

Mindy Herzfeld
517 Rockford Road
Silver Spring, MD 20902
herzfeld@law.ufl.edu

EXPERIENCE

Current Positions

UNIVERSITY OF FLORIDA LEVIN COLLEGE OF LAW, Gainesville, FL
Professor of Tax Practice 2017-Present
Teach advanced courses on tax policy and international taxation topics to LL.M. and J.D. students. Responsible for developing and implementing new initiatives for the graduate international tax program, including:

- Coordinated and delivered one-week program in U.S. taxation for visiting students from Spanish law school (March 2019)
- Organized diversity career event for tax students (March 2019)
- Developed, organized, and ran one-week course off-site in Miami for alumni and other non-U.S. practitioners (August 2018)
- Organized U.S.-China tax conference in Shanghai for Chinese and U.S. academics, government officials and practitioners in conjunction with East China University of Political Science & Law (June 2018)
- Organized side-event at U.N. tax committee meeting for students to present their research papers to members of tax committee

POTOMAC LAW GROUP, Washington, D.C. 2021-Present
Counsel

Advise U.S. and foreign individuals and multinational companies on cross-border investments and restructurings. Provide consulting advice to public companies and accounting firms on tax policy developments. Consult with investors on tax related issues relevant to companies' market valuations.

TAX ANALYSTS, Falls Church, VA 2017-Present
Contributing Editor, Tax Notes International

Outside contributor to publication on international tax; author of regular column on topics related to global tax policy developments, U.S. international tax and tax reform, and cross-border transactions.

Prior Experience

IVINS, PHILLIPS & BARKER, CHTD. Washington, D.C. 2017-2021

Of counsel

Advise U.S. and foreign individuals and multinational companies on cross-border investments and restructurings. Consult with investors on tax related issues relevant to companies' market valuations.

TAX ANALYSTS, Falls Church, VA

2014-2017

Contributing Editor, Tax Notes International

Contributing editor responsible for developing and authoring weekly column on international tax policy developments and cross-border transactions for publication in Tax Notes International; provide guidance and mentoring to Tax Analysts daily news reporters on topics and technical content. Quoted regularly in legal articles, government publications, and mainstream press. Promoted to senior editor after two years in recognition of success in building brand name and global reputation among tax community for insightful commentary and analysis.

UNIVERSITY OF MARYLAND CAREY SCHOOL OF LAW,

Baltimore, MD

Spring 2015

Adjunct Professor of Law

Instructor for J.D. class in U.S. international taxation.

DELOITTE TAX LLP, Washington, DC

Senior Manager, New York International Tax Services

2008 – 2014

Senior Manager, Washington International Tax Services

2004 – 2008

Provided transactional advice to U.S. and foreign multinational corporations, private equity funds, venture capital funds and wealthy individuals on a broad range of cross border tax issues. Structured acquisitions, joint ventures, and dispositions including spinoffs. Led complex cross-border restructuring projects. Conducted reviews for due diligence and audit purposes of companies' financial statement tax positions. Served as lead international tax advisor for a range of public and private clients, including audit and non-audit clients. Lectured at Deloitte internal training and client events.

Representative transactions include:

- Representing publicly-traded Dutch multinational in joint venture with privately-held Canadian company involving merger of U.S. operations under new holding company structure.
- Advising large venture capital fund on new foreign acquisitions, structuring of dispositions, and U.S. tax implications of foreign restructurings for passthrough investors. Review of and sign-off on LP financials.
- Structuring of IP migration of European intellectual property for U.S. multinational into new pan-European holding company.
- Development of audit procedures for supply chain restructuring for large U.S.

multinational.

- Review of repatriation strategies for audit clients.
- Advice on structuring of split-up of publicly traded company into three new companies, including lead role in coordinating foreign restructurings and global tax teams.
- Advising on internal restructuring for large financial services company.
- Advising software application company on various foreign acquisitions, including due diligence and structuring.
- Advising private equity client on potential acquisition of shipping company.
- Advising French multinational on inbound investments and restructurings.
- Advising large family-owned businesses on acquisitions and restructurings.
- Advising foreign individual with U.S. citizenship on U.S. tax return filings.

KPMG LLP, Washington DC

2001 – 2002

Senior Manager, Mergers & Acquisition Group, Washington National Tax.

