Registration
17th Annual International Tax Conference

Wednesday, March 14, 2018
8:00 am – 4:00 pm

REGISTER ONLINE by March 9, 2018:
https://www.regonline.com/AkronTax2018

-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. Nancy Stott
The George W. Daverio School of Accountancy
The University of Akron
Akron, Ohio 44325-4802
nsstott@uakron.edu
330 972 7588

Please return registration and payment no later than March 9, 2018.

Occupation: CPA____________ Faculty _____________
Attorney_________ Student _____________
PA _____________ Other________________

Purpose of Conference

The 17th 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 international tax specialists with national reputations 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 for Ohio CPAs and for 6.0 Continuing Legal Education (CLE) credits 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. Ohio 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. Nancy Stott, School of Accountancy, The University of Akron, Akron, Ohio 44325-4802 by March 9, 2018 or see the online registration information below.

Convenient Online Registration

You may also register online by March 9, 2018 at https://www.regonline.com/AkronTax2018.

Masters of Taxation Program at The University of Akron

Earn your Master of Taxation (MTax) degree in as little as 15 months of classes through The University of Akron's MTax Direct. This practice-oriented program emphasizes international tax. Students earn the degree by taking live, interactive classes *online* 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
The George W. Daverio School of Accountancy
Akron, OH 44325-4802

Announcing:
17th Annual International Tax Conference
Wednesday, March 14, 2018 - 8:00 am-4:00 pm
Return by March 9, 2018

The University of Akron is an Equal Opportunity Employer

17th Annual International Tax Conference

Wednesday, March 14, 2018
8:00 am – 4:00 pm
CPE Credit: 7.0 Hours
CLE Credit: 6.0 Hours

Registration Fee: $125
Includes Breakfast & Lunch

Location
Embassy Suites Cleveland - Rockside
5800 Rockside Woods Boulevard N
Independence, Ohio 44131
(off the intersection of I-480 and I-77)
Phone: 216 986 9900

Jointly Sponsored by
The 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/AkronTax2018

17th Annual International Tax Conference
Wednesday, March 14, 2018

Program

7:40 am – 8:20 am
Registration and Continental Breakfast

8:20 am – 8:30 am
Welcome from The University of Akron – Dr. Thomas Calderon

8:30 am – 10:00 am
U.S. Tax Reform and Impact on Planning
Michael Urse, J.D., CPA / Matthew Wallace, CPA

10:00 am – 11:00 am
Deep Dive on U.S. International Tax Reform - Session I
Dan McMann, CPA / Joshua Ruland, J.D.

11:00 am – 11:15 am
Break

11:15 am – 12:15 pm
Deep Dive on U.S. International Tax Reform - Session II
Brian Abbey, J.D., LL.M. / Matthew Wallace, CPA

12:15 pm – 1:00 pm
Buffet lunch

1:00 pm – 1:45 pm
Transfer Pricing Update
Raoul Gonzalez / Rupesh Santoshi, CPA

1:45 pm – 2:45 pm
Foreign Tax Law Update
Liam Diamond / Brian Demeter, J.D., CPA

2:45 pm – 3:30 pm
Accounting for International Tax Issues in Reform
Greg Rosko, J.D., CPA / John Domenick, CPA

3:30 pm – 3:45 pm
Closing Remarks / Questions

17th Annual International Tax Conference Planning Committee

Thomas Calderon	*Michael Urse*	*Matthew Wallace*
Doron Narotzki	*Brian Abbey*	*James Cochran*
Il-Woon Kim	*Daniel McMann*	*Emily Arjani*

Brian Abbey
Executive Director, International Tax Practice
Ernst & Young, Pittsburgh
412 644 0423; brian.abbey@ey.com

Brian Abbey is an Executive Director in Ernst & Young LLP's international tax practice based in Pittsburgh. He recently rejoined EY's practice after spending time as the International Tax Director at a publicly traded diversified dental products manufacturer and distributor. As the International Tax Director, Brian had responsibility for the Company's global income tax and transfer pricing strategies, as well as the foreign components of the Federal income tax return, income tax provision and tax controversy matters. While at EY, Brian worked in both the Pittsburgh and Philadelphia offices and spent time in National Tax as part of the Global Tax Analysis Group. He also spent time in the national tax practice of another Big Four accounting firm before joining EY in 2005.

Brian is experienced in U.S. international taxation, practicing foreign tax credit planning and attribute management, foreign tax minimization, cross-border reorganizations, mergers and acquisitions, holding company structures and joint venture planning.

