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**Alan** is a tax lawyer with more than 50 years of experience in the area of international taxation. He advises MNEs and private clients on cross-border planning, transfer pricing, compliance, controversy and transparency initiatives.

He is a former International Tax Counsel and Director, Office of International Tax Affairs of the U.S. Department of the Treasury, and a Fellow of the American College of Tax Counsel.



**Joshua David Odintz**  
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**Josh** focuses on tax policy, tax controversy and withholding tax matters. He also advises clients on domestic and international tax controversy matters at all phases, from audit and administrative appeals, through litigation. Mr. Odintz also has experience handling cases involving transfer pricing, methods of accounting, Section 199, research credit, tax accounting, privilege and work product, among others.

Josh has held high-level government positions with the U.S. Department of the Treasury and the Senate Committee on Finance.

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