MCKEE NELSON, ERNST & YOUNG LLP, Washington, DC

2000 - 2001

Associate. Advised clients and researched and drafted memoranda, opinion letters, and private letter rulings in connection with complex corporate tax issues.

FORD MOTOR COMPANY, Dearborn, MI

1998 - 2000

Tax Attorney, Office of Tax Counsel. Provided transactional and tax planning support for creation of new business units, acquisitions, and divestitures.

WEIL, GOTSHAL & MANGES LLP, New York, NY

1996 - 1998

Associate, Tax Department. Drafted private letter ruling for complex spin-off transaction involving first-time application of newly enacted section 355(e). Drafted tax disclosures for SEC filings. Drafted and negotiated tax sections of M&A deal documents. Advised on complex financial instruments.

JUDGE I. LEO GLASSER

U.S. District Court, Eastern District of New York

1995-1996

Law Clerk. Researched and prepared bench memoranda for civil motions.

EDUCATION

Georgetown University Law Center, L.L.M. *with distinction*, 2003

GPA 3.8/4 (A)

Graduate Tax Scholar

Tannenwald Writing Competition Award: *The Intersection of U.S. Tax Policy and U.S.*

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Foreign Policy

Publication: *Restricting the Flow of Funds from U.S. Charities to International Terrorist Organizations: A Proposal*, 56 THE TAX LAWYER 4: 875-891 (2003)

Yale Law School, J.D., 1995

Yale Law Journal, Senior Editor; Officer and Co-Chair of Admissions Committee

Yale Law and Policy Review, Editor

New York University Law School, visiting student, Fall 1994

Research Assistant, Professor Harvey Dale

Yale University Graduate School of Arts and Sciences, 1990-1996

Ph.D. candidate. Department of History of Science and Medicine Completed all requirements for degree but dissertation

NSF Fellowship in the History of Science

Barnard College, B.A.,

1990 magna cum laude Phi

Beta Kappa

Byrne History Prize

PUBLICATIONS (excluding Tax Analysts)

Mindy Herzfeld, INTERNATIONAL TAXATION IN A NUTSHELL (West, 12th ed. 2020)

Mindy Herzfeld, *The Role of Professional Organizations in Practice and Policy: How Lawyers Overtook Accountants and Economists in the Early 20th Century Tax Field*, Upcoming in The Tax Lawyer, Fall 2021

Mindy Herzfeld, *Designing International Tax Reform: What Went Wrong?* Upcoming in ITAX Dec. 2021

Mindy Herzfeld, *US Tax Reform: A Multilateral Success?* 2019 British Tax Rev. 487.

Mindy Herzfeld, *Debate on the US Tax Reform and the EU ATAD: Can GILTI + BEAT = GLOBE?*, 47 InterTax 504 (2019)

Mindy Herzfeld, *US Perspectives on the Multinational Instrument* 46 InterTax 80 (2018)

INTERNATIONAL TAXATION IN A NUTSHELL (West, 11th ed. 2018) (*with Richard Doernberg*)

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Mindy Herzfeld, *The Case Against BEPS: Lessons for Tax Coordination*, 21 FL. TAX. L. REV. 1 (2017)

Mindy Herzfeld, *U.S Perspectives on the Multilateral Instrument*, 46 Intertax 1:80-85 (2018)

United States National Report to the 2013 IFA Annual Congress, Subject I: The taxation of foreign passive income for groups of companies IFA, 98a Cahiers de Droit Fiscal International, 2013 (with Yariv Brauner)

Debt Modifications –International Tax Considerations for U.S. Multinationals, 13 INT’L TAX J. 17 (2010) (with John Kennedy)

Stapled Stock Regulations Finalized as Proposed, 33 Intertax 0: 482 (2005) (with Diane Renfroe)

Proposed Regulations Issued on Treatment of Stapled Foreign Corporations, 32 Intertax Issue 12, 630-31 (2004) (with Diane Renfroe)

U.S. Tax Scene: US IRS Issues Proposed Regulations on ECI Treatment of Stock Held by Insurance Companies 32 Intertax 533 (2004) (with Thomas Fuller)

Recent and Selected Tax Notes Publications (with notable citations)

Mindy Herzfeld, *The Democrats’ New Mantra: Tax Harmonization*, 101 TAX NOTES INT’L 1095 (Mar. 1, 2021)

