

BRET WELLS

University of Houston Law Center
4604 Calhoun Road, Suite 124 TU-II
Houston, Texas 77204-6060
bwells@central.uh.edu

EDUCATION

Juris Doctorate, with Honors, The University of Texas School of Law
Honors & Activities Order of Coif
Review of Litigation Law Review
December 1989

B.B.A., Summa Cum Laude, Southwestern University (G.P.A. 3.97)
Honors: Outstanding Accountancy Award (Top Accounting Graduate)
May 1987

UNIVERSITY OF HOUSTON LAW CENTER

Professor of Law

George Butler Research Professor of Law

UH Energy Fellow

Associate Professor of Law

Assistant Professor of Law

Visiting Professor

September 2017 - Present
September 2016 - Present
September 2016 – August 2017
September 2014 to August 2016
January 2011 to September 2014
September 2010- December 2010

Awards: Order of the Barons “Professor of the Year” (2012-2013 & 2014-2015)
Provost Certificate of Excellence (2015)

Previous teaching experience as a Visiting Professor with the University of Houston Law Center from September 2010 to December 2010 and prior to that as an adjunct professor from 1999 to 2009. Courses taught are as follows:

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| Course: Federal Income Taxation, University of Houston Law Center | Fall 2010-2017 |
| Course: Texas Oil and Gas Law, University of Houston Law Center | Fall 2011-2017 |
| Course: U.S. International Taxation, University of Houston Law Center | Spring 2005, 2012, 2014, 2016 & 2018 |
| Course: Corporate Taxation, University of Houston Law Center | Spring 2013, 2015, 2017, 2018 |
| Course: Advanced Corporate Taxation, University of Houston Law Center | Spring 2009 & 2010 |
| Course: U.S. International Taxation, University of Minnesota School of Law | Fall 1999 |
| Course: Corporate Finance, University of Houston Law Center | Fall 2010; Summer 2011 |
| Course: Federal Income Tax Accounting, University of Houston Law Center | Fall 2008, Spring 2011 |
| Course: Taxation of Financial Products, University of Houston Law Center | Spring 2006 |

LAW REVIEW ARTICLES

TAX LAW

1. *Reform of Corporate Distributions in Subchapter C*, 37 VIRGINIA TAX REV. ____ (2018) (forthcoming)
2. *International Tax Reform By Means of Corporate Integration*, 20 FLORIDA TAX REV. 71 (2016)
3. *The Foreign Tax Credit War*, 2016 BYU L. REV. 1895 (2016)
4. *Revisiting §367(d): How Treasury Took the Bite Out of Section 367(d) and What Should Be Done About It*, 16 FLORIDA TAX REV. 519 (2014)
5. *Tax Base Erosion: Reformation of Section 482's Arm's Length Standard* 15 FLORIDA TAX REV. 737 (2014) (with C. Lowell)
6. *Pass-Through Entity Taxation: A Tempest in the Tax Reform Teapot*, 14 HOUS. BUS. & TAX L.J. 1 (2014)
7. *Income Tax Treaty Policy in the 21st Century: Residence vs. Source*, 5 COLUM. TAX J. 1 (2013) (with C. Lowell) republished in India in 10 INT'L TAX'N 181 (March 2014) (India).
8. *Territorial Taxation: Homeless Income is the Achilles Heel*, 12 HOUS. BUS. & TAX L.J. 1 (2012)
9. *Disposable Personal Goodwill, Frosty the Snowman, and Martin Ice Cream All Melt Away in the Bright Sunlight of Analysis*, 91 NEB. L. REV. 170 (2012) (with C. Bergez)
10. *Tax Base Erosion and Homeless Income: Collection at Source is the Linchpin*, 65 TAX L. REV. 535 (2012) (with C. Lowell)
11. *New Schedule UTP: Uncertain Tax Positions in the Age of Transparency*, 63 BAYLOR L. REV. 392 (2011), republished in 44 TEX. J. BUS. LAW 61 (2011)
12. *Economic Substance: How Codification Changes Decided Cases*, 10 FLORIDA TAX REV. 411 (2010)
13. *Voluntary Compliance: This Return Might Be Right But Probably Isn't*, 29 VIRGINIA TAX REV. 645 (2010)