He received a B.S. in economics from The Pennsylvania State University, and his J.D. cum laude, from The Pennsylvania State University-Dickinson School of Law. He also received a LL.M. in taxation from the University of Florida.

Brian Demeter
Director, International Tax Services
PricewaterhouseCoopers, Cleveland
216 875 3475; brian.s.demeter@pwc.com

Brian is a Director with PwC's International Tax Services practice. Brian has experience in inbound and outbound US tax compliance and consulting. Brian's primary client base includes US based multi-national companies in the industrial products and retail sectors. Brian assists clients with acquisition structuring, post acquisition integration, local country tax minimization, cash redeployment strategies, foreign tax credit optimization, subpart F identification and remediation, and tax attribute management.

Brian holds a J.D. in Law from Cleveland State University – Cleveland-Marshall College of Law as well as a B.A. in Accounting from Ohio Wesleyan University. He is a CPA licensed to practice in Ohio.

Liam Diamond
Partner, International Tax & FDI
PricewaterhouseCoopers, Dublin, Ireland
353 1 792 6579; liam.f.diamond@ie.pwc.com

Liam Diamond is a Tax Partner in PwC Ireland specializing in inward investment projects and international tax planning, primarily for international Technology, Services, Life Sciences and Retail & Consumer groups, focusing particularly on IP planning and global structure alignment.

Liam joined PwC in August 1997 and has extensive experience in advising US, Canadian, UK and other international groups on a wide range of tax matters. He has also written and spoken widely on Irish and international tax matters. For over 2 years to October 2006, Liam worked in PwC's International Tax Services (ITS) group in New York. During this time, he re-established the Irish Tax Desk and advised many international groups on Irish M&A transactions and international tax planning using Ireland.

Liam returned to PwC Dublin in October 2006 and re-joined PwC Ireland's ITS / Inward Investment practice. He travels abroad regularly and oversees the work of the Irish Tax Desk team based in the US. He is a member of the Tax Policy Group of the American Chamber of Commerce Ireland, as well as the Ireland Canada Business Association and the Ireland India Business Alliance.

Significant projects on which Liam has advised include: IP planning and migration; global structure alignment; establishing Irish entrepreneur/principal companies; R&D tax credit maximization; holding company and tax-efficient financing structures; leasing, treasury and captive insurance companies; SPVs and onshore investment platforms.

John E. Domenick
Partner, Tax
Ernst & Young, Cleveland
412 779 7602; john.domenick@ey.com

John has over 18 years of experience providing professional services to both public, private and emerging growth global organizations.

John is a tax account leader in the global compliance and reporting group based out of the Cleveland Ohio office; John also leads the global compliance and reporting group for Northeast Ohio, Charleston and Pittsburgh. He is the main point of contact for global and domestic clients in assisting with a variety of tax planning opportunities to minimization of the overall effective income tax rate and tax risk. John serves as the lead tax individual for certain companies who outsource or co-source the tax function and is the lead tax partner on many global and domestic compliance and reporting engagements.

A graduate from Clarion University with a B.S. in Accounting and Robert Morris University with a M.S. in taxation. John is a Certified Public Accountant. John has served a variety of clients in many different industries such as private equity – manufacturing/distribution – retail – technology – software – SAAS – biotech – life sciences – services – government contractors.

Raoul Gonzalez
Principal, Transfer Pricing
PricewaterhouseCoopers, Chicago
312 298 6384; raoul.gonzalez@pwc.com

Raoul is a Principal with PwC's Transfer Pricing Group. Raoul has led a wide variety of transfer pricing projects that include planning, audit defense, documentation, and APAs. Raoul specializes in the valuation of intangible assets and economic analysis of intercompany pricing strategies for Fortune 500 multinational companies. He has worked on a number of intellectual property and cost-sharing projects, involving the valuation of intangible assets, derivation of buy-in payments and implementation of complex strategies to assist multinational companies structuring their value chain functions and realigning intellectual property assets in a tax and treasury efficient manner.

Raoul received a Ph.D. in economics from Universitat Pompeu Fabra (Barcelona - Spain), where he specialized in Industrial Organization and Corporate Finance. He is fluent in French and Spanish.