Mindy Herzfeld, *For Biden’s Treasury Team, Big Ideas Are About to Meet Reality*, 101 TAX NOTES INT’L 841 (Feb. 15, 2021)

Mindy Herzfeld, *The New Regulatory Architecture for U.S. International Tax*, 101 TAX NOTES INT’L 10 (Jan. 4, 2021)

Mindy Herzfeld, *Are Pillars 1 and 2 Compatible with Democracy and Sovereignty*, 100 TAX NOTES INT’L 1264 (Dec. 7, 2020)

Mindy Herzfeld, *Tax Optimism for a Post-Pandemic World*, 98 TAX NOTES INT’L 399 (Apr. 27, 2020)

Mindy Herzfeld, *Global Crises and Loss Planning*, 166 TAX NOTES FEDERAL 1709 (Mar. 16, 2020)

Mindy Herzfeld, *Realigning Tax, Trade & Treaties in a Digital Age*, 166 TAX NOTES FEDERAL 1068 (Feb. 17, 2020)

Mindy Herzfeld, *Did Treasury Weaken the TCJA?* 97 TAX NOTES INT'L 135 (Jan. 13, 2020)

Mindy Herzfeld, *A Better Alternative to Wealth Taxes*, 96 TAX NOTES INT'L 586 (Nov. 18, 2019)

Mindy Herzfeld, *From TCJA Guidance, a New Regime Begins to Emerge*, 95 TAX NOTES INT'L 665 (Aug. 19, 2019)

Mindy Herzfeld, *Gaps in the TCJA Guidance*, 95 TAX NOTES INT'L 482 (Aug. 5, 2019)

Mindy Herzfeld, *Status Check on TCJA Guidance*, 95 TAX NOTES INT'L 381 (Jul. 29, 2019)

Mindy Herzfeld, *ICAP as a Tool for Addressing the Digital Economy*, 95 TAX NOTES INT'L 183 (Jul. 15, 2019)

Mindy Herzfeld, *Treasury's Fantasy of an Integrated International System*, 95 TAX NOTES INT'L 106 (Jul. 8, 2019)

Mindy Herzfeld, *Locating Sales: FDII Regs Address Questions OECD Workplan Must Answer*, 94 TAX NOTES INT'L 1282 (Jun. 24, 2019)

Mindy Herzfeld, *FDII and Export Subsidies: Trade Politics*, 94 T TAX NOTES INT'L 1043 (Jun. 10, 2019)

Mindy Herzfeld, *Tariffs, Taxes & Trade: Shifting Dynamics*, 94 TAX NOTES INT'L 795 (May 27, 2019)

Mindy Herzfeld, *The U.N.'s Role in Rewriting International Tax Rules for the Digital Age*, 94 TAX NOTES INT'L 601 (May 13, 2019)

Mindy Herzfeld, *Reforming Capitalism: Implications for the Corporate Tax*, 94 TAX NOTES INT'L 408 (Apr. 29, 2019)

Mindy Herzfeld, *Can the OECD Fix the BEAT*, 93 TAX NOTES INT'L 1147 (Mar. 18, 2019)

Mindy Herzfeld, *Moving to Market, Competing Considerations*, 93 TAX NOTES INT'L 908 (Mar. 4, 2019)

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Mindy Herzfeld, *The OECD Consults on a New World Order*, 93 TAX NOTES INT'L 702 (Feb. 18, 2019)

Mindy Herzfeld, *Hybrids, BEPS & the TCJA*, 93 TAX NOTES INT'L 468 (Feb. 4, 2019)

Mindy Herzfeld, *Three Attempts to Fix GILTI*, 162 TAX NOTES 266 (Jan. 21, 2019)

Mindy Herzfeld, *What the OECD Can Learn From the U.S. GILTI Regime*, 93 TAX NOTES INT'L 163 (Jan. 14, 2019)

Mindy Herzfeld, *BEPS Implementation, TCJA Responses Top 2019 Agenda*, 92 TAX NOTES INT'L 1265 (Dec. 24, 2018)

Mindy Herzfeld, *Post Midterms: A Progressive Tax Agenda?*, 92 TAX NOTES INT'L 1049 (Dec. 10, 2018)

