

2020 ITC Online Exec Program in International Tax Law -- for Brazil, Portugal & Angola

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Course C: Transfer Pricing– Overview teachers



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Dinis is a senior associate in the Transactional and International Tax team at PLMJ (Portugal). He focuses in international tax structuring operations, corporate reorganisations, mergers and acquisitions and financial transactions. He holds a Masters in EU Tax Law from the University of Lisbon and Adv. LLM in International Tax from ITC Leiden (2016). Dinis is a guest lecturer in EU Tax Law and Transfer Pricing at ITC Leiden and is responsible for Corporate Income Tax course at Catholic University (Lisbon, Portugal). He is an associate of the CIDEEFF - Centre for Research into European, Economic, Financial and Tax Law of the Faculty of Law of the University of Lisbon.



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Alexandre is an experienced tax professional involved in relevant Brazilian transfer pricing cases, having taught transfer pricing in prominent tax schools in Brazil. He holds an LLM degree in International Taxation from the ITC Leiden. Alexandre is the chairman of the tax committee of AMCHAM and partner at Lobo de Rizzo Advogados.



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Dalton Hirata obtained his law and master degrees with the highest distinctions from Fundação Getulio Vargas (2010 and 2012). He received his Advanced International Tax Law master degree (*cum laude*) from the ITC Leiden (2017), where he also served as a Teaching Assistant to Prof. Kees van Raad. Dalton has over ten years of experience as a tax lawyer and currently heads the Corporate Tax department of a multinational company. His academic interests focus on international tax issues, mostly related to tax treaties' interpretation and the interaction between different tax legislations.



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Igor is an all-around transfer pricing specialist with extensive experience spanning more than 16 years, including 1.5 years in Europe (Zürich and Düsseldorf), while he was working with a Big 4 firm. He has advised taxpayers on all aspects of transfer pricing, including planning, documentation, and litigation. One of his major assets is his extensive experience advising multinational corporations on aligning the Brazilian requirements with the international standard. Igor has a bachelor's degree at Law and an LLM in Law & Economics).



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Mariana is currently a senior associate in the tax area of Garrigues (in Portugal) with 13 years of experience in transfer pricing. She holds a Degree and a Master in Economics from Nova School of Business and Economics, as well as a Degree in Law from University of Lisbon. She works on transfer pricing documentation, in supporting corporate reorganizations, changing and optimizing value chains, designing of intragroup operations and negotiating advanced transfer pricing agreements (“APA”) in Portugal. She also follows several litigation processes in the same area, on which frequently writes opinion articles. Her experience extends to Angolan and Mozambican jurisdictions.



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Leendert Verschoor is a partner of PwC Portugal since 2008 and counts more than 25 years of experience in international taxation of multinational companies. He leads the PwC Transfer Pricing Services Group in Portugal, Angola and Cape Verde and is representing Portugal within PwC’s Global Transfer pricing Network. Leendert has a degree in Tax Law from the University of Leiden and a degree in Business Economics from Erasmus University Rotterdam. He is the author of several publications, including the Portuguese chapters in the books “International Transfer pricing”, “Mastering the IP Life Cycle” and “Substance, Aligning international tax planning with today's business realities”.



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Luiz Felipe Centeno Ferraz holds an LLM degree in Taxation from University of Florida and a specialization in Business Law at the Catholic University of São Paulo – PUC/SP (Brazil). Counselor to the Brazilian Association of Financial Law – ABDF (IFA Brazil). Legal counsel to the Federation of Industries of São Paulo (FIESP) and member of the International Tax Committee Section of International Law of the American Bar Association (ABA). Partner at Mattos Filho, Veiga Filho, Marrey Jr e Quiroga Advogados.



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Patrícia Matos is the leader of transfer pricing practice at Deloitte Portugal and Angola. In 2002 she lead the launching of Deloitte’s transfer pricing practice in Portugal. In 2013, she lead the launching of Deloitte’s transfer pricing practice in Angola. Patrícia was also responsible for technical trainings to Tax Authorities’ transfer pricing teams in Angola (2015) and to the Chambers of Commerce in Cape Verde (2016). She advised clients in several aspects of transfer pricing, ranging from tax audits to comprehensive transfer pricing planning, structuring of intercompany transactions, international business restructurings, defensive documentation, tax litigation and mutual agreements procedures.



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Ramon Tomazela is a PhD Candidate and holds a LLM degree in Tax Law from the University of São Paulo (USP). He also holds a LLM degree in International Tax Law from the Vienna University of Economics and Business (WU). Visiting professor of tax law and international tax law in several universities in Brazil. Partner at Mariz de Oliveira e Siqueira Campos Advogados.



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Gabor is an international tax lawyer working at EY Netherlands. Gabor has over 12 years of experience in corporate reorganizations, international tax and transfer pricing. Gabor has been focusing on transfer pricing, international controversy and on conversion / permanent establishment questions in relation to business restructurings. Gabor holds an Advanced LLM in International Tax Law from the International Tax Center (Leiden) and also has an LLM degree from University College London.



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Priscila is a senior associate of Pinheiro Neto Advogados and advises international and Brazilian clients from wide range of industries on international taxation and tax planning projects. She has over 15 years of experience in tax consulting, having spent more than 8 years in Europe, advising multinational enterprises on cross-border investment structures. Priscila holds a Bachelor of Law from the University of São Paulo, and took a Specialization degree in Business Administration from Fundação Getúlio Vargas. She also holds a LL.M in International Tax Law from Leiden University (The Netherlands). She was an assistant professor in ITC 2006/2007 LLM Program.



Bhavita Kumar

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Bhavita has carried out her professional career in India and Europe with a focus on international profit attribution, digitalisation, emerging technology and use of value chain optimization and transfer pricing as a tool for business transformation. She completed her Advanced LL.M. in International Tax Law (cum laude) from the International Tax Center, Leiden University in 2019 and she has relevant publications focused on the Transfer Pricing Challenges of Digitalisation for players in the intermediary e-commerce economy, the underlying tax policy and the impact of OECD Proposals.



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Victor Polizelli is the Coordinator of the LLM in International Tax Law at the Brazilian Institute of Tax Law (IBDT) and a Professor of the Full Master's Program of IBDT, where he focuses in transfer pricing, tax policies and negotiation of tax treaties. Victor holds PhD and LLM degrees in Tax Law from the School of Law of the University of São Paulo. He also holds a BAcc from the School of Economics, Management, Accounting and Actuarial Sciences and a LLB from the School of Law, both at the University of São Paulo. Partner at KLA – Koury Lopes Advogados.



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Ligia is a Senior Manager in EY's International Tax and Transfer Pricing group in the Netherlands with over 10 years of experience in international taxation and transfer pricing. She has also worked in Germany and Brazil, in both in-house and consulting positions. Ligia holds a masters degree (LL.M.) in International Tax Law from Leiden University. Her roles within the Dutch, German and Brazilian practices have given her broader advisory experience on international tax matters, including preparation of technical positions for controversy cases, procedures for resolving double taxation, tax audits, operating model design and management of restructuring projects, and development of transfer pricing policy and documentation strategies. Her experience covers a wide range of industries, such as digital & technology, consumer products and retail, automotive, among others.