



## **TAX COLLOQUIUM PRESENTER BIOGRAPHIES (IN ORDER OF APPEARANCE)**

### **J. RICHARD (RICK) STAMM**

J. Richard (Rick) Stamm is PricewaterhouseCoopers' U.S. Tax Leader. Mr. Stamm is also a member of the U.S. Firm's Leadership Team and PricewaterhouseCoopers' Global Tax Leadership Team.

Mr. Stamm's background is broad-based, having served a wide range of companies including large inbound and outbound multinationals, large domestic companies, as well as family-owned businesses. Rick's clients have been in a number of industries, including chemicals, pharmaceuticals, mining, general industrial products, aerospace, real estate, insurance, investment management and public utilities. Areas of technical emphasis during his career have included mergers and acquisitions, inventories, accounting methods, inbound investment matters, and consolidated returns. His management roles have included leading the Philadelphia Office Tax practice, national leadership of an industry Tax practice, and various roles in U.S. Firm Tax Leadership prior to becoming the U.S. Tax Leader.

Mr. Stamm joined the Firm in 1976 in the Baltimore Assurance practice. In 1981, he transferred to the Tax practice. He spent a year in PwC's Washington National Tax Services office in 1983-1984. Rick was admitted to the partnership in 1986 in Baltimore and then transferred to Philadelphia in 1988. He is a C.P.A. and earned his B.A. in Accounting, Summa Cum Laude, from Lycoming College in Pennsylvania (1976).

### **GEORGE FORSTER**

George Forster is a Tax Partner with PricewaterhouseCoopers LLP. Upon rejoining the firm on August 1, he joined the Tax Core Leadership team and is currently focusing on the tax client service delivery model as well as tax partner development to fit that model. Prior to rejoining PwC, George was the Vice President - Taxes and Assistant Treasurer of IBM Corporation and a member of the Company's Senior Leadership Team. In this role, he was responsible for IBM's global tax and intercompany operations. During his tenure at IBM, he was also actively involved with the FASB on FIN 48 and other tax accounting topics.

Prior to joining IBM on July 1, 2001, George was an engagement tax partner in the PricewaterhouseCoopers (PwC) New York Technology Industry Group. He joined the Firm in 1979 and was admitted to the partnership in 1989. In his PwC capacity, George was principally responsible for the delivery of proactive tax planning advice and other tax-related advisory services to several large multinational companies; including the coordination and delivery of worldwide tax service to IBM since 1987.

George is a member of the American Institute of Certified Public Accountants and the New York State Society of Certified Public Accountants. He received a B.A. degree in mathematics and economics from Ohio Wesleyan University in 1977 and a M.S. degree in accounting from Northeastern University - Graduate School of Professional Accounting in 1979.

## **MICHAEL GRAETZ**

Michael J. Graetz is the Justus S. Hotchkiss Professor of Law at Yale University. Before becoming a professor at Yale in 1983, he was a professor of law at the University of Virginia and the University of Southern California law schools and Professor of Law and Social Sciences at the California Institute of Technology. His publications on the subject of Federal taxation include a leading law school text and more than 60 articles on a wide range of tax, international taxation, health policy, and social insurance issues in books and scholarly journals. His most recent book is *100 Million Unnecessary Returns: A Simple Fair and Competitive Tax Plan for the United States*, published in January 2008 by Yale University Press. His previous books include *Death by a Thousand Cuts: The Fight over Taxing Inherited Wealth* published by Princeton University Press; *True Security: Rethinking Social Insurance* (Yale University Press, 1999); and *The U.S. Income Tax: What It Is, How It Got That Way and Where We Go From Here*, (W. W. Norton & Co, 1999) (a paperback edition of the book originally published as *The Decline (and Fall?) of the Income Tax*) and *Foundations of International Income Taxation* (Foundation Press, 2003);). He is also the author of a leading law school coursebook, *Federal Income Taxation: Principles and Policies*. His most recent articles are "Income Tax Discrimination and the Political and Economic Integration of Europe" (115 Yale Law Journal 1186, 2006) and Dividend Taxation in Europe: When the ECJ makes Tax Policy, (44 Common Market Law Review, 1577, 2007).