Mindy Herzfeld, *Accounting Disclosures Post-TCJA*, 92 TAX NOTES INT'L 862 (Nov. 26, 2018)

Mindy Herzfeld, *Treasury Strikes a Bold Regulatory Path Post-TCJA*, 92 TAX NOTES INT'L 679 (Nov. 12, 2018)

Mindy Herzfeld, *Germany Weighs in on Digital Debate*, 92 TAX NOTES INT'L 487 (Oct. 29, 2018)

Mindy Herzfeld, *Value Creation & Digital Profits*, 92 TAX NOTES INT'L 261 (Oct. 15, 2018)

Mindy Herzfeld, *Looming GILTI Battles*, 92 TAX NOTES INT'L 7 (Oct. 1, 2018)

Mindy Herzfeld, *Can the BEAT Fix Transfer Pricing?* 91 TAX NOTES INT'L 1203 (Sept. 17, 2018)

Mindy Herzfeld, *GDP, Transfer Pricing, and Value Creation*, 91 TAX NOTES INT'L 978 (Sept. 3, 2018)

Mindy Herzfeld, *Digital Optimism*, TAX NOTES INT'L (Jul. 16, 2018)

Cited in India Central Board of Direct Taxation, *Public Consultation on the proposal for amendment of Rules for Profit attribution to Permanent Establishment* ((Apr. 18, 2019)

Cited in Australia Treasury, *The digital economy and Australia's corporate tax system Treasury Discussion Paper* (Oct. 2018)

Mindy Herzfeld, *Splitting Digital in Two*, TAX NOTES (Jul. 6, 2018)

Mindy Herzfeld, *The Origins of GILTI*, TAX NOTES INT'L (Jun. 25, 2018)

Mindy Herzfeld, *A Post-Truth Tax World*, TAX NOTES INT'L (Jun. 16, 2018)

Mindy Herzfeld, *Tax Cuts Chaos Part IV: Can Congress Fix It?* TAX NOTES INT'L (Jun. 4, 2018)

Mindy Herzfeld, *Tax Cuts Chaos, Part III: Can Treasury Fix It?* TAX NOTES INT'L (May 21, 2018)

- Cited in: Daniel Shaviro, *The New Non-Territorial U.S. International Tax System*, 160 TAX NOTES 57 (Jul. 2, 2018)

Mindy Herzfeld, *Tax Cuts Chaos, Part II: Whither Section 367(b)?* TAX NOTES INT'L (April 2018)

Mindy Herzfeld, *Tax Cuts Chaos: Part I*, TAX NOTES INT'L (Apr. 8, 2018)

- Cited in: Patrick Driessen, *In Defense of Cross-Border Expense Apportionment*, 160 TAX NOTES 665 (Jul. 30, 2018)
- Cited in: Senate Committee on Finance, *Trump's Tax Law and International Tax: More Complexity, Loopholes and Incentives to Ship Jobs Overseas* (Jul. 18, 2018)

Mindy Herzfeld, *The OECD (Finally) Tackles the Elephant in the Room* TAX NOTES INT'L (Mar. 26, 2018)

- Cited in: Monica Gianni, *OECD BEPS (In)Action 1: Factor Presence as a Solution to Tax issues of the Digital Economy*, 72 TAX LAWYER (2018)

Mindy Herzfeld, *Digital Nexus in the EU and the United States*, TAX NOTES INT'L (Mar. 13, 2018)

Mindy Herzfeld, *The New Imperialists: Tax Bureaucrats*, TAX NOTES INT'L (Feb. 26, 2018)

Mindy Herzfeld, *Who Loses in Tax Wars*, TAX NOTES INT'L (Feb. 12, 2018)

Mindy Herzfeld, *Will Effective Tax Rates Converge?* 89 TAX NOTES INT'L 389 (Jan. 29, 2018)

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Mindy Herzfeld, *How Some Taxpayers Got Cut Out of the Tax Cuts and Jobs Act*, 89 TAX NOTES INT'L 277 (Jan. 22, 2018)

Cited in Congressional Research Rpt R45186 *Issues in International Corporate Taxation: The 2017 Revision (P.L. 115-97)* (Aug. 23, 2019)

<https://crsreports.congress.gov>

Mindy Herzfeld, *Competition or Coordination: Responses to the Tax Cuts and Jobs Act*, 89 TAX NOTES INT'L 209 (Jan. 15, 2018)