OIL AND GAS LAW

1. *Allocation Wells: Lessor's Remedies for Multi-Tract Horizontal Wells Drilled Without Pooling Authority*, 68 BAYLOR L. REV. 1 (2016)
2. *The Dominant Mineral Estate in the Horizontal Well Context: Time to Extend Moser Horizontally*, 53 HOUS. L. REV. 193 (2015)
3. *Please Give Us One More Oil Boom – I Promise Not to Screw It Up This Time: The Broken Promise of Casinghead Gas Flaring in the Eagle Ford Shale*, 9 TEX. J. OIL, GAS & ENERGY LAW 319 (2014)

SCHOLARLY WRITINGS IN TAX PEER REVIEW JOURNALS

1. *Corporate Inversions and Whack-a-Mole Tax Policy*, 143 TAX NOTES 1429 (June 23, 2014)
2. *Cant and the Inconvenient Truth About Corporate Inversions*, 136 TAX NOTES 429 (July 23, 2012)
3. *What Corporate Inversions Teach Us About International Tax Reform*, 127 TAX NOTES 1345 (June 21, 2010)
4. *Adopting the More Likely Than Not Standard for Tax Returns*, 2010 TNT 82-10, Doc. 2010-7488 (April 29, 2010)

OPINION AND/OR PRACTITIONER PIECES

Tax Base Defense: History and Reality, 20 Int'l Transfer Pricing J. 72 (Mar.-Apr. 2013) (with C. Lowell)

Tax Base Defense: Time to Update the Model Treaties? 39 Int'l Tax J. 5 (Jan.-Feb. 2013) (with C. Lowell), republished at Global Tax Weekly, Feb. 7, 2013, at 43.

PUBLIC INTEREST WRITING PRIOR TO JOINING UHLC FACULTY

Comment Letter: Proposed Change to §901 Definition of Foreign Tax, 2007 TNT 160-10, Doc 2007-18951

Comment Letter: Proposed Change to Definition of Highway Vehicle, 2003 TNT 11-27, Doc. 2003-554

Tax-Effective Methods to Finance Latin American Operations, 28 INT'L TAX J. 21 (2002)

Interest Allocation: The Dog Days of Summer, 53 TAX EXECUTIVE 365 (2001)

Interest Allocation: A Regime in Desperate Need of Sound Policy, 53 TAX LAW. 859 (2000)

Tax Consequences of Participations in International Trade Finance, 13 TAX NOTES INT'L 1883 (1996)

PUBLIC INTEREST TESTIMONY

Expert Witness Testimony before the Senate finance Committee Hearing on Business Tax Reform (October 3, 2017)

Expert Witness Testimony before the Senate finance Committee Hearing on Integrating the Corporate and Individual Tax Systems: The Dividends Paid Deduction Considered (May 17, 2016)

Expert Witness Testimony before the Senate Permanent Subcommittee on Investigations at the hearing on “Offshore Profit Shifting and the U.S. Tax Code—Part 3 (Caterpillar)” (April 1, 2014)

Expert Witness Testimony (by invitation) to the staff of the Senate Finance Committee as part of an Academic Roundtable discussion on fundamental tax reform (January 5-6, 2012)

Expert Witness Testimony (by invitation) to the U.S. House Committee on Ways and Means Subcommittee on Select Revenue Measures on Tax Reform and Investment in the United States (June 23, 2011)

Prepared Testimony to the Internal Revenue Service on Proposed Regulations, 67 F.R. 38,913, Washington, D.C. (February 27, 2003)

PUBLIC SPEAKING

2018

Presentation on Reform of Section 355 to the Houston Tax Roundtable (May 9, 2018)

Presentation on Permanent Establishment Issues to the Houston Bar Association Tax Section (April 18, 2018)

Presentation on Inbound Excise Tax to Prevent Base Erosion at the 42nd Annual Tax Law Conference hosted by the Federal Bar Association in Washington, D.C. (March 9, 2018)

Presentation on Recent Developments in Oil and Gas Law to the Institute for Energy Law's Annual Oil and Gas Conference in Houston, Texas (February 15, 2018)

Presentation on Oil and Gas Taxation at the IFA USA Branch Annual Meeting held in Houston (February __, 2018)

2017

Presentation on Permanent Establishment Issues to 20th Annual International Tax Symposium for the Tax Section of the State Bar of Texas (in Dallas on November 2) (in Houston on November 3)

Presentation on Business Tax Reform to the Young IFA Network of Houston (October 10, 2017)

Presentation of my paper entitled “Abandoned But Not Forgotten: Improperly Plugged and Orphaned Wells May Pose Serious Concerns for Shale Development at the Colloquium on Environmental Law Scholarship at Vermont Law School (September 23, 2017)

