

Baker McKenzie.

2019 Asia Pacific Tax Litigation Conference

14 March | Singapore



Your speakers

China



Jason Wen

International Tax Director

Beijing

jason.wen

@bakermckenziefenxun.com

Jason Wen's practice focuses on PRC business and tax law related to foreign investment, disputes with tax authorities, PRC transfer pricing, mergers and acquisitions. He has over 16 years' experience in advising China tax and investment. Prior to joining the FenXun Partners, Mr. Wen worked for Baker McKenzie and an international accounting firm for years.

France



Ariane Calloud

Partner

Paris

ariane.calloud

@bakermckenzie.com

Ariane Calloud joined Baker McKenzie in 2007. Her practice is focused on tax dispute resolution and international corporate tax law. Ariane particularly assists multinational enterprises in the context of search and seizure procedures, following up tax audits in an international context, negotiations with the tax authorities and tax litigation. She is member of the Baker McKenzie EMEA Tax Dispute Resolution Steering Committee.

She is a regular lecturer in tax seminars and conferences on international tax dispute resolution topics.

Prior to joining Baker McKenzie, she worked as from 2004 in the tax department of Landwell & Associés (a correspondent of PricewaterhouseCoopers) where she practiced Corporate Tax and International Tax Law.

Ariane received a postgraduate diploma in elaborated studies (DEA) in Business Law at the University of Paris I Panthéon- Sorbonne in 2003 and a postgraduate diploma with a specialization (DESS) in Corporate Tax Law at the University of Paris IX Dauphine in 2004. She was admitted to the Paris Bar in January 2005.



Germany



Jana Fischer LL.M.

Associate

Frankfurt
jana.fischer
@bakermckenzie.com

Jana Fischer is a member of the Tax Practice Group of Baker McKenzie in Frankfurt. She advises German and non-German clients with respect to national and international tax. Her practice focuses on the representation of clients in tax disputes, including tax field audits and tax litigation. She also advises on structuring and implementing complex corporate restructurings including requests for binding tax rulings from the German tax authority. Jana studied law at the university in Göttingen and obtained an LL.M. in taxation. She is admitted to the Frankfurt bar since 2011 and has further been admitted as certified tax consultant since 2014. Jana is the author of several articles and publications and regularly speaks at seminars on topics related to tax dispute resolution.

Hong Kong



Steven Sieker

Partner

Hong Kong
steven.sieker
@bakermckenzie.com

Steven Sieker heads the Asia Pacific Tax practice group of Baker McKenzie across 12 countries. Mr. Sieker's practice focuses on Hong Kong and Asian regional tax advisory work, estate planning and tax litigation. He frequently represents clients in tax disputes with the Inland Revenue Department in Hong Kong. Steven is ranked as a leading individual for tax in Hong Kong by Chambers Asia and Chambers High Net Worth, Citywealth Leaders List, International Tax Review, Guide to the World's leading Tax Advisers, Benchmark Asia-Pacific, and Who's Who Legal. As per Chambers Asia Pacific, Steven is highly thought of in the market for his experience and work in the contentious tax space, and is also skilled at taking on wealth management matters.

Indonesia



Daru Hananto

Associate Partner

Jakarta
daru.hananto
@bakermckenzie.com

Daru Hananto is an Associate Partner - Tax Litigator in the Tax and Trade Practice Group at Hadiputranto, Hadinoto & Partners (HHP Law Firm), a member firm of Baker & McKenzie International.

Daru has extensive experience in Indonesian taxation. He has significant experience in tax litigation and controversy, and also in advising clients on taxation issues related to consumer goods, construction and Production Sharing Contract (PSC).



Ponti Partogi

Partner

Jakarta
ponti.partogi
@bakermckenzie.com

Malaysia



Jason Liang

Local Partner

Kuala Lumpur
jason.liang
@wongpartners.com



Kellie Yap

Associate

Kuala Lumpur
kellieallison.yap
@wongpartners.com

Ponti Partogi is head of the Tax and Trade Practice Group at Hadiputranto, Hadinoto & Partners (HHP Law Firm), a member firm of Baker & McKenzie International. His combined legal and accounting background allows him to provide comprehensive tax advice on various transactions both from the legal and the accounting perspectives. He is also a seasoned tax litigator who has been assisting clients on matters relating to tax disputes and controversies, transfer pricing, tax credits, double tax treaties, withholding tax, VAT and tax incentives.

Ponti Partogi has consistently voted as one of Indonesia's Tax Controversy Leaders from 2013 to 2017 and most recently, 2018.

Jason Liang is a partner in the Tax, Trade and Wealth Management Practice Group of Wong & Partners. His focus is on tax disputes and controversies, with experience in handling all aspects of tax litigation. He regularly appears before the national courts and tax tribunals, representing clients on landmark tax disputes and precedent setting cases.

