

Ceteris

Guide to
International Transfer Pricing
**Law, Tax Planning
and Compliance
Strategies**

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Guide to International Transfer Pricing

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Dr A. Michael Heimert is the president and CEO of Ceteris, and has over twenty years of experience providing transfer pricing documentation, planning, and defence services for multinational companies across a multitude of industries. He has been retained as an expert witness on many diverse transfer pricing matters for both corporations and tax authorities, including the IRS on GlaxoSmithKline Holdings (Americas), Inc. v. Commissioner of Internal Revenue. His expertise extends across all types of transfer pricing issues, including international, federal, and state tax, tax exempt entities and incentive performance.

Before founding Ceteris over six years ago, Dr Heimert was a partner and the national director of transfer pricing and economics at a Big Four firm. A frequent speaker at conferences dealing with transfer pricing issues, Dr Heimert has also written a number of scholarly and popular articles on transfer pricing and is the Managing Editor for a forthcoming book on International Transfer Pricing. In 2009, Dr Heimert was inducted into the Chicago Area Entrepreneurship Hall of Fame, and he is a member of the board of directors for several privately-held companies. Dr Heimert holds a PhD in economics from the University of Wisconsin-Milwaukee and a BS in business economics from Marquette University.

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Michelle Johnson is a Director with Ceteris and has significant experience advising clients on transfer pricing and valuation matters, including FIN 48 recognition and measurement analyses, inter-company services analyses, transfer pricing implementation strategies, audit defence, Advanced Pricing Agreements, global studies, cost sharing analyses, buy-in valuations, and

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tangible and intangible transfer pricing documentation. Michelle leads Ceteris' FIN 48 service line development and thought leadership and was commissioned to co-author the BNA Portfolio on FIN 48 and Transfer Pricing. She is an award winning speaker and presents frequently at industry associations such as Council for International Tax Education (CITE) and Tax Executives Institute (TEI). In addition, she has been selected for multiple BNA audiocast panels involving transfer pricing. Michelle works with Fortune 500 and Fortune 100 firms in a wide range of industries and has notable experience with financial services firms and technology companies. Michelle obtained her Masters degree in Economics from New York University and a BS in Economics and French from the University of Illinois.

Ceteris

Ceteris provides Transfer Pricing and Business Valuation services to many of the largest multinational companies, top-ranked law and accounting firms and leading government agencies around the world. As an independent firm, Ceteris' advisors are able to seamlessly collaborate with accounting, tax, legal and finance groups while providing objective viewpoints that are unequivocally free from regulatory conflict and independence concerns set forth by the SEC, PCAOB and other governing bodies. Ceteris' experts have considerable experience as both external and in-house advisors, providing clients with technical expertise coupled with well-defined practical solutions incorporating industry best practices with an unrelenting sense of urgency. In 2008 and 2009, Ceteris has been ranked in Inc. Magazine's '500/5000 Fastest Growing Private Companies in America'.

With a global group of advisors spanning the Americas, Europe and Asia, and with offices in the major metropolitan areas of Atlanta, Boston, Calgary, Chicago, Dallas, Los Angeles, Mexico City, New York, Salt Lake City, San Jose, Toronto, and Washington, D.C., and Auckland, New Zealand, Ceteris' extensive network allow for teaming and the provision of tailored services and analyses to comply with all tax jurisdictions.

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Félicie Bonnet is a lawyer with CMS Bureau Francis Lefebvre and specializes in international taxation and transfer pricing. Bonnet holds a master's degree in law and international taxation and a master of science in management. She has notably been involved in tax audits, transfer pricing planning and transfer pricing documentation for multinational companies.

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Before joining CMS Bureau Francis Lefebvre in June 2003, he has been a Tax Partner with Ernst & Young where he headed the Transfer Pricing practice of the French firm and was a member of E&Y Global Advisory Committee for Transfer Pricing.

He was the National Reporter for the e-commerce topic at the 2001 IFA Congress and a panellist at the 2007 IFA Congress on Cost Sharing Agreements. He is a Board member of the Chartered Institute of Taxation, European Branch. He is a frequent contributor to various French and international tax journals. He is a co-author of two books on transfer pricing published in 2008, *Prix de Transfert*, Editions Francis Lefebvre, and *Transfer Pricing Manual*, BNA. He has been consistently named as a leading French transfer pricing expert by the Legal Media Group's Guide to the World's Leading Transfer Pricing Advisors.

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Gareth Green is an independent UK specialist transfer pricing adviser, practising through his firm, Transfer Pricing Solutions Ltd. Green began his

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Green's work covers all aspects of transfer pricing and thin capitalization, including planning and design of transfer pricing policies (on a standalone basis or as part of wider tax planning and/or business change), preparation of compliance documentation, delivering tailored training workshops on transfer pricing to clients' staff, handling disputes/controversy with tax authorities, and negotiating APAs. His clients are primarily FTSE 100 and Fortune 500 companies and other companies of similar size, but also include several professional services firms and medium sized businesses, ranging down to a number of family-owned groups with turnover in the order of GBP 50–100 million. Clients are spread across a wide range of businesses, including professional services, insurance, investment management, consumer goods, online and traditional publishing, fashion, hedge funds, private equity houses, advertising, agriculture, engineering services, IT outsourcing, telecommunications hardware, websites, automotive parts, shipping, chemicals, food products, banking, real estate and freight. Green also works in association with several of the top ten UK law firms and with Ceteris, a transfer pricing specialist firm in North America and Australasia.

Green is a prolific author on transfer pricing, including several articles for *International Tax Review*. He authored a comprehensive update of the part of Simon's *Direct Tax Service* (a major looseleaf reference work on UK tax) that deals with transfer pricing and thin capitalization and is the Technical Editor of *Transfer Pricing Manual*, a book published by BNA International in September 2008. He has regularly been listed by Euromoney in their *Guide to the World's Leading Transfer Pricing Advisers* since the late 1990s. Green will be the UK reporter on the topic of Business Restructuring at the 2011 IFA Congress.

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