Presentation of Panelist on Current US and Mexican Cross-Border Tax Issues at the ABA Tax Section Fall Meeting in Austin, Texas (September 14, 2017)

Panelist on Tax Analysts webcast hosted by Vinson & Elkins in Houston entitled “Tax Reform: Perspectives From Across the Nation” (June 21, 2017)

Lectured on two sessions on Federal Income Taxation and one session on Oil & Gas Law to the UHLC Pre-Law Pipeline Program (June 12, 2017)

Organized the 3rd Annual Texas Tax Faculty Workshop hosted by the University of Houston Law Center (May 19, 2017)

Presentation on “Allocation Wells” at the 4th Annual GDHM Land & Mineral Owner Seminar in Austin, Texas (May 12, 2017)

Presentation on “Section 385 Traps and Pitfalls” to the Austin Tax Study Group (February 21, 2016)

Presentation on “Section 385 Traps and Pitfalls” at the Tax Section of the Houston Bar Association (February 16, 2017)

Presentation on “Texas Oil and Gas Law” to the Houston Business and Tax Law Journal’s Annual Symposium (February 10, 2016)

Panel Discussion on Allocation Wells, Oil, Gas & Energy Resources Law Section of the State Bar of Texas, Oil and Gas Disputes Course (January 27, 2017)

2016

Presentation on “Section 385 Traps and Pitfalls” at the Wednesday Tax Forum (December 13, 2016)

Presentation on “Section 385 Traps and Pitfalls” at the International Tax Forum of Houston (December 1, 2016)

Presentation on “Section 385 Traps and Pitfalls” at the 64th Annual Taxation Conference, University of Texas, Austin, Texas (November 30, 2016)

Presentation on “Section 385 Traps and Pitfalls” at the 19th Annual International Tax Symposium for the State Bar of Texas (in Dallas on November 3) (in Houston on November 4)

Presentation of my paper entitled “*International Tax Reform By Means of Corporate Integration*” to the International Tax Symposium hosted by the University of Florida Levin College of Law (October 28, 2016)

Lectured on two sessions on Federal Income Taxation and one session on Oil & Gas Law to the UHLC Pre-Law Pipeline Program (June 13, 2016)

Presentation of my paper entitled “*International Tax Reform By Means of Corporate Integration*” to the Wednesday Tax Forum (May 24, 2016)

Presentation of my paper entitled “*International Tax Reform By Means of Corporate Integration*” to the Texas Tax Faculty Workshop hosted by SMU Law School (May 20, 2016)

Presentation of my paper entitled “*International Tax Reform By Means of Corporate Integration*” to the Houston Tax Roundtable (May 11, 2016)

Presentation of my paper entitled “*International Tax Reform By Means of Corporate Integration*” to the International Tax Forum (May 5, 2016)

Presentation on “International Tax Update” to the Tax Executive Institute (May 5, 2016)

Presentation of my paper entitled “*Allocation Wells: Lessor’s Remedies for Multi-Tract Horizontal Wells Drilled Without Pooling Authority*” to the Baylor Law Review Annual Symposium (April 7, 2016)

Presenter of my paper entitled “The Foreign Tax Credit War” to the BYU Law Review Symposium on International Taxation (March 11, 2016)

Presentation on Offset Well Clauses and Allocation Wells in the Horizontal Shale Development Context, UHLC EENR Speaker Series (March 4, 2016)

Presentation on “Texas Oil and Gas Law” to the Houston Business and Tax Law Journal’s Annual Symposium (February 26, 2016)

Panelist to discuss “Foreign Tax Credit Developments” at the 2016 IFA USA Annual Conference in Miami, Florida (February 25, 2016)

Presentation on “International Tax Update” to the Tax Section of the Houston Bar Association (February 17, 2016)

2015

Panel Member on Oil and Gas Taxation at the Parker Fielder Oil and Gas Tax Conference (November 19, 2015)

Presentation on “Revisiting Section 367(d)” at the 18th Annual International Tax Symposium for the State Bar of Texas (Dallas on November 12; Houston on November 13).

