

News, Events & Publications

Jonathan Martin

Presentations

- Presenter, "Inversions are Not Going Away" at *TPT Client Seminar*, New York, New York, March 2016
- Presenter, "Developments on Taxation of Oil & Gas, Energy and Infrastructure Sector in Latin America" at *LATAM Tax Conference*, Miami, Florida, February 2016
- Presenter, "Cash Repatriation" at *NATPG Client Seminar*, Miami, Florida, January 2016
- Present "Inversion Transactions---Not Dead Yet!" at *Texas State Bar International Tax Symposium*, Houston and Dallas, Texas, November 2015
- Presenter, "Using Partnerships in Business Acquisitions and Dispositions" at *Doing Business Globally Seminar*, Houston and Dallas, Texas, October 2015
- Presenter, "What's the Future of Inversions" at *Tax Directors Workshop*, Lake Tahoe, California, October 2015
- Presenter, "International Tax Legislative, Treaty and Ruling Update" at *Houston TEI Global Tax Symposium*, Houston, Texas, September 2015
- Presenter, "Inversions" at *TPT Client Seminar*, New York, New York, April 2015
- Presenter, "IP Boxes, Returns to Risk and Capital, and Pricing 'Special Measures'" at *Houston Tax Executives Institute Tax School*, Houston, Texas, February 2015
- Presenter, "Foreign Investment in U.S. Energy Assets" at *ABA Section of Taxation Mid-Year Meeting*, Houston, Texas, January 2015
- Presenter, "Corporate Inversions" at *Denver Tax Executives Institute Federal Tax Day*, Denver, Colorado, December 2014
- Presenter, "Inversions: The Revolution Continues for U.S. Tax Independence" at *Tax Executives Institute Austin Tax Workshop*, Austin, Texas, November 2014
- Presenter, "Business Combination Inversions" at *Texas State Bar International Tax Symposium*, Houston and Dallas, Texas, November 2014
- Presenter, "Revisiting Corporate Inversions" at *International Fiscal Association Meeting*, Houston, Texas, October 2014
- Presenter, "Inversions Through Business Combinations" at *Houston TEI Global Tax Symposium*, Houston, Texas, October 2014
- Presenter, "Business Combination Transactions and Debt Repatriation Issues" at *Tax Executives Institute Tax School*, Houston, Texas, May 2014

- Presenter, "Let's Talk Inversions---Yes, They Still Exist!" at *Tax Directors Workshop*, Kiawah, South Carolina, April 2014
- Presenter, "What To Do With Offshore Cash: Acquisitions, Repatriation and Intercompany Lending" at *Tax Executives Institute Dallas Chapter Meeting*, Dallas, Texas, August 2013
- Presenter, "Inversions Through M&A Transactions, Tax-Efficient Acquisition Structures and Post-Acquisition Integration Planning" at *Tax Executives Institute Tax School*, Houston, Texas, May 2013
- Presenter, "The Rescission Doctrine: Broad Weapon Against Unintended Tax Consequences?" at *Tax Executives Institute Tax School*, Houston, Texas, May 2012
- Presenter, "What Drives Deal Structures: Balancing Finance, Tax and Liability Issues and Regimes" at *UT School of Law 2012 International Upstream Energy Transactions program*, Houston, Texas, February 2012
- Presenter, "International Tax Planning Strategies" at *State Bar of Texas 14th Annual International Tax Symposium*, Dallas, Texas, November 2011
- Presenter, "Tax Free International Mergers and Acquisitions" at *CITE and Networking seminars*, Houston, Texas, November 2011
- Presenter, "Economic Substance, Uncertain Tax Positions and Select Tax Treaty Developments" at *Tax Executives Institute Tax School*, Houston, Texas, February 2011
- Presenter, at *Global Employment Company Seminar*, October 2010, Houston, Texas
- Presenter, at *New Tax Legislation Seminar*, Houston, Texas, September 2010
- Presenter, at *Global Restructuring Seminar*, Houston, Texas, June 2010
- Presenter, "Partnerships in M&A Transactions" at *Tax Executives Institute Tax School*, Houston, Texas, February 2010
- Presenter, "Modern Tax Treaty Limitation on Benefits Provisions---Anti-Treaty Shopping and Beyond" at *International Tax Forum of Houston meeting*, Houston, Texas, October 2009
- Presenter, "Life Without a U.S. Parent Company?---Inversions" at *North America Tax Planning Workshop*, Chicago Illinois, August 2009
- Presenter, "Tax Planning Opportunities for Loss Utilization---Making the Most of a Down Economy" at *Tax Executives Institute Tax School*, Houston, Texas, May 2009
- Presenter, "A Fresh Look at Repatriation: Strategies for Repatriating Foreign Earnings in a Tax Efficient Manner" at *2009 North America Tax Conferences*, Houston and Dallas, Texas, January 2009
- Presenter, "U.S.-Canada Treaty Protocol" at the *Tax Executive Institute International Roundtable*, Houston, Texas, July 2008
- Presenter, "Proposed Contract Manufacturing Regulations" at *International Tax Forum of Houston Meeting*, Houston, Texas, June 2008
- Presenter, "Final Section 1248 Regulations and Notice 2008-10" at the *Tax Executive Institute International Roundtable*, Houston, Texas, January 2008

- Presenter, “The DCL Regulations and Cross-Border Financing” at *ABA Tax CLE on the Road Series*, Dallas, Texas, November 2007
- Presenter, “Understanding Tax Treaties” at *ATLAS Seminar*, Houston, Texas, September 2007
- Presenter, “Evolution of Statutory Mergers, Demise of Leveraged Triangular Reorganizations and Select Economics Substance Issues” at *ATLAS Seminar*, Chicago, Illinois, August 2007
- Presenter, “Update on Tax Treaty Developments” at *International Association of Drilling Contractors Annual Meeting*, Marco Island, Florida, June 2007
- Presenter, “Tax Issues Involving Mergers and Acquisitions” at *Tax Executive Institute Meeting, Overland Park*, Kansas, February 2007
- Presenter, “International Tax Developments” at *Tax Executive Institute Meeting*, Tulsa, Oklahoma, February 2007
- Presenter, “Tax Issues Involving Mergers and Acquisitions” at *Tax Executive Institute Meeting, New Orleans*, Louisiana, January 2007
- Presenter, “Tax Treaties and Permanent Establishments” at *ATLAS Seminar*, November 2004 and Houston, Texas, October 2006
- Presenter, “European Thin Cap Rules and Holding Company Structures” at *TEI Seminar*, Dallas, Texas, April 2004
- Author, The Misappropriation Theory: Overextension of § 10(b) and Rule 10b-5 or Broad Weapon Against Outsider Trading, 37 *Washburn L.J.* 459