

40th Annual TEI-SJSU High Tech Tax Institute

November 4 & 5, 2024

Crowne Plaza Cabana, 4290 El Camino Real, Palo Alto, CA

<https://www.sjsu.edu/taxinstitute/>

Monday November 4

Time	Topic	Presenters
7:30 – 8:20	Registration & refreshments	
8:20 – 8:30	Welcome	Fenella Salomonsson; President – <i>Silicon Valley TEI Chapter</i> ; Tax Director, AeroVironment Dr. Priya Kannan, Dean – SJSU Lucas College & Graduate School of Business Annette Nellen, MST Program Director – <i>SJSU</i>
8:30 – 10:15	International High Technology U.S. Tax Current Developments	David Forst, Partner - <i>Fenwick & West LLP</i> Julia Ushakova-Stein, Partner - <i>Fenwick & West LLP</i> ; Adjunct faculty – <i>SJSU MST Program</i>
10:15 – 10:30	Break	
10:30 – 11:25	Keynote speaker – IRS Commissioner Danny Werfel	IRS Commissioner Werfel Introduction by Kathleen Kruchten, IRS Interviewer – Terry Lemons, Communications & Liaison Chief - IRS
11:25 – 12:15	Lunch	
12:15 – 1:50	BREAKOUT A The Latest and Greatest in Equity Compensation BREAKOUT B Where is the Guidance and Is It Binding? Loper and Other News	Page W. Griffin, Partner - <i>Skadden</i> Michael Klippert, Partner – <i>Wilson Sonsini</i> Tommy McCollister, Sr. Manager - <i>Armanino</i> Robb Chase, Partner – <i>Eversheds Sutherland</i> Mindy Herzfeld, Professor of Practice - <i>University of Florida, Levin College of Law</i> Joseph (Jud) Judkins, Partner – <i>Baker & McKenzie</i> Robert J. Kovacev, Member – <i>Miller & Chevalier</i>
1:50 – 3:25	R&D in Uncertain Tax Times	Tony Coughlan, Sr. Manager – <i>RSM</i> Kevin Dangers, Partner – <i>EY</i> Ellen McElroy, Partner – <i>Eversheds Sutherland</i> Laura Morris, Principal – <i>BDO</i> Scott Vance, Associate Chief Counsel (Income Tax and Accounting) – <i>IRS</i>
3:25 – 3:40	Break	
3:40 – 5:10	Breakout C What’s New in M&A? BREAKOUT D AI in the Corporate Tax Department – Let’s See It!	Bryan Keith, Managing Director – <i>Andersen Tax</i> Eileen Marshall, Partner - <i>Cooley</i> Sarah-Jane Morin, Partner – <i>Morgan, Lewis</i> Myra Sutanto Shen, Partner – <i>Wilson Sonsini</i> Tyler Gasperlin, Sr Innovation Manager – <i>Moss Adams</i> Greg Homen, Partner & AI Transformation Program Leader for Tax - <i>KPMG</i> Stephen Bonovich, VP Tax - <i>OpenAI</i> Kate Riemersma, Partner – <i>Deloitte</i>

Tuesday November 5

Time Slot	Topic	Presenters
7:30 – 8:20	Registration & coffee	
8:20 – 9:20	Accounting for Income Taxes	Michael Chen, Partner – <i>Baker Tilly</i> Carlene Ha, Partner – <i>Deloitte</i> David Murdock, Partner – <i>Grant Thornton</i>
9:20 – 10:35	Pillar 2	Marcus Heyland, Principal – <i>KPMG</i> Ethan Kroll, Partner – <i>Baker & McKenzie</i> Jason Whelan, Senior Manager, Int'l Tax – <i>Grant Thornton</i> Andrew Wigmore, Senior Counsel - <i>IRS Office Chief Counsel (Int'l)</i>
10:35 – 10:50	Break	
10:50 – 11:50	BREAKOUT E Global Mobility Best Practices BREAKOUT F IP Development in Other Countries	Oksana Lapii, Sr. Manager – <i>EY</i> Miriam Chang, Director – <i>Andersen Tax</i> Grace Shie, Partner – <i>Mayer Brown</i> Lonnie Brist, Managing Director – <i>Andersen Tax</i> Julia Fang, Partner - <i>PwC</i> Channing Flynn, Partner - <i>EY</i> Robin Hart, Principal – <i>Charles River Associates</i>
11:50 – 12:30	Lunch	
12:30 - 1:25	Luncheon Speaker Washington DC – Election Outlook	Dave Kautter, Partner – <i>RSM</i> (Former Assistant Secretary of Tax Policy at Treasury and former acting IRS Commissioner)
1:30 – 2:45	BREAKOUT G The Future of the Corporate Tax Department + Recognize Silicon Valley TEI Chapter Presidents BREAKOUT H Monetizing Energy and CHIPS Tax Credits – Tax and GAAP Relevance	Stephen Dunphy, Sr. VP Tax – <i>Ross Stores</i> Jay Fenlaw, Partner – <i>EY</i> Fenella Salomonsson, Tax Director - <i>AeroVironment</i> Benjamin R. Shreck, Tax Counsel – <i>TEI</i> Alan Zhao, Sr. Manager - <i>KPMG</i> Jared Huish, Partner - <i>KPMG</i> Wendy Punches, Managing Director - <i>PwC</i> Gabe Rubio, Principal – <i>BDO</i> Brent Sabot, Manager – <i>RSM</i>
2:45 – 3:00	Break	
3:00 – 4:30	Federal Tax Controversy – Year 2 of the Strategic Operating Plan	Elizabeth Askey, Chief – <i>Independent Office of Appeals</i> Paul DiSangro, Partner – <i>Mayer Brown LLP</i> Kathleen Kruchten, Director, Western Compliance – <i>IRS</i> Emily Lam, Partner - <i>Skadden, Arps LLP</i> Howard Schneck, Sr Director, Corporate Tax, <i>Varian</i>
4:30 – 5:30	Domestic and Multistate Tax Update	William Gorrod, Partner - <i>Morgan, Lewis</i> Annette Nellen, Professor – <i>SJSU MST Program</i> Christanna Springs, Partner – <i>Deloitte</i>