Commentator at the Invitational Tax Conference hosted by the University of Virginia Law School (November 6-7, 2015)

Presentation on “Status of Business Tax Reform” to the 33rd Annual Advanced Tax Law Symposium of the State Bar of Texas (October 30, 2015)

Presentation entitled “The Foreign Tax Credit War” to the ExxonMobil Tax Department Lunch & Learn (October 9, 2015)

Presentation entitled “The Foreign Tax Credit War” to the International Tax Forum of Houston (October 1, 2015)

Lecture on Federal Income Taxation to the UHLC Pre-Law Pipeline Program (June 4, 2015)

Presenter of “The Foreign Tax Credit War” to the Texas Tax Faculty Workshop hosted by the UT Law School (June 3, 2015)

Presentation: “Revisiting §367(d) in Light of IP Migration Strategies: How Treasury Took the Bite Out of §367(d) and What Should be Done About It” to the Houston Business and Tax Law Journal’s Annual Symposium (April 16, 2015)

Presentation on “Corporate Inversions” to the SMU Tax Colloquium Speaker Series (March 3, 2015)

Presentation entitled “Update on Corporate Inversions” to the Houston Bar Association (February 18, 2015)

Panelist Member, “US Tax Treaty Issues,” Diversity Committee of the ABA Tax Section (January 31, 2015)

Moderator for Panel Discussion on International Taxation at the Andrews Kurth National Moot Court National Championship (January 22, 2015)

2014

One-Day Training Course on US Inbound International Taxation as part of the UHLC Advanced Legal Studies Program for Petrobras (December 9, 2014)

Presentation entitled “Corporate Inversions: What These Transactions Tell Us About Profit-Shifting and US International Tax Reform” to a joint meeting of the Houston Journal of International Law and Corporate and Tax Law Society (November 20, 2014)

Presentation on “Corporate Inversions” to the Houston Tax Roundtable (November 12, 2014)

Presented paper entitled “Revisiting §367(d): How Treasury Took the Bite Out of §367(d) and What Should Be Done About It,” as part of the Georgetown Law School’s Graduate Tax Program’s Speaker Series (November 6, 2014)

Presentation on “Revisiting Corporate Inversions” before IFA/ITF (October 3, 2014)

Invited Panelist to discuss “Corporate Inversions,” International Tax Policy Forum, Washington, D.C. (September 12, 2014)

Presentation on Tax Base Erosion: Reformation of Section 482’s Arm’s Length Standard at the Houston International Tax Forum (May 1, 2014)

Presentation on Tax Base Erosion: Reformation of Section 482’s Arm’s Length Standard as part of the Advanced Topics in Taxation Series, Northwestern University School of Law (April 3, 2014)

Conference Director for the first Federal Income Tax Update conference hosted by University of Houston Law Center (February 21, 2014)

Presentation on Base Erosion & Profit Shifting, Houston Bar Association (February 19, 2014)

Panel Moderator and Presentation on the OECD’S Initiative to Combat Base Erosion & Profit Shifting, International Fiscal Association (February 5, 2014).

2013

Presentation on Ethical Issues Related to Tax Opinions, Houston Bar Association (October 16, 2013)

Presentation on Ethical Issues Related to Tax Opinions, Wednesday Tax Forum (October 15, 2013)

Presentation on Ethical Issues Related to Tax Opinions, the Tax LLM Alumni Reunion (October 11, 2013)

Presentation on Tax Planning Implications from Small Business Tax Reform, Wednesday Tax Forum (September 17, 2013)

Presentation on State of Tax Reform, 30th Annual Advanced Tax Law Conference, Tax Section of the State Bar of Texas (August 15, 2013)

One-Day Training Course on US Inbound International Taxation as part of the UHLC Advanced Legal Studies Program for Petrobras (August 9, 2012)

University of Virginia School of Law, Virginia Tax Study Group Meeting: Panel Discussion of Corporate Inversions (March 22, 2013). Fellow panel participants included Hal Hicks (partner of Skadden Arps), Williard Taylor (partner of Sullivan & Cromwell), David Lenter (Legislative Counsel for Joint Committee on Taxation). My paper on Corporate Inversions was presented as part of the conference materials.

Presentation to the International Tax Forum entitled “Implications of a Territorial Tax Regime for the United States” (February 7, 2013)

Presentation to the Greater Houston Partnership entitled “Implications for Small Business of Business Tax Reform” as part of the University of Houston Law Center Legal Excellence Series (January 29, 2013)

Presentation to the Wednesday Tax Forum entitled: “Nothing Certain Except More Debt and Taxes” (January 15, 2013)

2012

One-Day Training Course on US Inbound International Taxation as part of the UHLC Advanced Legal Studies Program for Petrobras (December 14, 2012)

Presentation on Disposable Personal Goodwill in the Closely-Held Corporate Context, 29th Annual Advanced Tax Law Conference, Tax Section of the State Bar of Texas (August 17, 2012)

Intensive Short Course (20 hours) covering US inbound and outbound taxation issues as part of the UHLC Advanced Legal Studies Program for Sonangol (July 2-9, 2012)

One-Day Training Course on US Inbound International Taxation as part of the UHLC Advanced Legal Studies Program for Petrobras (June 29, 2012)

Presentation on the Codification of the Economic Substance Doctrine to the Exxon Tax Department Lunch & Learn (April 12, 2012)

Presented paper entitled "Territorial Taxation: Homeless Income is the Achilles Heel" to the Annual Symposium sponsored by the Houston Business & Tax Law Journal (March 7, 2012).

