



Charles River Associates (CRA) Presents

Recent Changes in Transfer Pricing & What You Need to Know

Please join us on Thursday, October 7, 2010
9:30am – 1:30pm

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Santa Clara Marriott
2700 Mission College Blvd.
Santa Clara

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Continental Breakfast and Buffet Lunch will be Provided

Please RSVP by September 30th to Renata Ortiz @ rortiz@crai.com

Topics Include:

- **The New Chapters I-III of the OECD Guidelines: A Practical Perspective**
- **Key European Developments**
- **Israeli IP Issues**
- **The Israel Tax Authority's Recent Business Restructuring Position Paper**
- **US Ways & Means Committee Meeting and Other Pronouncements**
- **Economic Substance**

The event will conclude with an open Q&A session where any transfer pricing questions are welcome.

Presenters:

- **Rebel Curd, Vice President Silicon Valley:** Ms. Curd has experience in economic analysis and business valuations from a consulting and industry background. Her areas of expertise within intercompany pricing include acquisition/integration planning, global compliance and planning, intellectual property valuation and migration, and controversy. She has directly negotiated and/or participated in successful intercompany pricing audits with the Canadian, Finnish, French, German, Japanese, UK, and US taxing authorities.
- **Kathrine Kimball, Vice President San Diego:** Ms. Kimball has extensive experience in both international and domestic transfer pricing, encompassing documentation, planning, and controversy defense as well as supply-chain based tax planning. Having specialized in transfer pricing, she has managed a multitude of global, pan-European, pan-Asian, and North American international supply chain projects as well as US domestic supply chain projects, involving the restructuring and optimization of the tax structure within the context of a business reorganization.
- **Jonathan Lubick, Senior Consultant Israel:** Mr. Lubick, formerly with CRA, now heads Jonathan Lubick Consulting in Israel. Mr. Lubick has experience working on projects in the high technology, pharmaceutical, chemical, agricultural, heavy machinery, services, telecommunications, medical and textile industries. Additionally, Mr. Lubick is a member of the Business and Industry Advisory Tax (BIA) Committee for the OECD and has also assisted in the authoring of the Israeli transfer pricing regulations.
- **Gerben Weistra, Vice President Amsterdam:** Mr. Weistra has experience with a wide range of complex tax and economic issues related to transfer pricing for multinationals in several industries, including chemicals, consumer products, pharmaceutical, financial services, healthcare, and high technology. His experience includes the practical implications and commercial impact of developing and implementing transfer pricing strategies, and developing new transfer pricing systems in the context of international tax restructurings. Mr. Weistra has provided economic analyses and advice in a variety of transfer pricing engagements, including planning, audit defence, APAs, cost-sharing arrangements, and intellectual property valuation.