Cited in Congressional Research Rpt R45186 *Issues in International Corporate Taxation: The 2017 Revision (P.L. 115-97)* (Aug. 23, 2019)

<https://crsreports.congress.gov>

Mindy Herzfeld, *The U.S. Congress Does BEPS One Better*, 88 TAX NOTES INT'L 715 (Nov. 20, 2017)

Mindy Herzfeld, *Republicans Propose Upending the International Tax System*, 88 TAX NOTES INT'L 609 (Nov. 13, 2017)

Mindy Herzfeld, *A Territorial Move: Protecting the Base*, 157 TAX NOTES INT'L 7 (Oct. 2, 2017)

Mindy Herzfeld, *Implementing BEPS: The Official Version and the Reality, Part 2*, 86 TAX NOTES INT'L 1125 (Jun. 26, 2017)

Mindy Herzfeld, *The White Working Class and Post-2016 Tax Policy*, 155 TAX NOTES 1219 (May 29, 2017)

Mindy Herzfeld, *Will International Tax Regulations Survive Executive Orders?* 86 TAX NOTES INT'L 637 (May 22, 2017)

Mindy Herzfeld, *Parity for Corporations and Passthroughs through Integration*, 86 TAX NOTES INT'L 378 (May 1, 2017)

Mindy Herzfeld, *What is a Reciprocal Tax?* 154 TAX NOTES 1176 (Mar. 6, 2017)

Mindy Herzfeld, *Who Will Pay for Tax Reform?* 154 TAX NOTES 775 (Feb. 13, 2017)

Mindy Herzfeld, *Bursting Global Tax Bubbles*, 82 TAX NOTES INT'L 315 (Apr. 25, 2016)

Mindy Herzfeld, *Could Integration be the Antidote to Inversions?* 81 TAX NOTES INT'L 711 (Feb. 29, 2016)

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Mindy Herzfeld, *Belgian Excess Profits: The Commission Strikes Again*, 81 TAX NOTES INT'L 291 (Jan. 25, 2016)

- Cited in: Elizabeth A. Jone, *State Aid in the EU through Tax Rulings and Transfer Pricing* (Seton Hall Student Scholarship 2016)

Mindy Herzfeld, *EU Strikes down Treaty LOB Provision – What it Means*, 81 TAX NOTES INT'L 13 (Jan. 4, 2016)

Mindy Herzfeld, *U.K. Leads on BEPS Implementation While U.S. Dithers*, 80 TAX NOTES INT'L 727 (Nov. 30, 2015)

Mindy Herzfeld, *Why BEPS is Just the Beginning*, 79 TAX NOTES INT'L 983 (Sept. 21, 2015)

Mindy Herzfeld, *Splitting Profits with Communists*, 79 TAX NOTES INT'L 467 (Aug. 10, 2015)

Mindy Herzfeld, *The Inevitability of a Carbon Tax*, 79 TAX NOTES INT'L 179 (Jul. 20, 2015)

Mindy Herzfeld, *PEs and Foreign Tax Credits: Who Wins, Who Loses?* 78 TAX NOTES INT'L 320 (Apr. 27, 2015)

Mindy Herzfeld, *The Power of a Name: Stateless Income and Its Failings*, 77 TAX NOTES INT'L 1019 (Mar. 23, 2015)

Mindy Herzfeld, *Input Needed on Transfer Pricing Drafts*, 77 TAX NOTES INT'L 392 (Feb. 2, 2015)

Mindy Herzfeld, *Trends in 2014 Inversion Activity*, 144 Tax Notes 532 (Aug. 4, 2014)

Mindy Herzfeld, *Is the United Kingdom a Rogue State or Bold Leader?* 77 Tax Notes Int'l 198 (Jan. 19, 2015)

Mindy Herzfeld, *MAP Statistics Tell a Sorry Tale*, 76 Tax Notes Int'l 977 (Dec. 15, 2014)

Mindy Herzfeld, *The U.N. Rewrites International Tax Rules*, 76 Tax Notes Int'l 477 (Nov. 10, 2014)

Mindy Herzfeld, *What Can Treasury Do About Inversions?* 75 Tax Notes Int'l 595 (Aug. 25, 2014)