Co-presented paper entitled "Disposable Personal Goodwill, Frosty the Snowman, and Martin Ice Cream All Melt Away in the Bright Sunlight of Analysis" to the Wednesday Tax Forum (February 28, 2012).

Co-speaker in series of Webcasts for Thomson Reuters ONESOURCE® on The Obama Administration and Transfer Pricing Evolutions. The first webcast was entitled "International Tax Reform: History, Current Needs, and the Obama Administration Proposals" (December 6 & 7). The second webcast was entitled the "Territorial Proposal of Chairman Camp of the House Ways & Means Committee (January 24 & 25). The third webcast was entitled "Planning Considerations for U.S. and Foreign-based Groups" (February 15 & 16).

Presentation to the Houston Bar Association: "Codification of the Economic Substance Doctrine" (January 18, 2012)

2011

Presiding Officer for the 59th Annual Taxation Conference, University of Texas, Austin, Texas (December 7, 2011)

Presentation to the Houston Tax Roundtable: "Codification of the Economic Substance Doctrine" (November 9, 2011)

Presented paper on "Homeless Income: Collection at Source is the Linchpin" at the American Tax Policy Institute Conference on International Taxation and Competitiveness in Washington, D.C. (October 17, 2011).

Presentation entitled "Codification of the Economic Substance Doctrine—What Does It Mean?" to the 28th Annual Advanced Corporate Tax Course sponsored by the Taxation Section of the State Bar of Texas (August 19, 2011)

Presentation to the Wednesday Tax Forum: "A VAT Regime in the United States?" (July 26, 2011)

Intensive Short Course (20 hours) covering US inbound and outbound taxation issues as part of the UHLC Advanced Legal Studies Program for Sonangol (July 6-8 and 11-15)

Presentation as part of a Legal Ethics Seminar to the Tax Executive Institute on Ethical and Legal Issues: "Taking Uncertain Tax Positions" (June 14, 2011)

Presentation to the Wednesday Tax Forum: "Codification of the Economic Substance Doctrine," (April 19, 2011)

Presentation to the Wednesday Tax Forum: "Schedule UTP: Uncertain Tax Positions in the Age of Transparency," (March 29, 2011)

Presentation to the International Tax Forum: "What Corporate Inversions Teach Us About U.S. International Tax Reform," (March 3, 2011)

Presentation to the Council for International Tax Education: "Outbound Transfers Under Section 367(a) and Section 367(d)," Houston, Texas (January 26, 2011)

2010

Chairman for Panel Discussion: "*The Real Angel's List: Transactions to Which the Economic Substance Doctrine Does and Does Not Apply*," 58th Annual Taxation Conference, University of Texas, Austin, Texas (December 9, 2010)

Presentation to the Tax Section of the Houston Bar Association: "*Ethical Issues with Taking Uncertain Tax Positions on a Tax Return*" Houston, Texas (September 22, 2010)

Pre-2010

Presentation at the ATLAS TAX CONFERENCE: *Direct and Indirect Foreign US Tax Credits*,” Houston, Texas (November 11, 2003)

Panel discussion on US International Tax Policy with US Treasury International Tax Counsel at the 30th Annual Conference of the US Branch of the International Fiscal Association, Washington D.C. (March 12, 2002)

SERVICE TO MEDIA (Quoted as a Significant Source; Excludes Republication)

