



Speaker Biographies

**Elizabeth (Liz) Askey**

Deputy Chief, IRS Independent Office of Appeals

Session:*Fireside Chat (without the fire) with Elizabeth Askey*

Elizabeth (Liz) Askey is the Deputy Chief in the Independent Office of Appeals (Appeals). In this role, she assists the Chief of Appeals in providing leadership and direction over nationwide programs designed to fairly and impartially resolve tax controversies without litigation on behalf of the federal government and taxpayers. From 2019-2022, Liz served as the Deputy Division Counsel (International) for the Large Business and International (LB&I) Division, where she worked with the Division Counsel to manage LB&I attorneys and paralegals located throughout the country responsible for litigating LB&I cases and providing advice to exam teams and Appeals. She also provided advisory services on all international program matters under LB&I's jurisdiction. Prior to 2019, Liz spent nearly 30 years as a tax controversy and policy practitioner at several law and accounting firms and in private industry, with a particular emphasis on resolving administrative controversies in examinations and at Appeals. She also served as an Associate Tax Legislative Counsel in the Office of Tax Policy at the Treasury Department. Liz received her J.D., *cum laude*, from Harvard Law School and A.B., *magna cum laude*, from Bryn Mawr College.

**Sarah Burnham**

Senior Director, Tax, Raytheon Technologies

Session:*Tax Executives Forum*

Sarah Burnham is a senior director in the tax department of RTX (formerly Raytheon Technologies). In this role, she oversees tax planning and business support for the Pratt & Whitney and Raytheon business units, as well as certain corporate-level initiatives. Sarah previously held roles in tax controversy at both RTX and a consumer goods company. She started her career as an associate at Covington & Burling.

**Alees Marti**

Senior Manager, Domestic Tax Planning, Starbucks Corporation

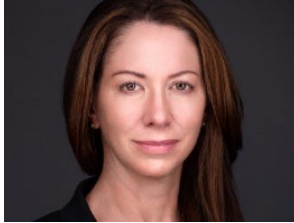
Session:*Tax Executives Forum*

Alees Marti is a senior manager of domestic tax planning and controversy at Starbucks. With over 18 years of tax industry experience in both public accounting and the retail industry, Alees' experience has spanned issues of income tax compliance, operations, U.S. domestic income tax & employment tax planning as well as IRS controversy with a focus on navigating the complexities of the ever-changing tax landscape to evaluate impact and bring value to business initiatives and priorities. Currently, Alees is leading a multi-year IRS income tax examination with a focus on Transfer Pricing & TCJA cross-border issues as well as an IRS employment tax examination with a focus on fringe benefits.

COVINGTON

Eighth Retreat for Tax Executives

WEDNESDAY, NOVEMBER 8, 2023 | NEW YORK, NY



Stacey McGrath

Vice President, Tax, Silgan Holdings

Session:

Tax Executives Forum

Stacey McGrath is the VP Tax at Silgan Holdings Inc., a U.S. public multinational in the consumer packaging industry. Stacey has extensive experience in M&A, international tax as well as transfer pricing and related tax controversy. Stacey's work experience includes consulting at Big 4 as well as in-house senior tax positions at GE Capital and RTX (fka United Technologies Corporation).



Kanthimathi (Kanthi) Morrissey

Vice President - Tax, IBM

Session:

Tax Executives Forum

Kanthi's professional background is rooted in IBM and specifically the tax department of IBM. She joined IBM in February 2004 in Bangalore, India and had a long and scenic route to the headquarters location in Armonk, NY. As the VP - Tax, she leads a team of high performing tax professionals to manage all tax matters for IBM globally. She is passionate about running a best-in-class tax function that embraces technology and supports the growth and success of IBM. Her team is dedicated to providing exceptional tax support on a daily basis to each of IBM's business units and all customers both internal and external. She and her team are very focused on tax legislative and policy matters around the world. Prior to joining IBM, Kanthi spent three years in the tax services division of PricewaterhouseCoopers, Bangalore, India. Kanthi has her undergraduate degree in business and accounting from Bangalore University, is a member of the Institute of Chartered Accountants of India and has a Master of Science in Taxation from Fordham University, NY. On the personal front, she lives in Pound Ridge, NY with her husband and their six-year-old daughter who keeps them on their toes.