He has advised and represented clients on a wide spectrum of issues ranging from anti-avoidance, transfer pricing, stamp duty, real property gains tax, customs duty, indirect taxes, deductibility of capital and income expenses, and withholding tax.

Kellie Yap is an associate with the Tax, Trade and Wealth Management Practice Group of Wong & Partners. She specialises in tax litigation, audits and investigations, primarily assisting clients during dawn raids conducted by the Director of Inland Revenue Malaysia and the Director General of Customs and Excise. She also represents clients on various litigation matters relating to goods and services tax, income tax, petroleum income tax, real property gains tax, transfer pricing, withholding tax, general tax incentives, and stamp duty.

She has also advised both multinational and government-linked companies in industries such as oil and gas, manufacturing and e-commerce with regards to tax investigation and tax compliance matters. She regularly appears before the national courts and tax tribunals.

Kellie has conducted various client trainings for various multinational companies in Malaysia, Singapore and Vietnam including trainings on tax investigations specifically on withholding tax on charter fees, tax litigation considerations during an audit and investigation, and general tax issues.



Philippines



Ronald Bernas

Partner

Manila
ronald.bernas
@quisumbingtorres.com

Ronald Bernas is a partner in Quisumbing Torres' Tax Practice Group. He has 20 years of experience advising clients on various tax issues, including general tax planning, tax controversies, tax litigation, and customs issues and procedures.

Ronald's practice focuses on general tax planning, protests of assessments, claims for refund and tax credits, and taxation of commercial transactions, mergers and acquisitions, and business reorganizations. His practice also covers trade and customs matters. He has represented and assisted clients in the power/energy/renewable energy, oil and gas, food and beverage, healthcare, and manufacturing industries on various tax issues including internal revenue deficiency tax assessments, and various claims for refund before the Bureau of Internal Revenue, the Court of Tax Appeals, and the Supreme Court.



Alexander Ner

Associate

Manila
alexander.ner
@quisumbingtorres.com

Alexander Ner is an associate in Quisumbing Torres' Tax Practice Group. He has handled tax advisory work involving various corporate transactions such as mergers, acquisitions, corporate restructuring and other special projects. He has also worked on tax litigation cases involving claims for refunds and assessments and has advised clients on matters involving customs and international trade.

Alexander's work experience includes general tax advisory services for domestic and international companies. He has represented clients in a number of tax assessments and claims for refund before the Bureau of Internal Revenue (BIR), various local government units, and the Court of Tax Appeals. He assists clients in handling tax and customs audits by the BIR and the Bureau of Customs.

Russia



Maria Kostenko

Partner

Moscow
maria.kostenko
@bakermckenzie.com

Maria Kostenko is a partner of Baker McKenzie Moscow office. Prior to joining our Firm in 2001, she worked as an auditor and tax consultant at a Big4 firm and then as a deputy director of the law department in one of the Moscow Tax Inspectorate responsible for major Russian taxpayers. Maria specializes in tax controversies, legal advice and support during tax audits, MAP, transfer pricing, tax due diligence, tax advice for M&A deals.



Singapore



Michael Nixon

Associate Principal, Economist

Singapore
michael.nixon
@bakermckenzie.com

Michael Nixon is an economist and seasoned transfer pricing practitioner. His experience includes leading transfer pricing planning, compliance and audit projects, as well as with APA and MAP work. He has also led business restructuring projects and conducted large-scale intellectual property valuations. He has been based in Singapore for the last seven years and is both a member of the Singapore Transfer Pricing consultation group with the Inland Revenue Authority of Singapore (IRAS), and has undertaken training for the IRAS Tax Academy. He also consults with Singapore academic institutions on transfer pricing and intellectual property valuation matters.



Chun Ying Ng

Local Principal

Singapore
chun.ying.ng
@bakermckenzie.com

Chun Ying Ng is a Local Principal of Baker McKenzie's Singapore office. Chun Ying has advised many multinational companies from various industries and countries on Singapore tax matters. She has also represented clients before IRAS in defending audits and assessments on a wide range of issues. Prior to joining Baker McKenzie, she practised commercial litigation at a top local firm. Chun Ying is also a regular speaker on tax topics at both Baker McKenzie client seminars and external events, and has delivered lectures for Singapore tax professionals.



Allen Tan

Principal

Singapore
allen.tan
@bakermckenzie.com

Allen Tan has extensive experience working on both international and local tax issues, with special focus on regional tax aspects of the transactions he is involved in. His practice includes advising clients on tax issues arising from M&A, private equity fund structuring, transfer pricing, indirect taxes, transfer taxes, tax controversies, foreign direct investment and cross-border tax planning issues. In recent years, Allen has also been actively engaged in tax policy work, in both Singapore and internationally.

Allen was named the 'Asia Tax Practice Leader of the Year 2018' at the International Tax Review's Asia Tax Awards. He is also recognised as a Band 1 lawyer for his tax controversy and corporate tax work in many other legal and tax directories, including Chambers and Partners and Legal 500. Allen was named 'Singapore's 40 most influential lawyers aged 40 and under in 2015' by Singapore Business Review, and appeared in Asian Legal Business (ALB)'s 40 under 40 List, an inaugural ranking of the brightest young legal minds across Asia Pacific.