1. Joe Nocera, “Don’t Fix the Senate’s Tax Goof. It’s a Great Ideal!” Bloomberg News (Dec. 6, 2017)
2. Lynnley Browning, “Senate’s ‘Unpleasant Surprise’ Hurts Tax Breaks for Tech, Others,” 232 Daily Tax Report G-6 (Dec. 5, 2017)
3. Mindy Herzfeld, “International Tax Changes: Too Late For Debate?” 2017 W.T.D. 232-1 (Dec. 5, 2017)
4. Lynnley Browning, “‘Future Tax Traps’ Lurk for Multinationals in Senate’s Proposal,” Bloomberg (Nov. 22, 2017)
5. Lynnley Browning, “Senate GOP Tucks Future ‘Traps’ for Multinationals Into Tax Bill,” Bloomberg (Nov. 22, 2017)
6. Alison Bennett, “Tough Balance for Base Erosion in Territorial Tax Plans,” 224 Daily Tax Report G-2 (Nov. 22, 2017)
7. Emily L. Foster and Andrew Velarde, “Hatch Suggests 12.5 Percent Dividends Paid Deduction for 5 Years,” 2017 TNT 220-3 (Nov. 15, 2017)
8. Lynnley Browning, “Senate’s Offshore Tax Ideas Could Be a ‘Goldmine’ for Some Companies,” Bloomberg (Nov. 14, 2017)
9. Alan Ota, “Senate GOP’s Treatment of Intangible Property Gets Mixed Review,” Congressional Quarterly (Nov. 13, 2017)
10. Barney Jopson, “US tax reform changes fails to quell outcry,” Financial Times (Nov. 7, 2017)
11. Marie Sapirie, “Passthroughs Get 25 Percent Rate Under Brady Bill,” 157 TAX NOTES 734 (Nov. 6, 2017)
12. Andrew Velarde, “Territoriality, Base Erosion at Center of International Tax Reforms,” 88 Tax Notes Int’l 497 (Nov. 6, 2017)
13. Brian Faller, “House GOP plots crackdown on corporate tax dodges,” Politico (Nov. 5, 2017), available at <https://www.politico.com/story/2017/11/06/house-gop-reform-corporate-tax-avoidance-244591>.
14. Barney Jopson, “Guide to the key points of Republican tax plan,” Financial Times (Nov. 3, 2017), available at <https://www.ft.com/content/49e0743c-bff4-11e7-9836-b25f8adaa111>.
15. Barney Jopson, “US tax reform targets avoidance by multinationals,” Financial Times (Nov. 3, 2017), available at <https://www.ft.com/content/23060b2c-c037-11e7-9836-b25f8adaa111>.
16. Lynnley Browning, “Tax Bill Takes Extra Bite of Apple and Other Global Companies,” Bloomberg (Nov. 3, 2017), available at <https://www.bloomberg.com/news/articles/2017-11-03/multinationals-may-take-a-hit-from-trio-of-taxes-in-house-bill>.
17. Bret Wells Op-Ed, “Corporate offshoring a symptom of earning-stripping disease,” Hill.com (October 30, 2017), available at <http://thehill.com/opinion/finance/357834-corporate-offshoring-the-result-of-earnings-stripping-disease>.
18. Vidya Kauri, “Federal Cooffers Vulnerable Under Global Minimum Tax Plan,” Law360 (October 23, 2017), available at <https://www.law360.com/articles/976616/federal-cooffers-vulnerable-under-global-minimum-tax-plan>
19. Amanda Athanasiou, “U.S. Insurer to Merge Under Bermuda Parent,” 2017 W.T.D. 202-7 (October 20, 2017).
20. Richard Rubin, “Changes in Store for Foreign Companies’ Tax Treatment in U.S.,” Wall Street Journal (Oct. 19, 2017), available at <https://www.wsj.com/articles/changes-in-store-for-foreign-companies-tax-treatment-in-u-s-1508405404>.
21. Mindy Herzfeld, “Taxing Inbound Sales,” 88 TAX NOTES INT’L 203 (Oct. 16, 2017)
22. Patricia Cohen, “U.S. Corporate Tax Shake-Up Could Fuel Tensions With Allies,” New York Times (Oct. 13, 2017), available at <https://mobile.nytimes.com/2017/10/13/business/economy/corporate-tax.html>.
23. Sam Olchyk, Kiley Boland, “US professors advocate international tax reform,” MNETax.com (Oct. 4, 2017), available at <https://mnetax.com/us-professors-advocate-international-tax-reform-senate-finance-panel-23886>.
24. Andrew Velarde, “Wyden Accuses Republicans of Dodging Score on U.S. Tax Reform,” 2017 TNT 191-2 (Oct. 4, 2017)
25. Lynnley Browning, “U.S. Needs to Join the Race for Multinationals’ Tax Revenue, Experts Say,” Bloomberg Politics (October 4, 2017), available at <https://www.bloomberg.com/news/articles/2017-10-04/eu-crackdown-on-amazon-and-apple-feeds-u-s-tax-overhaul-urgency>.
26. Colleen Murphy, “Parties Still Divided on International Tax Changes,” 191 Daily Tax Report G-2 (Oct. 4, 2017)
27. Catherine Traywick, “These Suburbanites May Have No Fracking Choice,” Bloomberg Businessweek (October 3, 2017)
28. Andrew Velarde, “Can Corporate Integration Jump From Understudy to Center Stage?,” 156 Tax Notes 1348 (Sept. 11, 2017)
29. Andrew Velarde, “Senate Continues to ‘Tweak’ Corporate Integration Plan,” 2017 TNT 132-2 (July 12, 2017)
30. Alex Parker, “Global Minimum Tax Re-Emerges in U.S. Tax Reform Debate,” 26 BNA Transfer Pricing Report 1 (July 13, 2017)
31. Jonathan Curry, “Energy Sector Faces Uncertainty Under Tax Reform, Panelists Say,” 2017 TNT 119-4, Doc. 2017-59114 (June 22, 2017)
32. Lydia DePilllis, “Who are the winners and losers in Trump’s tax plan?,” Houston Chronicle (April 28, 2017), available at <http://www.houstonchronicle.com/business/texanomics/article/Winners-and-losers-in-Trump-s-tax-plan-11105905.php>.
33. Jennifer Hiller, “Dark Skies and the Permian Oil Boom,” San Antonio Express News (April 22, 2017), available at <http://www.expressnews.com/business/article/Oil-field-flares-and-lights-creeping-closer-to-11091773.php?cmpid=email-premium>.
34. Adriene Hill, “Corporate inversion rules go back on the table,” Bloomberg Marketplace Report (April 21, 2017), available at <https://www.marketplace.org/shows/marketplace>.

