

## Professor Stephen E. Shay

Stephen Shay practices and teaches tax law. Shay is a former U.S. Treasury Deputy Assistant Secretary for International Tax Affairs and is a retired partner of Ropes & Gray, LLP.

Shay has taught U.S. tax law courses as a Professor of Practice at Harvard Law School, as an Adjunct Professor at Boston College Law School, and as a Lecturer at Yale Law School, Oxford University (MSc. in Taxation) and the Leiden International Tax Institute (Masters in Taxation). Shay was the IBFD Professor in Residence for 2015.

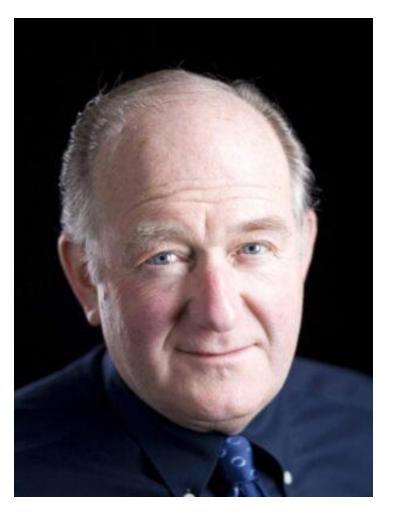
Shay consults for international organizations and private parties and has testified as an expert before judicial and arbitral tribunals on behalf of governments and private litigants. Shay has been retained as an expert witness by the revenue authorities of Australia, Ireland and New Zealand and by private parties in investor-state arbitrations with Canada and Russia. Shay has served as an expert consultant to the International Monetary Fund on tax policy missions to Dominica, Kenya, Switzerland, Tanzania and Uganda. Shay has had extensive practice experience in the international tax area and while in active practice was recognized as a leading practitioner in Chambers Global: The World's Leading Lawyers, Chambers USA: America's Leading Lawyers, The Best Lawyers in America, Euromoney's Guide to The World's Leading Tax Advisers and Euromoney's, Guide to The Best of the Best.

During his two tours of U.S. government service, Shay actively participated in the development and enactment of international provisions in the Tax Reform Act of 1986 and in 2010 the Foreign Account Tax Compliance Act (FATCA), as well as other international tax legislation. He was the U.S. delegate to the negotiation of the 1988 Council of Europe and OECD Multilateral Convention for Mutual Assistance in Tax Matters and in 2009 – 2010 he served as the U.S. delegate to the G20/OECD's Global Forum for Transparency and Exchange of Information in Tax Matters. He has had principal responsibility for the U.S. tax treaty network, and has served as a treaty negotiator.

Shay serves on the Executive Committee of the New York State Bar Association Tax Section and the Leadership Council of the Harvard Law School Wilmer Hale Legal Services Center. Shay is a past President of the American Tax Policy Institute Board of Trustees and has been active in the American Bar Association Tax Section as a Council Director and Chair of the

Committee on Foreign Activities of U.S. Taxpayers, in the American Law Institute as a Life Member and an Associate Reporter and in the Taxes Committee of the International Bar Association.

Shay is a 1972 graduate of Wesleyan University, and he earned his J.D. and his M.B.A. from Columbia University in 1976. He is admitted to practice before the bars of New York and Massachusetts.

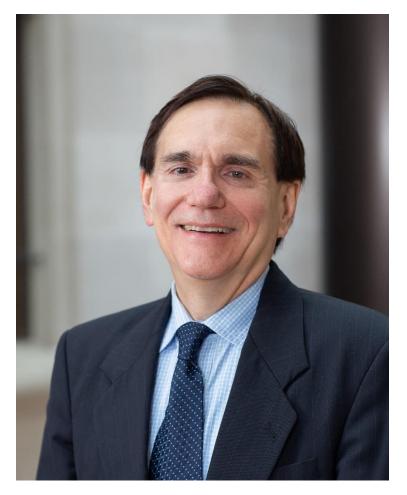


## Professor J. Clifton Fleming, Jr.

J. Clifton Fleming, Jr., Ernest L. Wilkinson Chair and professor of law, joined the BYU faculty in 1974. Fleming served as Associate Dean for Academic Affairs from 1986 to 1999 and as Associate Dean for Faculty and Curriculum from 1999 to 2004. He was appointed to the Wilkinson Chair in 1998. In 1985-86, he was Professor-in-Residence in the IRS Chief Counsel's Office in Washington, D.C.

Fleming's academic and teaching career has spanned the globe. He has been a Fulbright visiting professor of law at the University of Nairobi, and a visiting professor at the University of Queensland, Central European University in Budapest, Murdoch University School of Law in Perth, and holder of a visiting scholar chair at the University of Florida's law school. In 2011, he held the Fulbright Distinguished Chair at the Vienna University of Economics and Business, Vienna, Austria.

Professor Fleming teaches courses on US and international tax law, European Union law, and public international law.



## Professor Robert J Peroni

Professor Peroni currently holds the Fondren Foundation Centennial Chair for Faculty Excellence. He joined the Texas faculty in 2003 and his primary areas of teaching and scholarship are federal income taxation, international taxation, natural resource taxation, and professional responsibility/legal ethics. He is one of the nation's top scholars in international taxation and in energy taxation. He is a co-author of five books and has written many articles on taxation and professional responsibility topics. He has presented papers and given lectures throughout the world and has been a frequent teacher of tax law courses in the NYU/IRS Continuing Professional Education Program in Washington, D.C. In 2006, he was the recipient of the Texas Exes Faculty Teaching Award for excellence in teaching. He is the co-chair of the advisory boards for two recurring programs co-sponsored by the IRS the Biennial Parker Fielder Oil and Gas Tax Conference, co-sponsored by the IRS with the University of Texas School of Law, and the Annual Institute on Current Issues in International Taxation, co-sponsored by the IRS with the George Washington University Law School. During the 1985-86 academic year, he was a Professor-in-Residence in the Office of Chief Counsel of the IRS in Washington, D.C., and, during the 2000-2001 academic year, he was one of the Academic Advisors to the Joint Committee on Taxation's Study of the Overall State of the Federal Tax System. He has been active on several committees of the American Bar Association's Section of Taxation and has served as the Chair of the Taxation Section of the Association of American Law Schools. He is a Fellow of the American College of Tax Counsel.

Prior to joining the Texas faculty, Professor Peroni taught at the Tulane University School of Law in New Orleans, from 1981-1989, and at the George Washington University Law School in Washington, D.C., from 1989-2003, where he was the Robert Kramer Research Professor of Law. He was the first recipient of Tulane's Felix Frankfurter Distinguished Teaching Award, and he twice received G.W.'s Distinguished Faculty Service Award, selected by the vote of G.W. Law School graduating classes. He also has taught as a visiting professor on the law faculties of New York University, the

University of Texas, UCLA, the University of Pennsylvania, Northwestern University, and Georgetown University. He was the J. Landis Martin Visiting Professor of Law and Business at Northwestern during the 2002-03 academic year and is the Jack N. Pritzker Distinguished Visiting Professor of Law at Northwestern during the Fall 2006 semester. He was the Parker C. Fielder Regents Professor in Tax Law at the University of Texas from 2003-2005, and the James A. Elkins Centennial Chair in Law from 2005-2010.