During January-June 1992, Michael Graetz served as Assistant to the Secretary and Special Counsel at the Treasury Department. In 1990 and 1991, he served as Treasury Deputy Assistant Secretary for Tax Policy. Professor Graetz has been a John Simon Guggenheim Memorial Fellow and he received an award from Esquire Magazine for courses and work in connection with provision of shelter for the homeless. He served on the Commissioner's Advisory Group of the Internal Revenue Service. He served in the Treasury Department in the Office of Tax Legislative Counsel during 1969-1972. He is a fellow of the American Academy of Arts and Sciences.

Michael Graetz is a graduate of Emory University (B.B.A. 1966) and the University of Virginia Law School (J.D. 1969). A native of Atlanta, Georgia, He is married to Brett Dignam and has five children.

## **DR. PETER MERRILL**

Dr. Peter Merrill is Director of the National Economic Consulting Group in the Washington National Tax Services office of PricewaterhouseCoopers LLP and is a Principal in the firm. Prior to joining the firm in 1989, he was Chief Economist of the Joint Committee on Taxation of the U.S. Congress. Dr. Merrill also has lectured at Harvard College.

The National Economic Consulting Group provides revenue and budget estimates, financial and economic impact analyses, health policy economics, and statistical services to corporations, trade associations, and government clients (see [www.pwc.com/nec](http://www.pwc.com/nec)).

Dr. Merrill has significant experience in international taxation and tax policy. He has advised the governments of Poland, the former Yugoslavia, the former Soviet Union, Bulgaria, and Russia on the reform and enactment of income and value-added taxes. More recently he advised the Governments of Puerto Rico and the U.S. Virgin Islands on U.S. tax policies affecting the possessions.

Dr. Merrill received his Ph.D. in Business Economics from Harvard University in 1982 and his B.A. in Applied Mathematics, *summa cum laude*, from Harvard College in 1977. He is a member of the American Economics Association, the National Tax Association, and the International Fiscal Association.

Dr. Merrill is co-author of three books and has written numerous articles. He frequently speaks on tax policy matters and has been invited to testify before the tax-writing and budget committees of the U.S. Congress, the National Commission on Economic Growth and Tax Reform, the Advisory Commission on Electronic Commerce, and Treasury Secretary Paulson's recent conference on business taxation and global competitiveness.

## **MICHAEL FEDER**

Michael Feder is a principal in the tax practice in the New York office of PricewaterhouseCoopers LLP. Michael's practice focuses on advising U.S. and non-U.S. multinational companies on international and financial transactions tax planning issues. From 1999 to 2006, Michael was a member of PwC's Washington National Tax office.

Michael joined PricewaterhouseCoopers after having practiced international tax law with Coudert Brothers in New York City. Michael was previously an adjunct professor of international tax law at Georgetown University and is the author of numerous publications on financial instruments and transactions, including *Federal Income Taxation of Securities Lending Transactions*, 3 *Journal of Taxation of Financial Products* 11 (Winter 2002), *Taxability of Securities Transfers in U.S. Repo Transactions*, 1 *BNA International Tax Planning International: financing* No. 2 (November 2001), *IRS Takes a Fresh Look at Cross-Border Tax Planning*, 3 *Derivatives Report* (April 2002) (Warren, Gorham & Lamont/RIA), *U.S. Treasury Regulations Have Important Subpart F Consequences for CFC Derivatives Dealers*, 2002 T.N.I. 1099 (June 3, 2002) and *Making CFC Hedging Work: Avoiding Whipsaw In An Ambiguous Environment*, 4 *Journal of Taxation of Financial Products* No. 1 (Winter 2003).

Michael speaks and reads Mandarin Chinese. He received a B.A. from the University of Michigan at Ann Arbor and a J.D. from Harvard Law School.

