# Global IFA Travelling Lectureship Programme 2025 Topic: Pillar Two and its ramifications

WASHINGTON DC, USA 26 MARCH, WEDNESDAY

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## **Global IFA Travelling Lectureship Programme 2025 Topic: Pillar Two and its ramifications**

### WASHINGTON, DC 26 MARCH, WEDNESDAY

- (1) 16:00-17:30
- Holland & Knight 800 17th Street N.W. Suite 1100 Washington, DC
- **(م) Language:** English

**Registration:** Free of Charge

### Lecturer:



Joachim Englisch (Germany) Prof. Dr. Englisch holds a chair for public law and tax law at Münster University.

His research focuses on International and European tax law covering both, direct and indirect taxation.

Dr. Englisch serves as an advisor in expert groups of the OECD and of the EU Commission since 15 years, and he has given advice also to national governments, NGOs and MPs. He is also a visiting professor in several LL.M. programs.

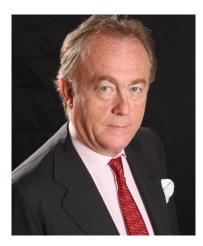
Dr. Englisch has published several books as well as approx. 200 scholarly articles, and he has given approx. 150 invited presentations. To register, please follow the link provided by the IFA USA







### **IFA REPRESENTATIVES**





**Guglielmo Maisto Global IFA President** 

**Robert Danon** Chairman of IFA's PSC



**Peter Glicklich IFA USA President** 





Dirk J. J. Suringa **IFA USA Vice President** 

### PANELLISTS



#### **Patrick Brown**

Co-Leader of PwC's Washington National Tax Services Practice

Prior to joining PwC, Pat was Vice President and Counsel, Tax for GE Power and GE Renewables and a GE corporate officer. He was also the director of tax policy for GE.

Prior to joining GE Power, Pat was a senior international tax counsel for GE corporate and GE Capital, where he primarily focused on GE's international operations in the Nordic region, EMEA, and Canada. He also had responsibility for the company's overall foreign tax credit position and was a principal technical advisor to the tax director of GE on tax policy matters.

Pat joined GE in 2002 from the US Treasury Department, where he served as attorney-advisor and associate international tax counsel from 1998-2002. During his time at Treasury, Pat focused primarily on international tax analysis, negotiation of tax treaties, and representing the US government at meetings of the OECD on various tax issues. Prior to joining the Treasury Department, Pat was an associate at Sullivan & Cromwell in New York. Pat received a B.S. in Mechanical

Engineering, with highest distinction, from the University of Virginia in 1991 and a J.D. from Georgetown University, magna cum laude, in 1995.



### **Chip Harter**

Former Deputy Assistant Secretary, US Treasury Department (Retired)

From September 2017 through November 2020, served and is a member of Microsoft's Tax and Customs Leadership the Department of the Treasury as Deputy Assistant Team. Tom's team is responsible for tax modernization and Secretary of Tax Policy for International Tax Affairs. As Deputy Assistant Secretary for International Tax center of excellence, customs, tax and customs controllership, Affairs, Mr. Harter was responsible for all international tax policy, and benefits taxation. matters at Treasury. He played a central role in Before joining Microsoft, Tom served as Tax Counsel to the U.S. Senate Committee on Finance and practiced law and accounting. representing the Treasury in the legislative process for the Tax Cuts and Jobs Act (TCJA), which was signed into law Tom started his career as a certified public accountant in in December 2017. Mr. Harter then led the development California and is an attorney licensed to practice in California and and issuance of an integrated set of regulations to the District of Columbia. He holds a Dual LL.M. (with distinction) implement the new international provisions of the TCJA, in Taxation and International and Comparative Law from Georgetown University Law Center, a J.D. from Loyola Law including regulations to implement the Global Intangible Low Tax Income (GILTI) regime, the Base Erosion Anti-School in Los Angeles, and a BS in Business Administration Avoidance Tax (BEAT), and the Foreign Derived Intangible (emphasis in accounting) from the University of Southern Income (FDII) regime. California.

Mr. Harter also represented the United States in tax Tom is a Board Member of the International Tax and Investment negotiations at the Organisation for Economic Center, National Foreign Trade Council (and former Chair of the Cooperation and Development (OECD). At the OECD he led Tax Committee), the Tax Council, and the Tax Foundation. He is a Vice-Chair of the International Chamber of Commerce's Taxation the US delegation in negotiations to revise long-standing international tax rules that provide for the allocation of Commission and the U.S. Council for International Business Tax taxing rights over multinational businesses, including Committee. Tom is a member of The IFA USA Branch Council, negotiations over the designs of Pillar 1 and Pillar 2. Central IFA Supervisory Board, and various U.S. and international organizations.

