Registration
15th Annual International Tax Conference

Wednesday, March 16, 2016
8:00 am – 4:00 pm

REGISTER ONLINE by March 11, 2016:
https://www.regonline.com/AkronTax2016

-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 11, 2016.

Occupation: CPA___________ Faculty ____________
Attorney________ Student ____________
PA ____________ Other______________

Purpose of Conference

The 15th 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 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. Nancy Stott, School of Accountancy, The University of Akron, Akron, Ohio 44325-4802 by March 11, 2016 or see the online registration information below.

Convenient Online Registration

You may also register online by March 11, 2016 at https://www.regonline.com/AkronTax2016.

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

The University of Akron

Announcing:
15th Annual International Tax Conference
Wednesday, March 16, 2016 - 8:00 am-4:00 pm
Return by March 11, 2016

The University of Akron is an Equal Opportunity Employer

15th Annual International Tax Conference

Wednesday, March 16, 2016
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/AkronTax2016

15th Annual International Tax Conference
Wednesday, March 16, 2016

Program

7:40 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 Tax Conferences
Dr. Thomas G. Calderon, Chair, School of Accountancy

8:30 am – 9:15 am
M&A Tax Update
Bradley Thompson, CPA / Matt Chen, CPA

9:15 am – 10:15 am
Planning in the Current Environment
Michael Urse, J.D., CPA / Alan Higgins, CPA

10:15 am – 10:30 am
Break

10:30 am – 11:30 am
International Tax Technical Update
Matthew Wallace, CPA / David Joranko, CPA

11:30 am – 12:15 pm
Transfer Pricing Update – Operational BEPS & Country-by-Country Reporting
Raoul Gonzalez / Ann Marie Achille, CPA

12:15 pm – 1:45 pm
Buffet lunch presentation: Tax Legislative Policy in an Election Year: Outlook for 2016
Scott McCandless, J.D.

1:45 pm – 2:45 pm
Foreign Tax Law Update
Matthew Ryan / Brandon Roytberg, J.D., CPA

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

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

15th Annual International Tax Conference Planning Committee

Thomas Calderon	*Alan Higgins*	*Il-Woon Kim*
Alvin H. Lieberman	*Michael Urse*	*Matthew Wallace*
	Rolla Zahrawi	

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 has been 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 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. 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.

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.

Brandon Roytberg
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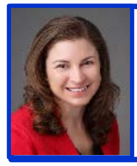
Brandon is a Director in PwC's International Tax Services in the Cleveland office. He has over 9 years of experience working with outbound and inbound multinationals in leveraging and enhancing their global competitiveness through cost-effective tax planning and execution. His diverse client base experience 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.



Ann Marie Achille
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Ann Marie is a Partner in the Tax Reporting & Strategy practice of PwC with over 15 years of combined audit and tax experience. She works with clients to get the most out of their tax functions though optimizing process, utilizing human capital strategically, maximizing investments in technology and leveraging data for both reporting and strategic tax decision making. Ann Marie is responsible for the delivery of tax reporting and tax transformation engagements, including tax function design and integration, global balance sheet reconciliations, preparation and review of global consolidated tax provision computations, and implementation of tax reporting technology to support these efforts.

Ann Marie holds a M.S. in Accountancy magna cum laude and a Bachelors of Business Administration in Accountancy cum laude from the University of Notre Dame and serves on Notre Dame's Accountancy Department Advisory Board. Ann Marie is a Certified Public Accountant licensed in Illinois and is a member of the AICPA and the Illinois CPA Society.

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 and 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.

Raoul Gonzalez
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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. The companies he has assisted are in a broad range of industries, including quick service restaurants, life sciences, beverages, automotive, mining, financial services, agribusiness, insurance, oil and gas, and retail.

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.

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.

David B. Joranko
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David B. Joranko is a National Tax Partner in the International Tax Quantitative Services practice of Ernst & Young LLP. He is based in Cleveland, Ohio. Dave has over 30 years of experience assisting U.S. multinational businesses with U.S. tax planning and reporting related to their international operations. His areas of focus include the U.S. foreign tax credit, U.S. export tax incentives, controlled foreign corporation and foreign branch calculations and cross-border structuring. Dave has also assisted clients in determining their U.S. Production Activities Deduction under Section 199.

David has been a frequent speaker for the Council for International Tax Education, ATLAS, the Tax Executives Institute, and the FSC/DISC Tax Association. He authored the July 15, 1996 Tax Notes International article "A FSCful of Dollars: Maximizing FSC Benefits through Transaction Level Pricing" and the November 27, 2000 TNI article on the FSC Repeal and Extraterritorial Income Exclusion Act of 2000. David holds a J.D. from The Ohio State University College of Law and a B.A. in Business Administration from Duke University. He is a CPA in Ohio, Illinois, New York and Georgia and is also a member of the Ohio Bar Association. David is a member of the AICPA and the Ohio CPA Society.

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Scott McCandless is a principal in PwC's Tax Policy Services (TPS) practice within the Washington National Tax Services practice. Prior to re-joining PwC in 2014, Scott served as Tax Counsel to Congressman Tim Griffin, a Member of the U.S House of Representatives, Committee on Ways & Means. Scott advised Congressman Griffin on a wide range of tax and trade matters including tax reform proposals. Previously, Scott spent 2011 and 2012 serving as Tax Counsel to U.S. Senator Olympia J. Snowe, Ranking Member of the Senate Small Business and Entrepreneurship Committee. Senator Snowe was one of the Senior Members of the Senate Finance Committee and Scott handled the Senator's broad portfolio of tax and trade issues.

Prior to joining Senator Snowe, Scott was a director in PwC's Washington National Tax Services practice where he provided strategic advice as well as legislative, executive branch, and regulatory representation for domestic and international clients of PwC on a broad spectrum of issues including taxation and international trade, with a focus on energy tax policy. Scott has authored several articles published in Tax Notes regarding the energy tax titles in recent legislation and on broader energy policy.

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 1-1/2 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.

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Matthew Ryan is a UK tax partner based in PwC's New York office where he leads the UK tax desk. Matt has a key role in the UK firm's international structuring practice. Prior to moving to New York, Matt led the UK's Inbound Structuring Group and was responsible for developing the firms strategy for maximizing the benefits of the UK's corporate tax reforms for inward investors to the UK which has involved liaising closely with the UK Revenue and Treasury authorities. Additionally, Matt was a member of PwC's International Tax Structuring Planning Group, a core team of partners drawn from the global network with the responsibility for assisting jurisdictions develop best in class inbound and outbound investment structures. As a result of these roles Matt has knowledge of the key aspects of many of the tax systems around the world and has an excellent personal network of the leading international structuring partners in the PwC Global organization.

Matt has worked on international tax issues for the past 17 years, advising a range of public and private multinational companies of all sizes in all sectors but predominantly US MNC's. Matt holds an Economics and Business Finance Degree (BsC) and is a qualified accountant with the Institute of Chartered Accountants in England and Wales. He is also the author of a number of articles on International Tax.