## **REBECCA LEE**

Rebecca Lee is a Director in PricewaterhouseCoopers' International Tax Services Group in the Washington National Tax Services office. 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-boarder 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 the College of William and Mary in International Relations and Economics (Double Concentration), a J.D. magna cum laude from Tulane Law School and an LLM in Taxation with distinction from Georgetown University Law Center. Rebecca is a member of the Virginia Bar and the District of Columbia Bar.

### **RICHARD (DICK) HARVEY**

J. Richard (Dick) Harvey has over 30 years of multifaceted experience including (i) corporate and individual taxation; (ii) domestic and international taxation; (iii) US Treasury Department, Office of Tax Policy, and (iv) financial accounting with specific emphasis on FIN 48 and IFRS.

In his current role at PwC, Dick provides CEOs, CFOs, and Tax Directors with guidance and counsel regarding the leading tax and accounting issues of the day. Dick is also a nationally recognized expert in the financial accounting for income taxes (e.g., FAS 109, FIN 48, and IFRS). He was consulted by the FASB upon development of FIN 48, and is currently spending substantial effort on how the likely conversion from US GAAP to IFRS will impact US corporate taxpayers. In addition, Dick is also consulted frequently by clients on tax issues surrounding LILLO/SILOs; attorney client/work product; corporate tax shelters; mark-to-market issues; and many other technical tax issues.

Dick served as an adjunct accounting professor at The College of New Jersey (2005 through 2007) and at Bucknell University (2007), where he is currently the Distinguished Clinical Professor of Accounting and Executive-in-Residence. In his role as a professor, Dick teaches both accounting and tax courses. Aside from the enjoyment of helping others learn, these courses help Dick stay current on a wide variety of tax and accounting issues he would not otherwise regularly encounter, e.g., individual taxes.

Dick first joined Price Waterhouse (PW) Philadelphia in 1978 in the audit practice. After being promoted to Acting Manager, he transferred to the tax practice. From 1985 to 1986, he was assigned to PW's Washington National Tax Office where he was responsible for coordinating with the IRS National Office and the US Treasury Department Office of Tax Policy.

In 1986, Dick joined the U.S. Treasury Department, Office of Tax Policy. As the Senior Accountant, he participated extensively in the formulation of the U.S. Treasury Department's tax policy, and the drafting of legislation and regulations, including extensive work on the 1986 Tax Reform Act. He also worked closely with senior U.S. Treasury Officials, as well as senior Congressional Staff. His areas of responsibility included: the taxation of financial institutions including banks and insurance companies; tax accounting matters; and the corporate alternative minimum tax. Dick re-joined PW in 1988 as a Tax Partner in NYC. He has served as the U.S. Banking and Capital Markets Tax Leader since 1997.

Dick has a BSBA, *Magna Cum Laude*, from Bucknell University and a MSc in International Economics and Finance from the University of York, UK. He is a frequent speaker on tax and accounting issues of interest to U.S. and foreign financial institutions. In his spare time, he plays competitive baseball at the national level.

### **KEN KYUKENDALL**

Ken Kuykendall is a Partner with the Industry Services Group tax practice of PricewaterhouseCoopers in Chicago and one of PwC's thought leaders in the area of accounting for income taxes.

Ken has over 15 years of experience in taxes including extensive experience in SFAS 109 and IAS 12 as well as the related US GAAP and IFRS rules. Ken also has significant experience in tax accounting for international operations of US multinational corporations, including branch operations, cross-border transactions and foreign currency transactions. Additionally, Ken is the national leader of PwC's tax IFRS efforts, as well as the leader of our Tax Accounting Services and Tax Function Effectiveness solutions in the Midwest. Ken is a frequent speaker on these topics in many public forums including Tax Executives Institute (TEI), Council for International Tax Education (CITE) and the Chicago Tax Club.

Ken earned a B.A. in accounting from Eastern Illinois University, a Masters in Taxation from DePaul University, and a J.D. from The John Marshall Law School in Chicago. Ken is a member of the American Institute of Certified Public Accountants, the American Bar Association, and he is a licensed CPA and attorney in the State of Illinois.

