

Itai Grinberg

Professor of Law, Georgetown University Law Center

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PROFESSIONAL EXPERIENCE

Georgetown University Law Center, Washington, DC

(August 2011 – Present)

Professor of Law

Principal areas of research and teaching include federal income tax, international tax, tax and public finance, and taxation and development. Research centers on fundamental tax reform, international tax policy, and international economic governance, especially the relationship between the international tax regime and other areas of international economic law.

Organisation for Economic Cooperation and Development (OECD)

(2014-2015)

Senior Academic Advisor, Member of the Informal Group of Experts on the Multilateral Instrument: Member of an international group of academic experts set up by the Committee on Fiscal Affairs (the body that brings together the senior international tax official of each of the member countries of the OECD) to advise on the feasibility of a multilateral instrument to implement BEPS measures. Acted as lead author for the OECD's 2014 Report to the G-20 Finance Ministers' Meeting in Cairns *Developing a Multilateral Instrument to Modify Bilateral Tax Treaties*.

United States Treasury Department, Washington, DC

(2007 – 2011)

Attorney-Advisor: Provided legal and policy advice to the Assistant Secretary of the Treasury for Tax Policy and the International Tax Counsel of the United States with respect to international tax issues involving tax legislation, tax treaties, multilateral negotiations regarding international tax matters, and tax regulatory guidance.

- Represented the United States at the Committee on Fiscal Affairs of the OECD, the Global Forum on Transparency and Information Exchange, and the OECD's Task Force on Tax and Development. Advised the Treasury's Office of International Affairs and the White House on issues related to offshore tax evasion and tax and development in connection with G-8 and G-20 meetings.
- Advised senior Treasury officials and consulted with Congressional staffs on tax legislative matters. Led Treasury efforts on the enactment of the Foreign Account Tax Compliance Act (FATCA).
- Negotiated tax treaties between the United States and foreign sovereigns.
- Formulated and drafted tax regulations and other tax guidance in the international tax area. Notable guidance projects included all FATCA guidance and contract manufacturing regulations under Section 954 of the Internal Revenue Code.

President's Advisory Panel on Federal Tax Reform, Washington, DC (2005)

Counsel: Advised a bipartisan presidential commission composed of former U.S. Senators and leading public finance experts and businesspersons.

- Analyzed and briefed panelists on a wide variety of tax policy issues including the taxation of cross-border transactions and multinational corporations, consumption tax issues, tax incentives for savings and investment, and lower-income labor incentives and tax relief.
- Drafted chapters of a report to the Secretary of the Treasury proposing sweeping changes to the U.S. tax code.

Skadden, Arps, Slate, Meagher & Flom LLP, Washington, DC (2002 – 2005, 2006 – 2007)

Associate: Provided legal advice on tax aspects of transactions, controversies, regulatory matters, and legislation.

- Represented clients in international tax controversies and on regulatory issues of industry-wide significance in administrative proceedings before the Internal Revenue Service and the U.S. Treasury Department. Drafted Congressional testimony and analyzed tax reform and Social Security reform developments for senior corporate leadership in the finance, insurance, energy, investment management, and pharmaceutical industries.
- Advised leading multinational corporations on international tax transactional and non-transactional planning matters.
- Negotiated tax issues in transactional matters.

EDUCATION

Yale Law School, New Haven, CT

J.D., June 2002.

Amherst College, Amherst, MA

B.A. in Economics and Political Science, *magna cum laude*, Phi Beta Kappa, May 1997.

SCHOLARSHIP AND OTHER WRITING

- Numerous book chapters, academic articles, and editorials focused on a wide range of questions in international corporate taxation and with respect to fundamental tax reform. Selected works include: *The Battle Over Taxing Offshore Accounts*, 60 UCLA Law Review 304 (2012); *Taxing Capital Income in Emerging Countries: Will FATCA Open the Door*, 5 World Tax Journal 325 (October 2013); *The New International Tax Diplomacy*, 104 Geo. L.J. 1137-1196 (2016); *Macroeconomic Modeling of Tax Policy: A Comparison of Current Methodologies*, 70 National Tax Journal 819, December 2017; *Design of Scope Limitations for OECD Pillar 1 Work*, Tax Notes (June 15, 2020).
- Legislative testimony in the German Bundestag, the United States House of Representatives, and the United States Senate.