Dan McMann
Partner, International Tax Services
Ernst & Young, Detroit
313 628 8740; daniel.mcmann@ey.com

Dan is a Partner with EY's International Tax Services Group and covers the Cleveland market. In this role, Dan consults with multinational corporate clients regarding complex cross-border tax matters with an emphasis on international mergers and acquisitions, carve-outs, spin-offs, tax efficient supply chain management, foreign tax credits, transfer pricing and repatriation. Dan has over 20 years of international tax consulting experience working with companies in a variety of industries. Prior to joining EY, Dan spent four years with another Big 4 Accounting firm including a two-year rotation to Frankfurt, Germany.

Dan received his Masters of Science in Taxation from University of Toledo, and his undergraduate degree in Business Administration with a concentration in Accounting from the University of Toledo.

Greg Rosko
Partner, Tax
PricewaterhouseCoopers, Cleveland
216 212 9744; gregory.rosko@pwc.com

As a partner with PwC, Greg has the unique opportunity to connect his passion for learning and teaching to providing value adding tax counsel to his clients. Clients view their interactions with Greg as a chance to benefit from the deep knowledge and insights he's gained in almost two decades of advising and acting as a tax advocate to multinational corporations and shareholders. Clients appreciate Greg's collaborative and transparent approach, considering him a go-to advisor for translating complex accounting and tax matters in to practical, actionable advice.

Greg is licensed as a CPA in Ohio and Pennsylvania, and a lawyer in Ohio. He holds a BS in Accountancy from John Carroll University; a Master's of Taxation from the University of Denver; and, a J.D. from The Cleveland-Marshall College of Law.

Joshua Ruland
Executive Director, International Tax Services
Ernst & Young, Washington, D.C.
202 327 7238; joshua.ruland@ey.com

Joshua Ruland is an Executive Director in Ernst and Young LLP's International Tax Services practice in the National Tax Department. He is based in Washington, D.C., and advises clients on all aspects of US international and partnership taxation, particularly cross-border acquisitions, dispositions, joint ventures and restructurings.

Prior to joining EY, Joshua was a Senior Counselor in the Corporate Tax Department of Hess Corporation, a US-based multinational oil and gas company. At Hess, Joshua designed and implemented cross-border restructurings and repatriations, and provided tax advice related to acquisitions, dispositions, joint ventures, master limited partnerships, restructurings and other major corporate transactions. He was based in New York, NY, and Houston, TX.

Prior to that, Joshua was a law clerk for the Hon. Cornelia G. Kennedy of the United States Court of Appeals for the Sixth Circuit, based in Detroit, MI.

Joshua earned a B.B.A., with distinction, from the Ross School of Business at the University of Michigan. He earned his J.D., *cum laude,* from the University of Michigan Law School.

Rupesh Santoshi
Partner, International Tax Services
Ernst & Young, Pittsburgh
612 371 6337; rupesh.santoshi@ey.com

Rupesh Santoshi leads Ernst & Young LLP's Transfer Pricing practice in North East Ohio and Western Pennsylvania. He serves several Fortune 500 diversified industrial product companies advising them on transfer pricing matters.

Rupesh has more than 20 years of experience in providing transfer pricing advisory services ranging from global documentation to controversy management and planning. His recent transfer pricing experiences include serving companies in the industrial products, retail/consumer products, agricultural, pharmaceutical, and medical device sectors. Rupesh has assisted companies with BEPS assessments, supply chain restructurings, intercompany pricing planning, documentation, and controversy management. His work has been used to negotiate unilateral and bilateral advance pricing agreements and to support worldwide restructurings, cost-sharing arrangements, intercompany license agreements, contract services, financing and intellectual property management structures and US state tax planning projects.

Rupesh holds a Master Business Arts in Finance and Marketing from the Northwestern University's Kellogg School of Management and a Master of Arts in Economics from the University of Chicago. In addition, he obtained a Bachelor of Arts in Economics from the University of Illinois, Chicago. He is a frequent speaker at industry and trade conferences and co-author of articles on the economics of intercompany pricing in *World Trade Magazine* and *The Economic Times*.

Michael F. Urse
Partner, International Tax Services
PricewaterhouseCoopers, Cleveland
216 523 3358; michael.urse@pwc.com

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. 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. 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
Partner, International Tax Services
PricewaterhouseCoopers, Cleveland
216 875 3499; matthew.d.wallace@pwc.com

Matt is a partner at PwC and leads the International Tax Services practice in PwC's Cleveland office. 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 principal 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. He holds a B.S. from The Ohio State University and an MST from American University.