



Baker McKenzie Speakers



Brendan T. Kelly

Chair of Asia Pacific Tax
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Brendan is the Chair of Asia Pacific Tax Group and head of the China tax practice. He has practiced tax with an Asian focus for over 20 years, with over 16 of those years based in China. He has performed a wide range of analysis for various industries with regard to Asia structures. While China has been his career focus, he has a wealth of experience in working with multinationals both in China and across the region in major mergers and acquisitions to develop integrated and tax-efficient supply chain structures. Most recently, focus has been heavily on defense against tax audits and assessments in China.



Yvonne Beh

Partner

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Yvonne is a partner with 15 years of experience, and leads the Indirect Tax sub-practice of the Tax, Trade and Wealth Management Practice Group of Wong & Partners. She specialises in indirect tax issues, in particular goods and services tax (GST) (before its abolishment) and sales and service tax (SST) issues. She also has extensive experience advising on broader Malaysian tax issues, spanning across M&A, foreign direct investment and cross-border tax planning issues. She also regularly advises on income tax, withholding tax, real property gains tax, stamp duty and tax controversies. Yvonne has been invited to participate in various consultations with the Ministry of Finance and Royal Customs of Malaysia, to provide feedback on the transition from GST to SST as well as SST-related changes and developments, including the upcoming introduction of service tax on imported digital services. Yvonne is often called upon by clients to advise on sophisticated and complex issues relating to the Malaysian tax and indirect taxes. This is particularly so for clients in the e-commerce, technology and digital economy industries, which have products and service offerings which are new, innovative and unconventional.



Ronald Bernas

Partner

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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. His 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.



Simone Bridges

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Simone is a partner in the Sydney office of Baker McKenzie. She advises multinationals and large domestic clients on Australian tax issues, indirect taxes, cross border tax issues, managing tax controversy for multinationals and customs/trade. Her practice includes planning and advisory work, tax disputes as well as negotiations with revenue officials on a range of matters. She holds a leadership role on the Firm's Global Indirect Tax Steering Committee, representing the Asia-Pacific region.



Frederick Burke

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Fred is the Managing Partner of Baker McKenzie in Vietnam. He has extensive experience in International Trade, WTO and Customs, M&A, Foreign Investment & Securities, Banking & Finance, International Employment, Real Estate, Construction/Projects, Taxation and Dispute Resolution.

Having served in the Firm's offices in New York, Shanghai and Hong Kong, Fred came to Vietnam in 1991, where he became the first American to study at the University of Ho Chi Minh City after 1975. He helped found the American Chamber of Commerce in Vietnam, has served as Chairman and Board member of its Ho Chi Minh City chapter for many years. He serves on the Prime Minister's Advisory Council on Administrative Reform, he co-chairs the Investment and Trade Working Group of the Vietnam Business Forum, and he has been recognized by the Ministry of Justice for his "Outstanding contributions in the field of international legal cooperation."



Jon Cowley

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Jon is a member of Baker McKenzie's Hong Kong office. Jon's practice focuses on Asia-Pacific customs and trade matters, including controversy and audit support, duty and indirect tax planning, supply chain structuring and trade compliance advice. His practice concentrates on the laws, regulations and international agreements governing the cross-border movement of products, technology and services, including customs, free trade agreements, export controls, sanctions, indirect tax, and other cross-border regulatory regimes. In prior in-house and external roles, Jon focused on customs duty and indirect tax planning, controversy and audit support, strategic supply chain planning, and trade compliance program enhancement.



Jon Eichelberger

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Jon is the co-head of the China Tax Practice of Baker McKenzie. After having lived and worked in China for 29 years, he is now based in our Firm's San Francisco office. He focuses on tax planning and advice for inbound business to China, including acquisitions, divestitures, reorganizations, joint ventures, technology transfer, and the establishment of distribution, sourcing and services operations. He also has many years of experience with commercial transactions, such as mergers and acquisitions and other forms of direct foreign investment and trade with China.



Dominika Korytek

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Dominika is a partner in the Firm's San Francisco office. She routinely advises businesses on strategies for international expansion, domestic and international acquisitions, reorganizations and dispositions. She focuses her practice on matters relating to the US federal income taxation of corporations, with emphasis on international tax planning in mergers and acquisitions, pre- and post acquisition reorganizations, dual consolidated loss issues, permanent establishment risk analysis, withholding tax and indirect (VAT/GST) tax planning. She has also assisted clients to negotiate with foreign tax authorities to influence public policy.