Casey Murphy-Gerry

Vice President, Global MedTech Tax Planning, Johnson & Johnson

Session:

Tax Executives Forum

Casey Murphy-Gerry is Vice President, Global MedTech Tax Planning at Johnson & Johnson corporate headquarters in New Brunswick, N.J. She previously served as Senior Director, Global MedTech Tax Planning and also Associate Tax Counsel, focusing on international tax planning for MedTech, as well as mergers, acquisitions, divestitures and licensing transactions. Prior to joining Johnson & Johnson in 2016, Casey was a tax attorney at Macquarie Bank in New York City focusing on mergers and acquisitions, oil and gas, public private partnerships, and securities. She started her career in KMPG's International Corporate Services in New York City focusing on various international tax issues for a variety of industries. Casey received a Juris Doctor at Villanova School of Law and LLM in taxation at New York University School of Law. She received a Bachelor of Science in Business Administration degree with a concentration in Accounting from the Colorado State University.



Sean Akins

Tax Partner, Covington & Burling
Washington

Sessions:

Fireside Chat (without the fire) with Elizabeth Askey
“Moore” Tax Controversy (Moderator)

For over a decade, Sean Akins has advised corporations, partnerships, international organizations and tax-exempt entities on Federal tax litigation and controversy matters. Sean has extensive experience litigating before the U.S. Tax Court, Court of Federal Claims, and the U.S. District and Appellate Courts. Sean is co-author of Kafka, Cavanagh, & Akins, *Litigation of Federal Civil Tax Controversies*, 2d ed., the leading two-volume treatise on the litigation of tax cases in the United States. In addition to litigating tax matters, Sean also provides strategic advice with respect to navigating the Internal Revenue Service administratively. This involves representing clients before the IRS Office of Appeals, in Fast Track proceedings, in connection with standard and CAP-based audits, and in the obtaining of private rulings from the IRS on substantive issues. Sean also assists clients in responding to Congressional and other administrative tax investigations. Sean has been recognized as a leading tax practitioner in Washington D.C. by *Chambers and Partners*, a leading tax litigator Nationwide by *Chambers and Partners*, a leading tax lawyer by *Legal500*, and a “Rising Star” in tax. Sean has been elected as a Fellow of the American Bar Foundation and received the American Bar Association Tax Section’s Nolan Fellowship. Sean received his J.D., *magna cum laude*, from Cornell Law School, where he was elected Order of the Coif and the Admissions Editor for the *Cornell Law Review*. He received his B.A., *cum laude*, from The George Washington University.



Daniel Luchsinger

Tax Partner, Covington & Burling
Washington

Session:

Tax Executives Forum

Dan Luchsinger co-chairs the firm's Tax Practice Group. He practices in a broad range of federal income tax issues, including the structuring of partnerships and joint ventures; domestic and cross-border acquisitions and dispositions, including both inbound and outbound property and stock transfers; and cross-border restructurings seeking sustainable tax attribute utilization and effective tax rate minimization. Dan regularly oversees multi-jurisdictional acquisitions and restructurings, drawing on a network of advisors of the highest caliber from around the world. Dan advises both U.S. and Non-U.S. clients in a number of industries ranging from consumer products to heavy manufacturing, including companies operating through tax advantaged vehicles. For almost a decade, Dan taught Taxation of Partnerships at the Georgetown University Law Center and speaks regularly on a variety of federal income tax topics. Dan received his J.D., *magna cum laude*, from Georgetown University Law Center, where he was on the *Georgetown Law Journal* and elected Order of the Coif. He received his B.S., *summa cum laude*, from the University of Minnesota, where he was elected Phi Beta Kappa.