Sanjiv Malhotra

Director of Economics

Singapore
sanjiv.malhotra
@bakermckenzie.com

Thailand



Nuthari Borpitpitak

Legal Professional

Bangkok
nuthari.borpitpitak
@bakermckenzie.com



Panya Sittisakonsin

Partner

Bangkok
panya.sittisakonsin
@bakermckenzie.com

Sanjiv Malhotra has extensive experience in India tax and transfer pricing matters and has been advising several Fortune 500 multinationals on a range of tax structuring, transfer pricing and cross-border dispute resolution matters. Sanjiv regularly participates in national and international discussions on policy aspects of transfer pricing. He has had articles published in the Bureau of National Affairs (BNA), International Taxation, International Fiscal Association and Euromoney. He also regularly speaks in national and international seminars in relation to transfer pricing and international tax matters including those organized by BNA Bloomberg, Tax Executives Institute, International Tax Review, among others. Sanjiv has worked on numerous global and regional assignments and has represented many multinational corporations during their transfer pricing audits and litigation in India. His core competencies lie in transfer pricing planning and dispute resolution, and he has been working on many Competent Authority and APA negotiations.

Nuthari joined Baker McKenzie in 2014, after three years of experience as a legal officer, assisting the Director of the Large Business Tax Administration Division, under the Thai Revenue Department, where she supervised tax audits and tax rulings for large companies in Thailand, international tax treaty negotiations, and mutual agreement procedures negotiations with foreign tax authorities.

As a member of Baker McKenzie's Tax Practice Group, Nuthari provides comprehensive legal advice on tax law, civil and commercial law and strategic use of specialized tax benefit schemes. Moreover, she has contributed to the resolution of a number of tax audits and disputes.

Panya joined Baker McKenzie in 2002 and became a Partner in 2012. He is currently a partner in the Tax Practice Group. He also leads the International Commercial & Trade Practice Group, and in particular, practices in the customs and supply chain areas.

During his 16 years of practice with the Firm, Panya has been recognized for advising clients on highly complex tax structures, offshore investment, international tax planning, tax disputes, and tax litigation. His practice also includes boutique tax areas e.g., customs duty, excise tax, and property tax.



USA



Mark Oates

Partner

Chicago
mark.oates
@bakermckenzie.com

Mark A. Oates is tax partner in the Chicago Office of Baker McKenzie, and former Chair of the Firm's North American Tax Controversy Practice. Since 1985, his practice has concentrated on large case tax litigation. Mr. Oates has litigated a number of the high profile cases won by taxpayers in the last decade, including the VERITAS, Seagate, Compaq, Sundstrand and Perkin-Elmer cases and has actively consulted on a number of other high profile cases. In addition to transfer pricing and financial products tax litigation, Mr. Oates has also been involved in a wide range of international tax litigation cases, including tax treaty interpretation issues, Subpart F issues, foreign tax credit issues, as well as a host of domestic tax litigation issues including merger and acquisition related issues, leveraged buy-out issues, valuations, research credit issues, inventory issues and civil fraud issues. He has also devoted a significant portion of his career to criminal defense, including defending corporations and individuals in connection with tax fraud, money laundering, State and Commerce Department export issues, Classified Information Procedures Act cases, and pro bono murder cases.

Vietnam



Thanh Vinh Nguyen

Partner

Ho Chi Minh City
thanhvinh.nguyen
@bakermckenzie.com

Thanh Vinh Nguyen is a Partner in the Baker McKenzie Ho Chi Minh City office, where he leads the Tax and Customs practice group in Vietnam. Mr. Nguyen's practice areas include tax and customs, trade and general commercial matters. Prior to joining Baker McKenzie's Ho Chi Minh City office in 2004, Mr. Nguyen practiced tax advisory work for two international accounting firms for eight years and worked in the compliance function of an international insurance company. An expert in tax planning and law, Mr. Nguyen has assisted clients with advice and structuring work as well as contentious appeals with the tax authorities. Mr. Nguyen is an award winning practitioner, recently recognized by the International Tax Review in the categories of: Indirect Tax Leader (2018) and Tax Controversy Leader (2017) as well as being ranked as a Leading Lawyer for Taxation in Legal 500 Asia Pacific (2017).

www.bakermckenzie.com

©2019 Baker & McKenzie. All rights reserved. Baker & McKenzie International is a global law firm with member law firms around the world. In accordance with the common terminology used in professional service organizations, reference to a "partner" means a person who is a partner or equivalent in such a law firm. Similarly, reference to an "office" means an office of any such law firm. This may qualify as "Attorney Advertising" requiring notice in some jurisdictions. Prior results do not guarantee a similar outcome.