### **Tom Roesser**



Tax Policy Council, Microsoft

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Tom Roesser is Tax Policy Counsel for Microsoft Corporation

## **16:00-16.10.** Arrival attendees and Coffee

#### 16:10-16:20.

Welcoming words:

- Prof. Guglielmo Maisto (Global IFA President),
- <u>Peter Glicklich</u> (IFA USA President)

• <u>Dirk J. J. Suringa</u> (IFA USA Vice President)

### 16:20-16:25.

Opening of scientific agenda:

 Prof. Robert J. Danon, Chair of IFA's Permanent Scientific Committee: introduction of topic, objectives, travelling lecturer and panel composition.

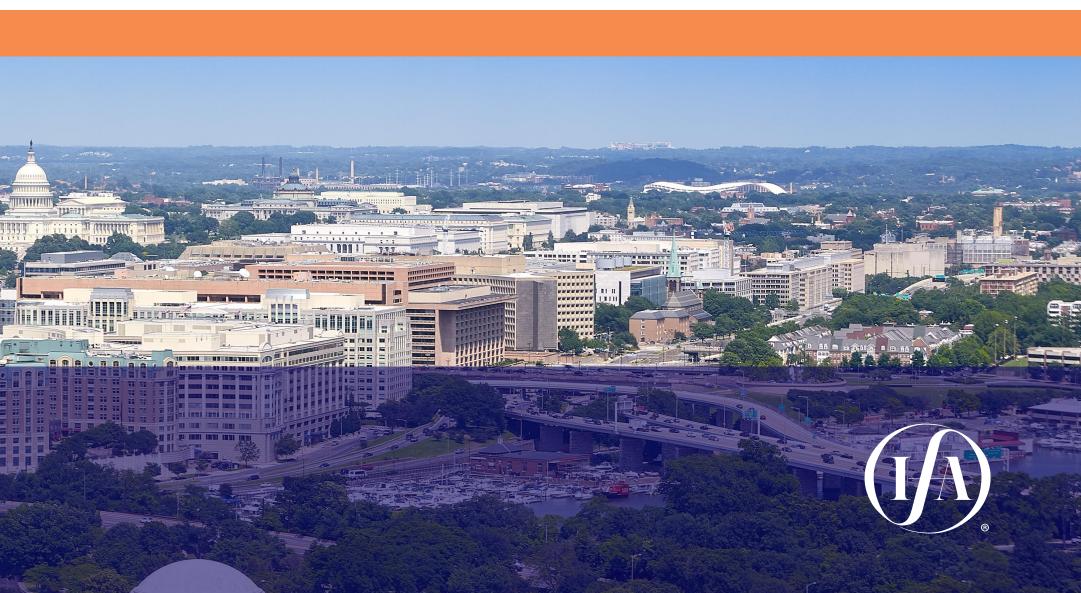
## Washington, DC

### 16:25-16:50.

Global Travelling lecturer's presentation:

• Prof. Dr. Joachim Englisch

Opening presentation blending a fundamental and practical international perspective with specific regional considerations. Emphasis will also be on the latest and most important developments, such as for example opened questions or the release of new Agreed Administrative Guidance.



16:50-17.15.

Panel discussion Follow up panel discussion with all constituenties of IFA (Policy Makers, Tax Administrations, Business and Academia). 17:15-17:30.Q&A with the floorConcluding remarks by theGlobal IFA PSC Representative.

**17:30-18:15.** Cocktail Reception

## Washington, DC



## **Global IFA TLP 2025: Locations**

### Europe

Berlin, Germany -26 February, Wednesday

Brussels, Belgium -27 February, Thursday

### North America

Toronto, Canada -25 March, Tuesday

Washington DC, USA -26 March, Wednesday

### **Asia Pacific**

Mumbai, India -7 April, Monday

Singapore -9 April, Wednesday

Seoul, Republic of Korea -11 April, Friday

### Africa

Johannesburg, South Africa -5 June, Thursday

date TBA





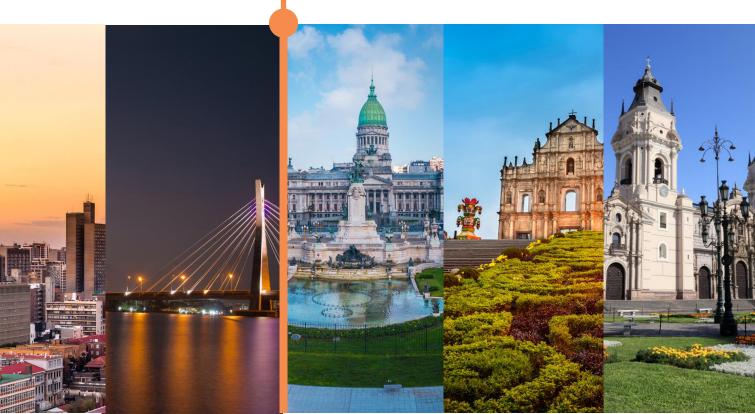
Lagos, Nigeria -

### Latin America

Buenos Aires, Argentina -30 June, Monday

São Paulo, Brazil -2 July, Wednesday

Lima, Peru -4 July, Friday



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