## **LINDY PAULL**

Lindy L. Paull is a managing partner of PricewaterhouseCoopers' Washington National Tax Services (WNTS), where she is the leader of the Legislative and Regulatory client services practice. PricewaterhouseCoopers' WNTS group is the preeminent national tax practice in Washington, D.C., with over 300 professionals serving large multinational clients in numerous technical areas of tax law. Ms. Paull represents major corporations, trade associations, and business coalitions before Congress, the Department of the Treasury, and the Internal Revenue Service.

Ms. Paull had a distinguished career in federal government for almost two decades and is well recognized in federal tax policy matters. She served as Chief of Staff of the U.S. Congressional Joint Committee on Taxation for 5 years (1998-2003) and in several senior staff positions (including Republican Staff Director and Chief Counsel) with the U.S. Senate Committee on Finance for the previous 12 years (1986-1998). Ms. Paull worked on most, if not all, tax legislation considered by the U.S. Congress over her 17-year career with the Congress. During her tenure as Chief of Staff of the Joint Committee on Taxation, Ms. Paull spearheaded important reports on Enron, tax simplification, interest and tax penalties (including tax shelter penalties), individual expatriation, disclosure of tax return information, and audits of tax-exempt organizations. Ms. Paull also served as attorney-advisor to U.S. Tax Court Judge Herbert L. Chabot for two years. Early in her career, Ms. Paull practiced tax law with a major law firm in Washington, D.C., and as a CPA in the tax practice of a major accounting firm in Miami, FL.

Ms. Paull has testified before Congress on numerous occasions and is a frequent speaker on federal tax legislation and policy. She taught a graduate course in federal tax policy at Georgetown University Law Center for ten years.

Ms. Paull is active in a number of business and professional associations, including the American Bar Association (Vice Chair, Government Relations Committee), American Tax Policy Institute, European-American Business Council (Board member), Federal Bar Association, National Foreign Trade Council (Board member), The Tax Coalition, The Tax Council (Board member) and University of Florida Law Center Association (Board member). Ms. Paull is a member of the District of Columbia and Florida bars.

Ms. Paull received her law degree (J.D. 1979, with honors) and Masters of Law in Taxation (LL.M.1980) from the University of Florida College of Law. Ms. Paull received a Bachelors of Business Administration (B.B.A.), majoring in accounting, from Florida International University in 1974.

## **DONALD R. (DON) LONGANO**

Donald R. (Don) Longano, former Chief Tax Counsel to the House Ways and Means Committee, is a principal in the PricewaterhouseCoopers LLP Washington National Tax Services office. Mr. Longano is responsible for analyzing federal tax legislative and regulatory developments for many of the firm's clients.

Prior to joining the legacy firm Price Waterhouse LLP in January 1995, Mr. Longano spent nearly ten years on the staff of the Committee on Ways and Means of the United States House of Representatives. From 1993 to 1995, in his most recent position as Chief Tax Counsel, he advised Democratic Members of the Committee on all federal taxation issues; coordinated tax policy development and production of legislation within the Committee; and participated in drafting legislation and Committee reports.

From 1985 to 1993, Mr. Longano was responsible for a wide range of substantive tax issues for the Committee staff, including international, corporate, partnership and insurance taxation. He was also extensively involved in the Tax Reform Act of 1986 and all subsequent revenue measures through the 103rd Congress.

Mr. Longano earned his LL.M. in taxation from the New York University School of Law (1982); his J.D. from the Georgetown University Law Center (1979); and his A.B. in Economics from the University of Notre Dame (1976).

## **MARY ANN CLOYD**

Mary Ann has over 29 years of tax and business consulting experience serving multinational corporate clients in a variety of industries. She is the partner in charge of PwC's Los Angeles tax practice. She also currently serves on PwC's U.S. Board of Director and just completed a term on PwC's Global Board of Partners.

Mary Ann is a licensed CPA in California and Texas. She is also a member of the American Institute of Certified Public Accountants. Mary Ann serves on the Advisory Board at Baylor University's Hankamer School of Business and at USC's Leventhal School of Accounting. She is President of PricewaterhouseCoopers's Education and Recruiting Foundation and serves on the Board of Directors of PwC's People Who Care Fund. Mary Ann earned her B.B.A. in Accounting, *summa cum laude*, from Baylor University.