Guillaume Le Camus

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Guillaume is a partner in Baker McKenzie Paris' Tax Group and chair of the Firm's Europe Tax Planning & Transaction Group. Before joining the Firm, he practiced international tax law at the correspondent firm of a Big Four accounting firm in Paris and New York. Guillaume has extensive experience in French and international corporate tax law. His practice focuses on international tax, reorganization, mergers and acquisitions, and private equity transactions.



Dennis Lee

Senior Tax Consultant

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Dennis practices in the area of tax law. He is a certified public accountant, and currently serves as a member of the Taiwan CPA Association and Taipei City CPA Association. His practice includes structuring the Taiwan operations and transactions of foreign enterprises, including its representative offices, branches and subsidiaries. He also provides tax advice in relation to pre-acquisition modeling and post-acquisition restructuring, as well as VAT-related matters. His practice likewise covers intercompany transfer pricing.



Shih Hui Lee

Local Principal

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Shih Hui has advised on both regional and Singapore tax issues, focusing on advising multinational companies on the international tax aspects of cross-border transactions. Prior to joining Baker McKenzie Wong & Leow, Shih Hui worked in one of the Big Four accounting firms in Singapore. She has also been a regional tax advisor in one of Singapore's multinational broadcasting companies. Her practice focuses on tax consultancy in international taxation, group and business restructuring, tax controversy and compliance, and mergers and acquisitions.



Jason Liang

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Jason is a partner in the Tax, Trade and Wealth Management Practice Group of Wong & Partners with close to decade of experience. 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, with a portfolio of clients from various industries, including pharmaceutical, logistics, manufacturing and oil & gas.



Amy Ling

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Amy is a member of Baker McKenzie's Hong Kong office. She has extensive experience in tax matters, having previously worked at a Big Four accounting firm and a major investment banking firm based in New York. She advises multinational companies on a range of issues relating to PRC tax and legal implications of investments in China, including mergers and acquisitions, divestitures, reorganizations, post acquisition integration, licensing, retail structures, supply chain structures and individual income taxation matters.



Carrie Lui

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Carrie is a registered foreign lawyer in Baker McKenzie Hong Kong office. She advises on a wide range of tax matters including corporate restructuring, merger and acquisitions, private equity and investment funds and tax disputes with experience across a broad range of sectors and industries. She regularly works with individuals and trustees on tax related issues and has experienced in servicing funds management clients. She also has experience in assisting clients with contentious tax disputes and in obtaining rulings and indicative views from the tax authorities.



Ria Muhariastuti

Senior Tax Specialist

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Ria is a Senior Tax Specialist in the Tax & Trade Practice Group, Hadiputranto, Hadinoto & Partners (HHP Law Firm), a member firm of Baker & McKenzie International. She concentrates on domestic and international tax planning relating to inbound and outbound investment, multinational companies and private banking for individuals. She has also assisted clients on matters relating to wealth management, transfer pricing and business restructuring.

Ria handles clients from various different sectors such as oil & gas, IT/C, consumer goods and manufacturing. Her extensive experience as well as her tax background allows her to provide comprehensive tax advice on a wide range of transactions.



Michelle Ng

Associate

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Michelle Ng is an associate in Baker McKenzie's Palo Alto office, where she advises multinational corporations on domestic and international tax planning. Her practice focuses on domestic and international tax planning, including intellectual property migration, subpart F planning, foreign tax credit planning, tax-efficient cash repatriation strategies, and post-acquisition integration and implementation. Michelle is currently relocating for a one-year assignment in the Singapore office.



Michael Nixon

Principal, Economist

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Michael leads our transfer pricing practice in Singapore, where he has been based for the last nine years. He is a seasoned transfer pricing economics and tax practitioner and has advised multinationals across various industries throughout the planning, compliance and audit cycle. The focus of Michael's practice is on projects requiring advice on sophisticated and complicated transfer pricing matters, in particular focusing on large-scale multinational corporations. He supports his clients on complex multi-jurisdictional transfer pricing planning strategies, regional and global transfer pricing compliance, intellectual property valuation, advance pricing agreements and highly complex and sophisticated transfer pricing disputes.



