

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 & Smith LLP</i>

	<i>Protecting Your Exit Strategies</i>	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>
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	<p>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.</p>	<p>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></p>
<p>3:15 – 3:30</p>	<p>Break</p>	
<p>3:30 – 5:15</p>	<p>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.</p>	<p>Pat Chaback, Executive Director - <i>EY</i> Kimberly Edwards, Director, Western Compliance – <i>IRS</i> Eric Johnson, Tax Director – <i>Ross Stores; TEI Silicon Valley</i></p>

	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>