## **WOODROW (WOODY) ANDERSON**

Woody is an Assurance Partner in the Consumer and Industrial Products practice based in the Los Angeles office. He has been with PricewaterhouseCoopers for over 12 years. Prior to coming to Los Angeles, Woody served on an international assignment where he assisted companies in Switzerland and Germany in achieving their initial listing on the New York Stock Exchange, including application of IFRS, reconciliation to US GAAP, and working through challenging registration matters with the US Securities & Exchange Commission. While on assignment, Woody served as the lead assurance senior manager and then as a divisional lead partner for Novartis, the world's fifth largest pharmaceutical company. Novartis is the only European company to have complied with Section 404 of the Sarbanes-Oxley Act beginning in 2004. Prior to his rotation in Europe, Woody worked in the Detroit office where he served numerous automotive supply companies including, among others, Honeywell, United Technologies, and MascoTech.

In addition to his experience with PwC, Woody worked as a plant controller for a manufacturing

operation with \$180 million in revenue in the automotive and materials handling industries, the parent company of which was also registered with the SEC.

Woody continues to serve Novartis as the lead partner for its California-based Vaccines & Diagnostic Division as well as other SEC listed multi-national manufacturing companies based in California. He has also served the following clients: Bayer (Leverkusen, Germany), Ducommun (Los Angeles, CA), Gate Gourmet (Zurich, Switzerland), Honeywell (Detroit, MI), MascoTech (Detroit, MI), Novartis (Basel, Switzerland and Emeryville, CA), Syngenta (Basel, Switzerland), United Technologies (Detroit, MI), Watson Pharmaceuticals (Los Angeles, CA).

Woody has authored several published works, which include *IFRS Issues and Solutions for the Pharmaceuticals Industry, Vol. 1 & 2* and *Revenue Recognition Disclosures in the Pharmaceuticals Industry*. He is a member of the American Institute of Certified Public Accountants, California Society of Certified Public Accountants and Michigan Association of Certified Public Accountants

Woody earned a Bachelor of Business Administration degree from the University of Michigan at Ann Arbor.

## **FRAN AYERS**

Frances Ayres' teaching interests are in the areas of financial accounting, financial accounting theory, economics of accounting choice, and the interaction between tax and financial reporting. She has published in the *Journal of Accounting and Economics*, *Journal of Accounting Research*, *The Accounting Review* and other academic and professional journals. She serves as an ad hoc reviewer for several journals and has served on the editorial boards of *The Accounting Review* and *Journal of Accounting and Public Policy*. She is past editor of the *Journal of the American Taxation Association*. She is an associate editor (tax) for *Accounting Horizons*. Her research interests focus on the impact of taxation and financial information and disclosure on managers and investors. She is currently working on papers stemming from a research project funded by PWC that examines the differences in firms' level of disclosure regarding LIFO reporting as well as the impact of LIFO on financial reports. She has been director of the Steed School of Accounting in the Price College since 1994. She earned her PhD from the University of Iowa.

## **JERRY TRAPNELL**

Jerry Trapnell is Executive Vice President and Chief Accreditation Officer for AACSB International, the Association to Advance Collegiate Schools of Business. He assumed this position August 2, 2004. Prior to his current position, he served as dean of the College of Business and Behavioral Science at Clemson University, a position he held since 1993. He served as the 2002-03 chair of the Board of Directors of AACSB International and served on the AACSB Board from 1999 through 2004. Prior to becoming Dean at Clemson, he served as director and professor of the Clemson University School of Accountancy. He joined the Clemson accounting program in 1986 after serving on the faculty of the department of accounting at Louisiana State University-Baton Rouge for 10 years. At LSU, he was also assistant dean for undergraduate studies in the College of Business. He earned his Ph.D. from the University of Georgia in 1977, his B.S. and M.S. from Clemson University in 1968 and 1970, respectively.