Michael Olesnicky

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Michael is a senior consultant based in Baker McKenzie's Hong Kong office. He had served as the Asia Pacific Chair of the Tax Practice from 2000 to 2014, and was a member of the Global Tax Steering Committee. He has more than 25 years' experience advising on corporate tax, wealth management, trust planning and estate succession matters. His practice focuses on Hong Kong and Asian regional tax advisory work, tax disputes and litigation, as well as wealth management and estate planning.



Ponti Partogi

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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. He has been practicing for more than 20 years, focusing on domestic and international tax and trade issues relating to inbound and outbound investment and cross-border corporate exercises including JVs, M&As, divestitures, spin-offs and takeovers.

Ponti Partogi 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.



Dawn Quek

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Dawn has 15 of experience in corporate tax and international tax planning and has worked in both the Singapore and Hong Kong tax practices of Baker McKenzie. Dawn's practice focuses on providing and coordinating regional and local tax advice for multinational corporations and financial institutions on cross-border transactions and on tax restructurings. Her practice includes advising multinationals and financial institutions on the tax issues arising from the set-up of their regional operations, such as structuring their operations, obtaining tax incentives, planning for indirect taxes (such as goods and services tax and stamp duty) and tax restructuring. She also has extensive experience in advising on tax issues in respect of mergers and acquisitions and has assisted many clients in the resolution of tax disputes.



Salim Rahim

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Salim is the chair of the Firm's Global Transfer Pricing Group. He has extensive experience in transfer pricing matters, including transfer pricing planning, compliance, and tax controversy. He has represented clients in all administrative phases of a controversy. He advises clients on matters involving examination, appeals, advance pricing agreements, and competent authority. In particular, his practice involves negotiating and facilitating advance pricing agreements for US and foreign-based multinational companies in the software, e-commerce, pharmaceutical, manufacturing, automobiles, sports footwear and apparel, financial services and other industries.



Antonio Russo

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Antonio is an established practitioner of international tax law. He is a partner with Baker McKenzie Amsterdam's award-winning Transfer Pricing Team. He specializes in Transfer Pricing design, implementation and valuation of companies and intangible assets. He has extensive experience in tax planning/restructuring engagements, and has performed TP studies for clients in numerous industries. Antonio has also provided assistance to clients in developing strategies for the conclusion of APA's as well as tax audit defense in Europe and the USA.



Steven Sieker

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Steven Sieker is the Managing Partner for Baker McKenzie's China and Hong Kong offices. He practices exclusively in the area of tax law, and is recognized as a leading individual in tax as well as private client and wealth management by Chambers Asia Pacific, Citywealth Leaders List and Guide to the World's leading Tax Advisers. He focuses his practice on Hong Kong, Canadian and Asian regional tax advisory work, tax and estate planning — especially for high-net worth individuals — and tax litigation. Steven frequently represents clients in tax disputes with the Inland Revenue Department in Hong Kong.

He is a past member of the Hong Kong Inland Revenue Department Board of Review and has been a part-time instructor in Tax and Revenue Law at The Hong Kong University and City University of Hong Kong. He is a member of the Society of Trust and Estate Practitioners (STEP) and is a former executive director of STEP and the Canadian Chamber of Commerce in Hong Kong. He is the chairman of the Revenue Committee of the Law Society of Hong Kong and a member of the Joint Liaison Committee on Taxation. He is also a former clerk to the Supreme Court of Canada.

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.



Panya Sittisakonsin

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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 17 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.

In 2018, Acritas Sharper Insight named Panya a 'Stand-Out Lawyer.' He is ranked Tier 1 by Legal 500 and Band 1 by Chambers Asia Pacific. Additionally, International Tax Review has named him an 'Indirect Tax Leader' twice and 'Tax Controversy Leader' four times since 2013.



Allen Tan

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Allen Tan is the head of the Tax, Trade and Wealth Management practice in Baker McKenzie Wong & Leow. He 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. Allen has also been actively engaged in tax policy work, both in Singapore and internationally.

Ranked as a Band 1 Lawyer in Chambers Asia Pacific, Allen is also recognised as a leading lawyer for his tax controversy and corporate tax work in many other leading legal and tax directories including Legal500 and International Tax Review. He was also recognized as one of 'Singapore's 40 most influential lawyers aged 40 and under' in 2015 by Singapore Business Review and in Asian Legal Business (ALB) 40 under 40 List (2015), an inaugural ranking of the brightest young legal minds across Asia Pacific. Allen was also named the Asia Tax Practice Leader of the Year 2018 by International Tax Review.