Mark Mosier

Appellate Partner, Covington & Burling
Washington

Session:
“Moore” Tax Controversy

Mark Mosier co-chairs Covington’s Appellate and Supreme Court Litigation Group. A former law clerk to Chief Justices William Rehnquist and John Roberts, Mark has represented clients in more than 60 cases before the U.S. Supreme Court. Mark argued and won *U.S. ex rel. Polansky v. Executive Health Resources*, an important False Claims Act case the Court decided last term. Mark has represented clients in many of the highest profile cases before the Court in recent terms, including the travel ban, same-sex marriage, the Affordable Care Act, partisan gerrymandering, and legislative prayer cases. Mark also frequently represents clients in federal and state courts of appeals. These appeals have involved a wide range of legal issues. He also advises clients on litigation strategy before the case reaches the appellate stage. He works closely with the trial team to ensure that issues are properly presented and preserved for appeal and, when necessary, to develop novel legal arguments that can help shape unsettled areas of law. Mark is also a co-founder of the ChadTough Defeat DIPG Foundation. This non-profit organization was started after his six-year-old son, Michael, passed away from DIPG, the deadliest form of childhood brain cancer. Since its founding in 2015, the foundation has funded more than \$20 million for DIPG research. Mark received his J.D., with honors, from The University of Chicago Law School, where he was the Comment Editor of the *University of Chicago Law Review*, and A.B., with honors, from The University of Chicago.



Kevin Otero

Tax Partner, Covington & Burling
New York

Session:
Controversy Case Studies

Kevin Otero advises and represents multinational corporations, financial institutions, and individuals in all aspects of federal and state tax controversy, including audits, investigations, administrative appeals, and tax litigation. Kevin has led the successful defense of some of the most complex multi-year and multi-issue tax audits in the country and has represented clients in every facet of tax controversy from examinations and IRS Appeals through judicial proceedings. His experience covers an array of international and domestic tax issues, including transfer pricing, financial products, foreign tax credits, renewable energy incentives, complex corporate restructurings, bad debt and worthless stock, tax-free dispositions, valuation disputes, and privilege issues in the tax context. He also represents clients in tax-related internal investigations and civil and criminal tax investigations. Clients across industries benefit from Kevin’s extensive experience negotiating with tax authorities at various levels and his record of success in resolving controversies at various procedural stages, including alternative dispute forums. Kevin speaks regularly on tax controversy topics and contributes to various leading tax publications. Kevin received his J.D. from Columbia Law School, where he was the Senior Editor of the *Columbia Law Review* and a Harlan Fiske Stone Scholar, and B.A. from Yale University, where he was a Seward Henry Fields Scholar.



Ansgar Simon

Tax Partner, Covington & Burling
New York

Session:

Developments in International Tax Planning
“Moore” Tax Controversy

Ansgar Simon has a broad-based transactional tax practice. He regularly advises on mergers and acquisitions, restructuring transactions, dispositions and the formation of corporate and partnership joint ventures, with a focus on cross-border transactions. Ansgar is a member of the executive committee of the Tax Section of the New York State Bar Association, where he co-chairs the committee on cross-border M&A. He is the editor of *Tax Planning for International Mergers, Acquisitions, Joint Ventures and Restructurings* (6th ed. 2023). Ansgar received his J.D. from Stanford Law School, where he was elected Order of the Coif, and a Ph.D. in philosophy from the University of California, Los Angeles.



Jeremy Spector

Tax Partner, Covington & Burling
Washington

Session:

Controversy Case Studies

Jeremy Spector's practice involves tax planning, IRS controversy work, and the structuring of corporate transactions, with particular emphasis on advising professional sports leagues and teams and on representing large taxpayers through the IRS audit, Fast Track, and Appeals processes. Jeremy's sports-related work encompasses such matters as the purchase and sale of sports franchises, public and private stadium financing, player compensation, the relationship between taxable and tax-exempt entities, franchise and network valuations, and the treatment of sponsorship, licensing, and broadcast agreements. He has successfully represented clients at the IRS Examination and Appeals levels and in securing rulings from the IRS National Office on all the foregoing issues, as well as on the following topics: changes in accounting methods and periods, capitalization of tangible and intangible assets, deductibility of government fines, treatment of fringe benefits, and allowability of the Section 199 deduction. Jeremy received his J.D., *magna cum laude*, from the University of Michigan Law School, where he was elected Order of the Coif and the Executive Editor of the *Michigan Law Review*. He received his B.A., with distinction in the major, from Yale University.