35. Alex Parker, "GOP Tax Overhaul Could Throw U.S. Tax Treaties Into Question," 22 Daily Tax Report G-5 (Feb. 3, 2017)
36. Bret Wells, "Is Flaring Just Bad For Business, Or Is It A Violation Of The Landowner's Contract?" Forbes.com (October 3, 2016), available at <http://www.forbes.com/sites/uhenergy/2016/10/03/is-flaring-just-bad-for-business-or-is-it-a-violation-of-the-landowners-contract/#710c34f97a1d>
37. Bret Wells, "Flaring in the Eagle Ford and Rule 32," Forbes.com (Aug. 25, 2016), available at <http://www.forbes.com/sites/uhenergy/2016/08/25/flaring-in-the-eagle-ford-shale-and-rule-32/#162aa5737352>
38. John Austin, "Fracking and flaring heat railroad commission race," CHHI (Sept. 19, 2016)
39. Alison Bennett, "Inversion Lawsuit Could Change Tax Regulation Landscape," 162 Daily Tax Report G-5 (August 22, 2016)
40. Alan Kovski, "Tax Provisions Helping Oil and Gas Firms Take Much Criticism but Keep Paying Off," 16 Daily Environment Report B-2 (July 15, 2016)
41. Richard Rubin, "Big Banks Warn Tax Proposal on Internal Debt Could Make Industry 'More Fragile'," Wall Street Journal (July 13, 2016)
42. "Law professors rip into Tax Court's *Altera* opinion, urge 9th Circuit to reverse," RIA Weekly Tax Alert (July 11, 2016)
43. Delores Gregory, "Comparables Argument in 'Altera' Flawed, Law Professors Say," 129 Daily Tax Report K-1 (July 6, 2016)
44. Andrea Rumbaugh, "Cardtronics could up U.K. presence on heels of Brexit," Houston Chronical (June 27, 2016)
45. Alex Parker, "As U.S. Works to Curb Inversions, Talk of 'Pre-Inverting'," 123 Daily Tax Report G-1 (June 24, 2016)
46. Andrew Velarde, "Retirement Plan Concerns Dominate Corporate Integration Hearing," 2016 TNT 96-2 (May 18, 2016)
47. Aaron E. Lorenzo, "Hatch Pushes Corporate Integration Despite Revenue Concerns," 96 Daily Tax Report G-7 (May 17, 2016)
48. Michael Cohn, "Senate Mulls Corporations to Deduct Dividends," Accounting Today (May 17, 2016)
49. Naomi Jagoda, "Hatch touts benefits of deduction for dividends," The Hill (May 17, 2016)
50. John Hintze, "Here's How New Regulations Deter Corporate Inversions," Ass'n for Fin. Prof., Accounting Today (May 11, 2016)
51. Lynnley Browning, "Coke Bottler's Merger Might Lose Tax Perks to Inversion Rules," Bloomberg News (May 4, 2016).
52. Amanda Athanasiou, "Who's Afraid of Anti-Inversion Rules?," 82 Tax Notes Int'l 426 (May 2, 2016)
53. John Hintz, "Corproates engaged in common intercompany lending may see more documentation demands," Ass'n for Fin. Prof., Accounting Today (April 29, 2016)
54. Andrea Rumbaugh, "Cardtronics sees tax advantage in UK incorporation move," Houston Chronicle (April 27, 2016)
55. Lynnley Browning, "Beyond Foiling Pfizer, U.S. Aims at Intra-Company Loans 'Fiction'," Bloomberg News (April 11, 2016)
56. Alison Bennett, "Inversion Guidance Could Pull in Common Deals," 35 TMWR 435 (April 11, 2016)
57. Tom Murphy, "Experts expect corporate tax inversions to survive new rules," Associated Press (April 6, 2016)
58. David Wethe, "Oil-Rich University Aims to Unlock More Wealth From Shale Acres," Bloomberg News (April 6, 2016)
59. Andrew Velarde & Amanda Athanasiou, "US Debt-Equity Reclassification Regs Usher In a Brave New World," 2016 TNT 66-1 (April 6, 2016)
60. Amy S. Elliott & Amanda Athanasiou, "Temp U.S. Inversion Regs Go Further Than Notices, May Derail Pfizer," 2016 TNT 66-2 (April 6, 2016)
61. Alison Bennett & Kaustuv Basu, "Inversion Rules Won't Stop Some Kinds of Deals," 67 Daily Tax Report G-5 (April 6, 2016)
62. Barney Jopson, "US crackdown on inversions came 'out of left field'," Financial Times (April 5, 2016)
63. Alison Bennett, "Inversion Guidance Could Pull in Common Deals," 35 Tax Mgmt. Weekly Review 439 (April 5, 2016)
64. L. M. Sixel, "Energy slowdown could lead to strife over royalties," Houston Chronicle (April 4, 2016)
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AFFILIATIONS AND SERVICE ACTIVITIES TO PROFESSIONAL ORGANIZATIONS

