

## Registration 11<sup>th</sup> Annual International Tax Conference

Wednesday, April 4, 2012  
8:00 a.m.–3:00 p.m.

Please type or print

Email address \_\_\_\_\_

Name(s) \_\_\_\_\_

Name of Organization \_\_\_\_\_

Address \_\_\_\_\_

Zip \_\_\_\_\_

Number attending at \$95 \_\_\_\_\_

Total Amount Enclosed \_\_\_\_\_

### Lunch Selection (Choose one per person):

Herb Encrusted Breast of Chicken

Grilled Vegetable Tower

Stuffed Colossal Baked Potato with Sirloin Tips

### Method of Payment

Check enclosed payable to The University of Akron

Charge to credit card  Visa  MC  Discover

Card Number \_\_\_\_\_

Exp. Date \_\_\_\_\_

Occupation:  CPA  Faculty

Attorney  Student

PA  Other

Enclose your registration (checks payable to The University of Akron), detach, and return by March 28, 2012 to:

Jan Kotila  
George W. Daverio School of Accountancy  
The University of Akron  
Akron, Ohio 44325-4802  
[jank@uakron.edu](mailto:jank@uakron.edu)

(330) 972-7588 (Phone)

## Purpose of Conference

The 11<sup>th</sup> 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 6.25 Continuing Professional Education (CPE) credit approved by the Accountancy Board of Ohio, and 5.00 credit hours as approved by the Ohio Supreme Court Commission on Continuing Legal Education, including 0 hours in ethics, 0 hours in substance abuse, and 0 hours in professional instruction. Forms to validate attendance will be available at the conference.

## Registration Fee

The conference is presented as a public service to the tax community. The registration fee is \$95 and includes course materials, in-depth outlines, continental breakfast, lunch and refreshment breaks.

To register, please complete the registration form in this brochure, include your check or money order made payable to the University of Akron, and mail to Ms. Jan Kotila, School of Accountancy, University of Akron, Akron, OH, 44325-4802 by March 26, 2012. You may register online with a credit card. Go to this link: [www.uakron.edu/cba/acct](http://www.uakron.edu/cba/acct) and click on the tax conference button and then the "Register Here" button.

## Parking

Parking is free at Doubletree Hotel parking lot.

## Who Should Attend This Conference?

Accountants, attorneys, business persons and other professionals with an interest in recent developments in the area of international tax will gain much from this conference.

Announcing:  
Eleventh Annual International Tax  
Conference  
Wednesday, April 4, 2012 8:00 a.m.-  
3:00 p.m.  
Return by March 28, 2012  
The University of Akron is an Equal Opportunity Employer

The University  
of Akron

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

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# Join us.

## 11<sup>th</sup> Annual International Tax Conference

Wednesday, April 4, 2012

8:00 a.m. – 3:00 p.m.

CPE Credit: 6.25 hrs

CLE Credit: 5.00 hrs

0 hours Ethics, Substance Abuse,  
Professional Instruction

Registration Fee: \$95 (includes lunch on site)

### Location

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

### 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 MTax Program  
at The University of Akron, the premier  
MTax Program of Ohio.

Register for the conference online at:  
[www.uakron.edu/cba/acct](http://www.uakron.edu/cba/acct) Click on  
"International Tax Conference," then  
"Register Here"

# 11<sup>th</sup> Annual International Tax Conference

## April 4, 2012

### Program

**8:00 a.m. – 8:25 a.m.**  
**Registration and Continental Breakfast**

**8:25 a.m. – 8:30 a.m.**  
**Welcome from Alvin H. Lieberman, Daverio School of Accountancy**

**8:30 a.m. – 9:45 a.m.**  
**Statutory/Regulatory Developments (75 minutes)**

- Section 909 Regulations
- 861 Regulations
- Ongoing Regulatory Projects
- Section 954(c)(6)

Mike Urse, JD, CPA / Alan Higgins, CPA

**9:45 a.m. – 10:30 a.m.**  
**Transfer Pricing Update (45 minutes)**  
Bill Hahn, CPA / Brendon Daly, JD, CPA / Karl Rothfuss, CPA

**10:30 a.m. – 10:45 a.m. Break (15 minutes)**

**10:45 a.m. – 11:45 a.m.**  
**Value Chain Planning (60 minutes)**  
John Ranke, JD, CPA

**11:45 a.m. – 1:00 p.m.**  
**Lunch / Territorial Tax Legislative Proposals for 2012 & Beyond (75 minutes)**  
Michael Mundaca, JD, LL.M.