Dirk Suringa

Tax Partner, Covington & Burling
Washington

Session:

Developments in International Tax Planning

Dirk Suringa co-chairs the firm's Tax Practice Group. He advises clients on the Federal income tax aspects of domestic and international transactions and structures and represents clients before the Internal Revenue Service, the Treasury Department, and in the Federal courts. Dirk served as Attorney-Advisor in the Department of the Treasury's Office of International Tax Counsel from 2000 to 2003. From 1996 to 1997, he clerked for the Honorable Gerald B. Tjoflat, Chief Judge of the United States Court of Appeals for the Eleventh Circuit. Dirk is a member of the Executive Committee of the International Fiscal Association, US Branch. He is the author of numerous articles on international tax matters, including the BNA Tax Management Portfolio on the Foreign Tax Credit Limitation. Dirk received his J.D., *magna cum laude*, from Harvard Law School and his B.A. from Princeton University.



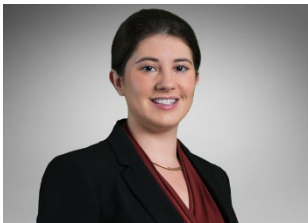
Michael Chittenden

Tax Of Counsel, Covington & Burling
Washington

Session:

“Moore” Tax Controversy

Michael Chittenden practices in the areas of tax and employee benefits with a focus employment taxes, cross-border withholding, and information reporting. He regularly advocates for clients in all stages of the administrative process with the IRS and state tax authorities relating to the proper treatment of employee remuneration and fringe benefits as well as Chapter 3 withholding failures. He has also assisted clients with complex voluntary disclosures at the federal and state levels. In addition to his controversy practice, Michael counsels companies on their backup withholding, cross-border reporting and withholding, domestic information reporting, and FATCA obligations and assists in the development of comprehensive compliance programs. He advises large employers on their employment tax obligations, including the special rules for nonqualified deferred compensation, the correction of employment tax mistakes, and the abatement of late deposit and information reporting penalties. In addition, he advises clients on the application of Form 1099-K reporting, including its application to third-party payment networks. Michael counsels clients on mobile workforce issues including state income tax withholding for mobile employees and expatriate and inpatriate taxation and reporting. Michael is a frequent commentator on information withholding, payroll taxes, and fringe benefits and regularly gives presentations on the compliance burdens for companies. Michael received his J.D., *cum laude*, from Georgetown University Law Center and B.A. from Johns Hopkins University.



Kandyce Jayasinghe

Tax Special Counsel, Covington & Burling
Washington

Sessions:

Controversy Case Studies

“Moore” Tax Controversy

Kandyce Jayasinghe is a member of the firm’s Tax Practice Group and concentrates her practice on tax controversy matters. She advocates for clients at all stages of the IRS administrative process and tax-related litigation, including discovery, motions practice, trial, and post-trial briefing in U.S. Tax Court, Federal district courts, and state courts. She also advises throughout criminal tax investigations, and guides clients through the private letter ruling submission process, internal investigations, and responding to non-party document subpoenas and other discovery requests. A co-author of *Litigating a Case in the Tax Court*, published by the ABA Tax Practitioners Guide Series, Kandyce is also actively involved in the American Bar Association and Federal Bar Association Tax Sections. She is a member of the J. Edgar Murdock American Inns of Court and was awarded the American Bar Association Tax Section’s Nolan Fellowship. Before joining Covington in 2016, Kandyce clerked at the U.S. Tax Court for two judges. She earned an LL.M. in Taxation, with distinction, from Georgetown University Law Center, a J.D., *summa cum laude*, from College of William and Mary, Marshall-Wythe School of Law, where she was elected Order of the Coif, and a B.A., *summa cum laude*, from Randolph College, where she was elected Phi Beta Kappa.