Mindy Herzfeld, *What's Really Driving Inversions? Walgreens Revisited*, 144 Tax Notes 393 (Jul. 28, 2014)

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- Cited in: Edward Kleinbard, '*Competitiveness*' *Has Nothing to do with It*, 144 TAX NOTES 1055 (2014)

Mindy Herzfeld, *The IRS Shuts Down the Serial 'Killer B'*, 74 Tax Notes Int'l 394 (May 5, 2014)

Mindy Herzfeld, *The Camp Proposal: A Game Changer for Multinationals*, 73 Tax Notes Int'l 1051 (Mar. 24, 2014)

Mindy Herzfeld, *What's Next in Inversion Land?* 74 Tax Notes Int'l 988 (Jun. 16, 2014)

- Cited in: J.C. Fleming Jr., R.J. Peroni, & S.E. Shay, *Getting Serious about Cross-Border Earnings Stripping: Establishing an Analytical Framework*, 93 N.C.L. L. REV. 673 (2014-15)

Mindy Herzfeld, *Political Reality Catches Up With BEPS*, 73 Tax Notes Int'l 387 (Feb. 3, 2014)

PRESENTATIONS

Panelist, *A Summary of Recent Transfer Pricing Issues*, ABA Tax Section Mid-Year Meeting, Boca Raton, FL (Jan. 2020)

Moderator, *International Ripple Effects of TCJA*, National Tax Ass'n Annual Meeting, Tampa FL (Nov. 2019)

Moderator, *The New Populism and Presidential Candidates' Tax Proposals*, The Tax Council, Washington D.C. (Nov. 2019)

Luncheon Speaker, *TCJA Regulatory Update*, Florida Tax Bar, Miami FL (Oct. 2019)

Panelist, *Treaty Developments: US Perspective*, USD/Procopio Int'l Tax Institute, San Diego, CA (Oct. 2019)

Moderator, *US and Global Tax Trends*, Morgan Stanley Investor Tax Conference, New York (May 2019)

Panelist, *US Tax Reform: How are Companies & Countries Reacting?* Global Tax Policy Conference: *Global Tax Driving the Future*, Irish Tax Institute, Harvard Kennedy School Ash Center for Democratic Governance & Innovation, Dublin, Ireland (May 2019)

Moderator, *TCJA's International Provisions: Reflections on the First Year*, National Tax Ass'n Spring Meeting, Washington, D.C. (May 2019)

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Panelist, *What's New with the US Anti-Hybrid Rules?* International Tax Institute, New York (May 2019)

Luncheon Speaker, *Hybrids, BEPS & the TCJA*, International Fiscal Ass'n USA Branch Westchester County, Stamford, CT (May 2019)

Panelist, *Digital Taxation*, Tax Foundation Global Tax Policy Retreat, Napa, CA (April 2019)

Instructor, *US Taxation*, IBFD Tax Course, Amsterdam, Netherlands (April 2019)

Speaker, *Corporate Taxation in the Global Economy*, PIIE, Washington, D.C. (March 2019)

Panelist, *Eyes on the Horizon, What will Follow the TCJA?* Federal Bar Ass'n Tax Section Annual Meeting, Washington, D.C. (March 2019)

Panelist, *Global Response to the TCJA*, IFA USA Annual Meeting, Washington, D.C. (February 2019)

Panelist, *The Evolving Boundaries of Tax*, TCPI, Washington, D.C. (February 2019)

Presenter, *U.S. Tax Reform: A Multilateral Success?* International Tax Cooperation: The Challenges and Opportunities of Multilateralism, Oxford Center for Business Taxation, UK (December 2018)

Panelist, multiple panels on U.S Tax Reform and Digital Taxation, International Taxation Conference, Foundation for International Taxation, Mumbai, India (December 2018)

Keynote Speaker, *US Tax Reform, How Did We Get Here?* The Future of the Corporate Tax, Tallinn, Estonia (September 2018)

Invited Participant, *KPMG Roundtable on Taxation of the Digital Economy*, Paris, France (July 2018)

Speaker, *U.S. Views on Taxation of the Digital Economy*, Oxford University Said School of Business Summer Conference (July 2018)

Discussant, Dan Shaviro, *The New Non-Territorial U.S. International Tax System*, Oxford University Said School of Business Academic Symposium (July 2018)

