client that files over 100 returns for operations in 50 countries. On this project, Kathy drove the process for collecting and analyzing local country data to support the US international compliance and tax provision processes. On another project, Kathy successfully teamed with other service lines to develop tools that streamlined and automated various manual processes. Kathy has helped clients with the implementation of OneSource Income Tax and has managed all international aspects of compliance engagements.



Michael Mou
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Michael is a Partner in the International Tax Services group in the Washington National Tax Office. Michael's practice principally involves taxation of financial instruments, foreign currency, and cross-border treasury operations. He advises U.S. multinationals, investment banks, banks, hedge funds, and other financial institutions on tax issues related to capital market products, derivatives, foreign currency transactions, and treasury operations (including cash pooling and in-house bank structures).

Michael received his J.D., cum laude, from Loyola Law School, Los Angeles, in 2004, where he was named to the Order of the Coif and served as an Editor of Loyola Law Review. He received his L.L.M. in Taxation from New York University School of Law in 2005 where he also served as Graduate Editor of New York University Journal of International Law and Politics.



Dean Pontius
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Dean has been a Partner since 2006 in the International Tax Services group of PwC. Although his experience covers a broad range of international tax issues, Dean specializes in assisting US-based multinationals with US and foreign tax restructuring, IRS reporting issues regarding foreign investment, issues involving US foreign tax credits, and tax accounting for non-US investments. Dean joined PwC in 1993 in Cleveland, Ohio and also spent 1-12 years in the Firm's Washington National Tax Practice. In his current role with PwC, Dean serves as the lead ITS partner for a diverse client base of primarily US-based public multinational corporations, primarily in the Pittsburgh, PA market since 2010.

In addition to his client responsibilities, Dean is a frequent instructor of international tax classes for PwC's training programs, various professional seminars, and serves on the International Tax Services Outbound Solutions National Team for PwC. Dean is a graduate of Manchester College (Indiana), where he received both his Bachelor of Science and Master of Arts in Accounting. He is a licensed CPA in the States of Ohio and Pennsylvania.



Erik A. Rosenfeld
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Erik leads the International Tax Services in the Cleveland office of PwC. Erik's experience spans three decades and all key markets for industrial manufacturing companies (AsiaPac, Europe, North America and LatAm). Erik provides strategic vision to his clients to manage complex situations in an understandable way. As a Director, Erik spent two years working alongside the firm's top international tax experts to assist a variety of client as part of PwC's Washington National Tax Services practice. Both in Washington and beyond, Erik has built strong relationships. He utilizes his large global network of PwC's top technicians to bring deep expertise to his clients in a manner that is timely and tailored to their needs.

A Cleveland native, Erik works to enhance the northeast Ohio business environment by teaching as an adjunct professor in the University of Akron's Masters of Taxation program as well as serving as an advisory board member benefitting the University's Accounting and Institute for Global Business programs. Erik received his B.S. in Accounting and Finance, *summa cum laude*, from Miami University in 1997. Erik is a licensed CPA with both the District of Columbia and Ohio Boards of Accountancy.



Brandon Roytberg
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Brandon is a Director in PwC's International Tax Services in the Cleveland office. He has over 8 years of experience working with outbound and inbound multinationals in leveraging and enhancing their global competitiveness through cost-effective tax planning and execution. His diverse client base experience covers, among others, industrial manufacturers, software developers, retailers, and financial service providers. His work has included a major PwC New York Metro office assignment involving tax-efficient acquisition and integration into a world-class outbound holding company structure of subsidiaries in over 50 offshore jurisdictions. His passion is in delivering full-service international tax compliance and consulting solutions to his clients.

Brandon brings extensive and broad international tax knowledge grounded in accounting and law. He is a licensed CPA and a member of the Bar in the State of Ohio. He has a B.S. in Accountancy, *cum laude*, from Case Western Reserve University and a J.D., *cum laude*, with a concentration in Business, from Cleveland-Marshall College of Law, where he served as an editor of the Cleveland State Law Review.



Bradley Thompson
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Brad Thompson is a director in the PwC Mergers and Acquisitions group based in Cleveland, Ohio, specializing in tax due diligence and the tax aspects of mergers, acquisitions, and restructurings and other major domestic and international corporate transactions. Brad's practice has concentrated on the application and interpretation of U.S. federal income tax law as it relates to domestic and cross border corporate acquisitions, consolidated groups, tax efficient structuring and use of debt, as well as the reorganization provisions of the Internal Revenue Code. He has worked on numerous major cross-border transactions and has provided merger integration and consulting services in a wide variety of industries, including aerospace and defense, healthcare, financial, infrastructure, and retail.

Brad earned a B.S. in Accounting and a M.S. in Accounting (emphasis in Taxation) from the University of South Carolina. He is a CPA in Georgia and Ohio and is a member of the AICPA.



Michael F. Urse
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Mike is a Partner at PwC and the co-leader of PwC's US International Tax Practice. Mike is a member of PwC's national Integrated Global Structuring Group, which designs and implements foreign holding and financing structures that help minimize foreign taxes and improve cash redeployment and repatriation. He has also worked extensively on tax efficient foreign acquisition structuring and integration. Mike has extensive experience in the development of strategies to increase foreign source income, and to minimize foreign source expenses (stewardship and SG&A studies, interest and R&D expense apportionment, etc.).

Mike has 30 years of international tax experience serving numerous US and foreign-based multinationals. From July 1990 to September 1991, Mike was on special assignment in the Firm's New York office managing the US international tax desk. Mike has made frequent speeches and webcasts and is an author on a variety of international tax subjects. He is also Adjunct Professor of the Masters level International Tax course at The University of Akron. Mike received his B.A. in Accounting, *summa cum laude*, in 1981 from the Ohio State University, and graduated from the Ohio State University Law School in 1984. He is a CPA licensed to practice in Ohio.



Matthew D. Wallace
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Matt is a Partner in the Cleveland office of PwC's International Tax Services. Prior to joining the Cleveland practice, Matt completed a rotation through PwC's National Tax office in Washington, DC, where he worked with some of PwC's leading technical experts and thought leaders.

His experience ranges from value chain transformation and Asia (primarily and procurement company) planning, tax optimization for both outbound and inbound companies, subpart F planning, foreign tax credit planning, and cross-border M&A, to inventory capitalization and federal tax compliance. Matt has extensive industry experience with industrial products companies, and is also part of PwC's National Retail Specialist team. Matt is a frequent speaker at regional and national conferences. He holds a B.S. from The Ohio State University and an MST from American University.