**1:00 p.m. – 1:45 p.m.**  
**International Tax Compliance & Reporting Update (45 minutes)**  
Dave Joranko, CPA

**1:45 p.m. – 2:15 p.m.**  
**Foreign Law Updates (30 minutes)**  
Erik Rosenfeld, CPA

**2:15 p.m. – 3:00 p.m.**  
**Financial Products and Hedging (45 minutes)**  
Rebecca Lee, JD, LL.M.

### Questions & Answers

#### Eleventh Annual International Tax Conference Planning Committee

Erik Rosenfeld	Alan Higgins
Matthew Wallace	David Joranko
Alvin H. Lieberman	Il-Woon Kim



**Michael F. Urse** is a Partner at PwC and is the co-leader of PwC's U.S. international tax practice, and co-national leader of PwC's Integrated Global Structuring (IGS) team. The IGS team designs and implements global structuring solutions that include foreign debt restructurings, optimization of the use of foreign tax credits, and efficient cash redeployment and repatriation. Michael 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.). He has also worked extensively on tax efficient foreign acquisition structuring and integration.

Michael has 27 years of international tax experience serving numerous U.S. and foreign-based multinationals. From July 1990 to September 1991, Michael was on special assignment in the Firm's New York office managing the U.S. international tax desk. Michael has made frequent speeches and webcasts and has been 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.

Michael 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.



**Alan W. Higgins.** As Ernst & Young LLP's International Tax Services group market leader for Northeast Ohio, Alan serves a number of U.S. and foreign based companies. He has over 29 years experience in taxation, the last 22 focused on international taxation matters affecting multinational enterprises. He has extensive experience in U.S. and foreign country transfer pricing matters, supply-chain planning, cross-border 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 and North Carolina. He is a member of several professional organizations, including the American Institute of CPAs. Alan also teaches part-time in the MTax program at The University of Akron



**Bill Hahn** is the leader of the North American Automotive Transfer Pricing Practice for PwC and is a Principal based in the Detroit office. He has over 20 years of transfer pricing and valuation experience focused on the automotive and general manufacturing industries. In addition to automotive documentation, policy, APA and examination resolution projects for clients Bill also established and managed a transfer pricing practice in Mexico City, Mexico, where he resided for 3 years.

Bill has been recognized as one of the World's Leading Transfer Pricing Advisors and is a frequent author and speaker.

Bill holds a B.A. in Economics from Northern Illinois University and an M.B.A. from the University of Illinois.



**Brendan Daly** is Director of PwC's Transfer Pricing practice in the firm's Lake Erie market. He has considerable experience in developing and managing US, non-US, regional, global and state transfer pricing planning and documentation projects. In addition, he has experience assisting clients with business restructurings, including valuing exchanges involving intellectual property, technology, trade names, product lines and other forms of intangible property.

His experience includes analyzing transfer pricing issues across a broad set of industries, including health care, specialty chemicals, automotive, alcoholic beverage, consumer products, metals and other manufacturing and distribution businesses.

Brendan has experience in developing and negotiating audit defense with US, non-U.S. and state tax authorities, as well as Advanced Pricing Agreements.

Brendan received his B.S. in Accounting/Finance from the State University of New York at Buffalo and his JD/MTax from The University of Akron School of Law.



**John Ranke** is the U.S. Value Chain Transformation Leader and an international tax partner in the Chicago office of PwC. He specializes in leading large-scale strategic tax optimization engagements for multinational companies designed to deliver long-term tax efficiency through the implementation of business alignment, foreign tax reduction and cash redeployment structures.

Throughout his 28 years with the firm, John has held a variety of positions within the U.S. International Tax Services (ITS) practice of PwC including National Practice Leader, leader of the ITS Business Solutions practice, and leader and co-founder of the Vision practice dedicated to delivering effective tax rate reduction to complex multinational companies.

John has worked with sophisticated multinational clients throughout the United States in various industries including high-technology, consumer products, industrial products, automotive, pharmaceutical, health products and services.