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WEDNESDAY, NOVEMBER 8, 2023 | NEW YORK, NY



Lauren Ross

Tax Special Counsel, Covington & Burling
Washington

Sessions:

Controversy Case Studies
“Moore” Tax Controversy

Lauren Ross represents clients in tax controversy matters and advises clients on international tax planning and transfer pricing issues. Lauren’s controversy experience includes representing clients during audits and administrative appeals, in litigation, and before the IRS National Office. Lauren also represents clients in Advance Pricing Agreement negotiations and in competent authority proceedings. Lauren is the co-author of the chapter on IRS Examination and Appeals in the *Practical Guide to Transfer Pricing treatise*. Lauren received her J.D., *magna cum laude*, from Duke University School of Law, where she was the Executive Editor from the *Duke Law Journal* and a Moredecai Scholar. She received her B.A., *summa cum laude*, from Vanderbilt University, where she was elected Phi Beta Kappa.



Jamin Koo

Tax Associate, Covington & Burling
New York

Session:

Developments in International Tax Planning

Jamin Koo advises clients across a broad range of tax issues, including international and domestic tax planning and acquisition and financing transactions. He works with numerous U.S. and non-U.S. clients (in particular, several Asia-based clients) on cross-border investments, joint ventures, and restructurings. His expertise includes taxation of debt instruments, derivatives, and other financial instruments, and he has been providing tax advice related to digital assets to a number of clients. Most recently, with his background in engineering and environmental science, Jamin has been advising clients in a number of industries on various issues involving tax credits and other tax provisions of the Chips & Science Act and the Inflation Reduction Act and drafting comments to Treasury and the IRS. Jamin received his J.D. from the University Pennsylvania Law School, where he was honored with the Bernard A. Chertcoff Prize for Taxation, S.M. from Massachusetts Institute of Technology, and B.S. from the University of Illinois.



Elnaz Manoucheri

Tax Associate, Covington & Burling
San Francisco

Session:

Developments in International Tax Planning

Elnaz Manoucheri advises multinational clients on the U.S. international tax aspects of their structures, operations, and transactions. Her practice focuses on tax-efficient structuring of cross-border acquisitions, dispositions, restructurings, financings, and internal reorganizations. In recent years, she has focused significantly on the 2017 TCJA, including GILTI, BEAT and the foreign credit system. Elnaz also has extensive experience on traditional international tax issues such as cross-border M&A, international restructurings, Subpart F, source of income and expense allocations. Most recently, Elnaz has advised on the recent corporate alternative minimum tax rules, given her strong foundation in accounting, her CPA qualification, and her years working at a “Big Four” accounting firm. Prior to joining the firm, Elnaz gained experience as an intern at the Office of the International Tax Counsel of the U.S. Treasury. Elnaz received her J.D. from the University of California, Berkeley, where she was honored with the Fenwick Tax Award. She received her M.S., *magna cum laude*, from the University of Notre Dame and B.S., with High Honors, from the University of California, Berkeley.



Joe Sullivan

Tax Associate, Covington & Burling
Washington

Session:

Developments in International Tax Planning

Joe Sullivan advises multinational clients on IRS audit preparation and defense, inbound and outbound international tax planning, and certain U.S. domestic tax issues, including in the areas of federal tax accounting and excise tax. Joe also advises clients on issues relating to transfer pricing and intangible asset valuation, and has particular expertise in tax policy and legislative initiatives. Joe has been actively involved in the OECD’s Pillar Two project, and is a frequent speaker and panelist on that subject. Joe works with a wide range of clients, including in the food and beverage, pharmaceutical, technology, sports, and manufacturing industries. Joe worked for three years in the Office of Tax Analysis at the U.S. Treasury Department prior to law school. Joe received his J.D., *magna cum laude*, from Harvard Law School, M.S. from Johns Hopkins University, and B.A., *magna cum laude*, from the University of Washington, where he was elected Phi Beta Kappa.