

KPMG Presenters

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Cameron Taheri

Transfer Pricing Dispute Resolution Lead, Principal – Washington National Tax | Tax Controversy and Dispute Resolution



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Education and qualifications

- J.D., Northeastern University School of Law
- B.A., Economics, University of Texas at Austin

Background

Cameron Taheri is a Principal in KPMG's Transfer Pricing Dispute Resolution Group. He specializes in resolving transfer pricing disputes on behalf of multinational corporations, including Advance Pricing Agreements, Competent Authority settlements, and Examination and Appeals. Previously, Cameron was a Team Leader in the Advance Pricing and Mutual Agreement Program (APMA) at the Internal Revenue Service.

Professional and industry experience

- Prepare and develop Advance Pricing Agreements and Competent Authority settlements between multinational corporations, the IRS and foreign governments, including Canada, India, Italy, Switzerland, U.K., France, Germany, Japan, China, Korea, and Turkey.
- Experience includes a broad range of transactions and industries; including consumer goods, oil and gas, automotive, life-science, financial services, and technology companies, with an emphasis on intangible transfers, cost sharing transactions, and high-value services.
- Analyze U.S. Income tax treaties to provide clients with double tax relief on the following non-transfer pricing issues: permanent establishment, income sourcing and characterization, foreign tax credits, and shipping and transportation income.
- Assist clients with navigating IRS Examination and Appeals including responding to Information Document Requests and preparing protest letters



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Luca Bonardi

Consumer Product Transfer Pricing Industry Lead, Principal | Economic and Valuation Services



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Education and qualifications

- BA, Economics, Brescia, Italy
- MS, Economics, Fordham, New York
- PhD, Economics, Fordham, New York

Background

Luca is a Principal in the Short Hills office and brings over 20 years of experience working with a diverse client base on various transfer pricing issues. He led transfer pricing studies for multinational corporations, including the preparation of global BEPS compliant documentation, transfer pricing planning to assist company expand organically or through acquisitions, valuation of intangible assets, and optimization of transfer pricing structures.

Professional and industry experience

- Valued trademarks and technologies for U.S. and European multinational corporations and assisted them to implement, maintain, and document cost sharing arrangements.
- Performed transfer pricing and trade and customs (T&C) planning analysis for a range of companies. This included the preparation of transfer pricing and T&C reports and assisting the companies in the review of their policies to evaluate transfer pricing and T&C implications of changes in the policies.
- Assisted clients in evaluating the tax impact of alternative transfer pricing policies reflecting new transactions or operations in various countries, including Latin America and Europe. He worked with value-added tax (VAT), T&C, and international tax colleagues to model the impact of the transfer pricing policy on the company's tax position
- Assisted clients with the preparation and negotiation of Unilateral and Bilateral APAs in the U.S. and in numerous European countries, as well as in China and in India.
- Provided advice and assistance to U.S. and foreign-based multinational clients in successful negotiations with the International Revenue Service (IRS) and foreign tax authorities through audits as well as MAPs.



Thank you