John holds a B.B.A. from The University of Michigan and a JD from Wayne State University. He is a CPA and an attorney in the state of Michigan and a member of the AICPA, MACPA, American Bar Association, State Bar of Michigan and International Fiscal Association.



**Michael F. Mundaca** is a Co-Director of the National Tax Department and the Americas Tax Center at Ernst & Young LLP. Prior to rejoining Ernst & Young in 2011, Michael served at the U.S. Treasury Department as the Assistant Secretary for Tax Policy, at the appointment of President Obama, heading the Treasury Department's Tax Policy Department and advising Treasury Secretary Geithner on all matters relating to taxation. Upon leaving Treasury, he received the Alexander Hamilton Award, the Treasury Department's highest honor.

Prior to his appointment as Assistant Treasury Secretary, Michael served from 2007-2009, during both the Bush and Obama Administrations, as the Deputy Assistant Treasury Secretary for International Tax Affairs. He represented the U.S. at various international forums, including the Organization for Economic Cooperation and Development, as well as in the negotiation of various tax treaties and other international agreements.

Michael also served at the Treasury Department from 1997-2002, during both the Clinton and Bush Administrations, in Tax Policy's Office of the International Tax Counsel, leaving as Deputy International Tax Counsel.

From 2002-2007, Michael was a principal in the International Tax Services group of E&Y's National Tax Department in Washington, DC. Prior to joining Treasury in 1997, he worked at Sullivan & Cromwell, a New York law firm.

Michael holds a B.A. from Columbia University, an M.A. from the University of Chicago, a JD from the University of California, Berkeley, and an LL.M. from the University of Miami.



**David B. Joranko** is a Partner in Ernst & Young's National Tax Department and currently serves as the National Leader for the firm's International Tax Compliance and Quantitative Consulting Services practice. Based in Cleveland, Dave has over 26 years of experience assisting U.S. multinational businesses with U.S. tax planning and reporting related to their international operations. Dave's 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.

Dave 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 JD 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.



**Erik Rosenfeld** is a Partner in International Tax Services, in the Cleveland office of PwC. Erik has fourteen years of experience in corporate tax and eleven years concentrating on international tax consulting. During this time, Erik has worked with numerous multinational companies, predominantly U.S. based manufacturers, to employ international holding company structures, enhance foreign tax credit utilization, navigate anti-deferral rules, and structure operations to minimize the worldwide effective tax rate.

Erik has also assisted many corporations in designing restructuring alternatives at the lowest tax cost, within the limitations of the reorganization provisions. From 2006 through 2008, Erik completed a tour at PwC's Washington National Tax Services practice. 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.



**Rebecca Lee** is a Principal in PwC's international Tax Services Group in the Washington National Tax Practice. She consults with the firm's practice offices and clients on domestic and international tax issues arising in complex financial transactions, including swaps, forwards, futures, options, repo agreements, debt issuances and equity transactions. Rebecca's experience includes advising on the special rules applicable to financial transactions, including debt issued with original issue discount,

premium and market discount, constructive ownership transactions, constructive sales, short sales, hedging transactions, straddles, securities lending transactions and debt modifications. Rebecca's practice includes both the outbound and inbound consequences of such financial transactions, including withholding, subpart F determinations and foreign currency issues.

Prior to joining PricewaterhouseCoopers LLP, Rebecca was an associate with a Washington, D.C. law firm, focusing on the tax aspects of financial and cross-border structuring transactions. Rebecca was also an attorney with the National Office of the IRS Office of Chief Counsel. Rebecca started as a General Attorney (Tax) in the IRS Office of Chief Counsel's Financial Institutions & Products Division, but held positions in the Office of the Senior Counsel to the Chief Counsel (Tax Shelters) and as the Assistant to the Chief Counsel, reporting directly to the Chief Counsel and assisting the Chief Counsel and both Deputy Chief Counsels on a broad range of technical and operational matters.

Rebecca has a B.A., from College of William and Mary in International Relations and Economics (Double Concentration), a JD magna cum laude from Tulane Law School and an LL.M. in Taxation with distinction from Georgetown University Law Center. Rebecca is a member of the Virginia Bar and the District of Columbia Bar.