Speaker, *U.S. Views on the Digital Economy*, U.S.-China Tax Seminar, Shanghai (June 2018)

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Speaker, Sweden IFA: *US Tax Reform: Worth Waiting 30 Years For?* Stockholm (May 2018)

Presenter, *Taxing Digital Across an Atlantic Divide*, University of Florida Levin College of Law Faculty Workshop (with Georg Kofler) (March 2018)

Speaker, Webcast on *Tax Cuts & Jobs Act, International Provisions*, Florida Bar Tax Section (January 2018)

Panelist, IFA Miami, *International Tax Reform* (December 2017)

Panelist, Foundation for International Taxation, Mumbai, *Perspectives on the Multilateral Instrument* (December 2017)

Panel Co-Chair, International Bar Association, Buenos Aires, *Recent Developments in Treaty Anti-Avoidance Rules* (November 2017)

Lecturer, *A New Direction in U.S. International Tax Policy*, Bar Ilan University School of Law, Ramat Gan, Israel (November 2017)

Lecturer, *A New Direction in US International Tax Policy*, East China University of Political Science and Law, Shanghai, China (November 2017)

Lecturer, *A New Direction in US International Tax Policy*, Shanghai Jiaotong (Koguan) School of Law, Shanghai, China, (November 2017)

Panelist, *U.S. Tax Reform*, Tax Analysts Panel, IFA Annual Congress, Rio de Janeiro, Brazil (August 2017)

Presenter, *The Case Against BEPS: Lessons for Tax Coordination* International Tax Policy Forum, Washington, D.C. (June 2017)

Panelist, *U.S. Tax Implications for Multinationals from Brexit*, ABA Tax Section Spring Meeting (May 2017)

Presenter, *The Case Against BEPS: Lessons for Tax Coordination*, NYU Law School, (April 2017)

Presenter, IFA Westchester Branch, *BEPS: The Alternative Reality* (April 2017)

Presenter, *The U.S. in Post-BEPS World*, American Chamber of Commerce Luxembourg (March 2016)

Panelist, American Chamber of Commerce Luxembourg (March 2016)

Presenter, *The Limits of Tax Coordination*, University of Florida Levin College of Law Tax Colloquium (February 2016)

Panelist, *Global Tax Reset*, Plenary at Deloitte International Tax Conference at Villanova University (November 2015)

Panelist, *Base Erosion and Profit Shifting and International Tax Reform* at American Tax Association Mid-Year Meeting (February 2015)

Panelist, *Global Tax and Treasury Strategy Capturing, Communicating and Retaining Value in a Fast-Changing World* at Deloitte International Tax Conference at Villanova University (November 2014)

Panelist, *Selected BEPS Issues*, University of Florida Levin College of Law International Tax Symposium (October 2014)

BEPS Going Final -- the OECD moves towards final deliverables on Country by Country Reporting, Hybrids, and Treaty Abuse, IFA USA Westchester Branch (May 2014)

OTHER

Organized and Hosted: U.S. Tax Course, Miami, July 2018 (one-week course for practitioners from overseas).

Organized and Hosted: First U.S.-China Tax Seminar, Shanghai, June 2018 (together with East China University of Political Science & Law)

- Conference of 50 attendees including from US, China, HK, and Israel, including academics, students, corporate tax directors, and practitioners from law firms and accounting firms

Visiting Lecturer, Central University of Finance & Economics, Beijing, June 2018

Noted: Robert Green, Notable International Tax Articles of 2017 (for *The Case Against BEPS: Lessons for Tax Coordination*, 21 FL. TAX. L. REV. 1 (2017)), 159 TAX NOTES 1325 (May 28, 2018)

Quoted in: Richard Rubin, *U.S. Tax Revamp Weakens Case for Companies to Shift Profit Overseas*, Wall St. J. (Apr. 29, 2018)

Co-Chair, International Tax Section, Federal Bar Ass'n Tax Section Annual Meeting, Washington DC (March 2018)

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Co-Chair, University of Florida, International Programs & Comparative Law Admissions
(Aug. 2018-May 2019)

Committee Member, LLM and SJD Committee, University of Florida, Admissions (Aug.
2018-May 2019)

BAR ADMISSIONS

New York (1997)