Aek Tantisattamo

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Aek has over 15 years' experience working in international law firms. He joined the Tax Practice Group of Baker McKenzie in 2004, after practicing at another international law firm in Bangkok in the Litigation, International Capital Markets, and Banking & Finance practices.

Aek advises on tax law, tax planning, tax controversy, mergers and acquisitions, tax planning for outbound/inbound investments, transfer pricing, e-commerce tax and civil and commercial law. In addition, he has played a key role in resolving a number of tax disputes and guiding various major transactions for international clients.

Since 2013, the International Tax Review has recognized Aek as a 'Tax Controversy Leader' five times. He enjoys lecturing on tax at leading universities in Bangkok.



Jason Wen

International Tax Director

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Jason's practice focuses on PRC business and tax law related to foreign investment, disputes with tax authorities, PRC transfer pricing, mergers and acquisitions. Prior to joining the Firm, he worked with an international accounting firm.



Edwin Whatley

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Edwin Whatley is the Head of the Firm's Tax & Transfer Pricing Group in Tokyo and is highly experienced in both US and Japanese tax law. Edwin focuses on international taxation, corporate and international tax planning, transfer pricing and tax controversies for Japanese and foreign corporations. He also works with clients on reorganizations and acquisitions in Japan. He advises on transfer pricing analysis and controversies, and helps Japanese multinationals on foreign tax issues. He is seasoned in unilateral and bilateral transfer pricing matters involving Japan, the US and other countries. He also handles tax structuring, preparation of documentation, and Japanese tax rulings to reduce or eliminate withholding tax on transactions in software and other intangibles, as well as Japanese consumption tax and customs.



Adeline Wong

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Adeline heads Wong & Partners' Tax, Trade and Wealth Management practice. She has 30 years of experience spanning a broad category of tax work which encompasses corporate tax planning and advisory, including local, regional and cross-border corporate exercises, transfer pricing, tax audits, tax controversies, foreign trade and WTO matters, and wealth and trust management, for both local and international clients. Adeline's extensive experience in tax planning and tax advisory for local, regional and cross-border corporate exercises include joint ventures, new operations, mergers and acquisitions, restructuring and downsizing, among others. She has advised investment banks, other financial institutions and high net worth families, on tax, trust, and estate planning issues, focusing on onshore and offshore trust structures and other vehicles to help clients hold and transfer wealth. She also advises financial institutions that provide service to high net worth individuals on securities as well as corporate and regulatory issues in relation to their operations in Malaysia.



Shanwu Yuan

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Shanwu assists large multinational enterprises with operations in China and elsewhere on various transfer pricing issues, in particular advance pricing arrangements (APAs) and mutual agreement procedures (MAPs). He also works on other Chinese tax issues, including interfacing with the Chinese tax authorities on behalf of taxpayers.



Lawrence Zlatkin

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Lawrence is tax counsel in the New York office, having joined Baker McKenzie after almost 25 years of practice in house at the General Electric Company and GE Capital Corporation. He focuses on the international tax aspects of cross border investment. He has long standing experience in US inbound and outbound investments and has worked on integrating and applying US and non-US tax laws to M&A and transactional planning in various parts of the world. He developed and managed tax teams in many non-US jurisdictions and has a keen sense of how other tax rules and laws mesh with the US tax system.



Guest Speakers



Sanjiv Malhotra

Senior Director and Chief
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Sanjiv 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. He has worked on numerous global and regional assignments and has represented many multinational corporations during their tax and transfer pricing audits and litigation in India. His core competencies lie in tax and transfer pricing planning and dispute resolution, and he has been working on many Competent Authority and APA negotiations. Mr. Malhotra regularly participates in national and international discussions on policy aspects of international tax and transfer pricing. His articles have been published by media houses including Bureau of National Affairs (BNA), International Taxation, International Fiscal Association (IFA) and Euromoney. He 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, IFA etc.

Till recently Sanjiv with working Baker McKenzie in its Singapore office. At Baker McKenzie, Mr. Malhotra was a member of Baker McKenzie's global transfer pricing steering committee and the steering committee for the firm's global India practice.



Jay Shim

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With 30 years of working experience in three continents, Jay co-leads the tax practice at Lee & Ko and advises clients on tax advisory, tax audits, tax appeals and tax litigation matters. Jay is a member of the International Bar Association, the International Fiscal Association and the Inter-Pacific Bar.