Admitted to the State Bar of Texas (since 1990)

Licensed as a Certified Public Accountant by the Texas State Board of Public Accountancy (since 1992)

Official Observer to the United Nations Committee of Experts on International Cooperation in Tax Matters
 State Bar of Texas
 Law School Representative to the Tax Section Council for the State Bar of Texas (2017 to Present)
 Houston Bar Association, Tax Section
 Member of Planning Council (2011 to present)
 Houston International Tax Forum
 Member of Board of Directors (2011 to present)
 Planning Committee for the University of Texas Annual Taxation Conference (2011 to Present)
 Presiding Officer for 2012 Conference
 American Bar Association, Tax Section
 International Fiscal Association, Tax Section
 American Tax Policy Institute
 American College of Tax Counsel
 Wednesday Tax Forum
 Houston Tax Roundtable

PROFESSIONAL WORK EXPERIENCE

Vice President-Treasurer & Chief Tax Officer, BJ Services Company February 2002 to April 30, 2010

BJ Services was a leading provider of pressure pumping and other oilfield services to the petroleum industry with \$5 billion in revenue. BJ Services has 18,000 employees located in 50 countries. My responsibilities included overall management of the company's Risk Department, Credit Department, Treasury Department, and Tax Department on a worldwide basis. I reported to the Chief Financial Officer. In this role, I also served as the company's key contact for rating agencies, insurance underwriters, relationship banks, and tax authorities. My role prior to my last position was the position of Tax Director for the company.

Assistant Vice President and Asst. General Tax Counsel, Cargill, Inc. June 1993 to September 2001

Cargill is an international marketer, processor and distributor of agricultural, food, financial and industrial products and services with 159,000 employees in 68 countries and \$116 billion in sales. In my position with the company, I was the primary tax advisor responsible for overseeing a 30-person group of tax professionals who provided advice and tax support to Cargill's Latin American based commodity trading, processing, and financial businesses. Prior roles included an overseas assignment in Singapore where I was responsible for both the US and non-US tax advice related to Cargill's trading, processing, and financial businesses in Asia and Australia. I was awarded the CFO's Award for Financial Excellence (1998 and 1999) and the Chairman's Broken Silo Award for Teamwork (1998).

Associate Attorney, Baker & Botts, L.L.P.

April 1990 to June 1993

Baker & Botts is an international law firm with approximately 800 lawyers worldwide. My practice included providing U.S. federal income tax advice on corporate, partnership, and general income tax issues.