A CPA in Louisiana, he serves or has served on committees and boards of directors of the American Institute of Certified Public Accountants, Accounting Programs Leadership Group (including serving as president) of the American Accounting Association, Federation of Schools of Accountancy, Institute of Management Accountants, AACSB International, Southern Business Administration Association (SBAA) and the South Carolina Association of CPAs (SCACPA). He is

a past president of the SBAA. He received two teaching awards at LSU and was recognized as the 1987 Outstanding Alumnus by the Clemson Chapter of Beta Alpha Psi, the national honorary and professional accounting fraternity. In 1983 he was recognized by Beta Alpha Psi as one of the top faculty advisors in the country. He received the Award of Excellence from the Louisiana Society of CPA's for earning the highest score in the state on the May 1978 CPA examination. He has published articles in a variety of professional and academic journals including Management Accounting, The Internal Auditor, Contemporary Accounting Research, Advances in Accounting, Journal of Accounting, Auditing, and Finance, Managerial Planning, Journal of Financial Research, National Public Accountant, and Business and Economic Review. He has presented programs at a variety of professional organizations at the local and national level including the Southern Business Administration Association, AACSB International, the South Carolina Association of CPAs, Institute of Management Accountants, Federation of Schools of Accountancy, and the American Accounting Association. He has served on the board of directors of three companies and is active in a variety of civic and local community activities.

### **TERRY WARFIELD**

Professor Warfield received a B.S. and M.B.A. from Indiana University and a Ph.D. from the University of Iowa. Professor Warfield's area of expertise is financial accounting. Prior to his academic career, Professor Warfield worked for five years in the banking industry and from 1995-1996 he served as the Academic Accounting Fellow in the Office of the Chief Accountant at the U.S. Securities and Exchange Commission in Washington D.C. While on the Staff, he worked on projects related to financial instruments, financial institutions, and helped coordinate a symposium on intangible asset financial reporting.

Professor Warfield's primary research interests concern financial accounting standards and disclosure policies, including the effects of accounting information and disclosures on securities markets. He has published articles in various scholarly and practice oriented outlets. He has served on the editorial board of *The Accounting Review*, *Accounting Horizons*, and *Issues in Accounting Education* and he has served as a reviewer for many other accounting and business journals. He has served the American Accounting Association on the Financial Accounting Standards Committee (Chair 1995-1996), on the Association Council, Nominations Committee, President of the Financial Accounting and Reporting Section (2004-2006), and Chair of the Regulations Committee (2007-2008). Professor Warfield is one of three academic members of FASAC, the advisory council to the Financial Accounting Standards Board.

Professor Warfield teaches intermediate and masters level courses in financial reporting and he has served on numerous PhD dissertation committees (nine as the Chair). He has received teaching awards at both the University of Iowa and the University of Wisconsin and he has developed several case studies based on his research for use in accounting classes. These cases and related instructional articles have been published in *Issues in Accounting Education* and the AICPA Professor-Practitioner Case Development Program. Professor Warfield is co-author (with D. Kieso and J. Weygandt) of *Intermediate Accounting*, (12<sup>th</sup> Edition) and *Intermediate Accounting: Principles and Analysis* (2<sup>nd</sup> Edition).

### **ROBERT MORITZ**

Robert (Bob) Moritz currently leads the Firm's Assurance Services Practice, providing clients expert assistance as they address their audit, assurance and accounting needs in a rapidly changing and increasingly complex business environment.

Prior to this role, Mr. Moritz served as the managing partner of the New York office and the Metro



Region. He also led the Financial Services Audit and Business Advisory practice for PricewaterhouseCoopers across the U.S., covering Banking, Capital Markets, Insurance, Investment Management and Real Estate.

From 1991 to 1993, Mr. Moritz served a three-year tour in PricewaterhouseCoopers -Tokyo where he provided audit and advisory services to numerous European and US financial services organizations.

Mr. Moritz joined PricewaterhouseCoopers in 1985 after completing his B.S. in Accounting at SUNY-Oswego. He was admitted into the partnership in 1995.