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LEGAL AND PROFESSIONAL EXPERIENCE

NEW YORK UNIVERSITY SCHOOL OF LAW, New York, New York, USA

Global Professor of Law

January to May 2019

Teach in the Tax Program, research and seminars.

JOHANNES KEPLER UNIVERSITY OF LINZ, LAW SCHOOL, Linz, Austria

Professor of Tax Law

Since January 2009, full time since 2010

Head of the Institute for Fiscal Law, Tax Law and Tax Policy

Since 2013

Head of the Research Institute for Tax Law and Tax Management

Since 2013

Deputy Head of the LIT Digital Transformation and Law Lab

Since 2017

Conduct scientific research and hold regular courses on various aspects of Austrian, European and International tax law.

UNIVERSITY OF FLORIDA, LEVIN COLLEGE OF LAW, Gainesville, Florida, USA

Visiting Professor

January to May 2013 and
February to March 2018

Taught in the Graduate Tax Program.

UNIVERSITY OF SYDNEY, SCHOOL OF LAW, Sydney, Australia

Visiting Professor

February and March 2016

Research and seminars.

FEDERAL MINISTRY OF FINANCE, Vienna, Austria

Department of International Tax Law

January to December 2009

Development of legislation, ordinances and taxpayer guidance. International mutual agreement procedures, including transfer pricing cases. Tax treaty negotiation and cooperation with international organizations.

NEW YORK UNIVERSITY SCHOOL OF LAW, New York, New York, USA

Acting Assistant Professor of Tax Law

August 2006 to August 2008

Conducted scientific research and taught regular courses on US Corporate Taxation, International, Comparative and European Tax Policy, and Taxation of International Business Transactions. Assisted the Director of the International Tax Program and served as faculty advisor to students in the International Tax Program.

JOHANNES KEPLER UNIVERSITY OF LINZ – DEPARTMENT OF TAX LAW, Linz, Austria

Assistant Professor

September 2001 to July 2006

Research Assistant

March 1999 to June 2001

Conducted scientific research, taught regular courses on individual and corporate income taxation and International and European tax law, and lectured frequently on various aspects of Austrian, International and European tax law. On leave from October 2002 to July 2004 to join the Federal Ministry of Finance and to pursue postgraduate studies in the US.

FEDERAL MINISTRY OF FINANCE, Vienna, Austria

Department of International Tax Law

October 2002 to March 2003

Collaborated on the development of ordinances. Conducted international mutual agreement procedures. Drafted documents in particular international tax cases. Examined and reported on orders and decrees from the international tax

perspective. Advised subordinated authorities and taxpayers on issues including interpretation of tax treaties and national inbound and outbound taxation.

EDUCATION

JOHANNES KEPLER UNIVERSITY OF LINZ, SCHOOL OF LAW, Linz, Austria

Habilitation in the area of Austrian, International and European Tax Law with a thesis on “Double Taxation Conventions and European Law”, awarded the title of “Privatdozent”, June 2006

Honors: Mitchell B. Caroll Prize 2007
Albert-Hensel-Prize 2007
Wolfgang Gassner Award 2007
Walther Kastner Prize 2007
Deloitte Award 2007
Kardinal Innitzer Award 2007

NEW YORK UNIVERSITY SCHOOL OF LAW, New York, New York

Master of Laws (LL.M.) in International Taxation, May 2004

Honors: Hauser Global Scholar (one year full scholarship awarded on basis of academic merit) (2003-2004)
Flora S. and Jacob Newman Award for distinction in the LL.M. International Tax Program (2004)

JOHANNES KEPLER UNIVERSITY OF LINZ, SCHOOL OF LAW, Linz, Austria

Doctor iuris (Dr. iur.) with highest distinction, May 2002

Magister iuris (Mag. iur.), October 2000 (top 1%)

Honors: Ludwig Scharinger Award 2002 (for doctoral thesis)
Walter Haslinger Award 2002 (for doctoral thesis)
Merit Scholarships by Johannes Kepler University in 1998, 2001, and 2002
Merit scholarship by the Federal Ministry of Science and Education, 2003
Merit scholarship by the Government of Upper Austria, 2003

JOHANNES KEPLER UNIVERSITY OF LINZ, BUSINESS SCHOOL, Linz, Austria

Doctor rerum socialium oeconomicarumque (Dr. rer. soc. oec.) with highest distinction, April 2003

Magister rerum socialium oeconomicarumque (Mag. rer. soc. oec.) with highest distinction, March 2002

Honors: Richard Büche Award 2001 (for master’s thesis)
Merit Scholarships by Johannes Kepler University in 2002 and 2003

ADDITIONAL INFORMATION

PUBLICATIONS

Academic publications as author and co-author on various aspects of Austrian, International and European tax law with a focus on business and corporate taxation (10 monographs, several anthologies as an editor, more than 300 articles, book chapters, and reviews of court decisions in academic journals and anthologies, many of them in English). Member of the board of editors, permanent member of the academic staff of several legal journals. – For a complete list of publications, including downloadable pdf-files, please visit koflerge.org.

TEACHING AND LECTURING EXPERIENCE

Teach regular courses at Johannes Kepler University Law School on Austrian, International and European tax law and policy and regularly give academic lectures and invited presentations on various aspects of Austrian, International and European tax law to academic and professional audiences, including several courses and lectures on transfer pricing and profit allocation to permanent establishments. Teach courses in several postgraduate programs in Europe and the United States, including the programs in Gainesville, Linz, Luxembourg, St. Gallen, Vienna and Zürich. Co-organized several international conferences. – For further information, please visit koflerge.org.

MEMBERSHIPS ETC.

Actively involved with and leading positions in some professional organizations or commissions, including:

- Member of the Permanent Scientific Committee (PSC) of the International Fiscal Association (IFA) (since 2016).

- Member of the board of the Austrian Branch of the International Fiscal Association (IFA) (since 2015).
- Alternate member of the EU’s Joint Transfer Pricing Forum (JTPF) (since 2015).
- Member of the Austrian government’s commission on tax reform (2014).
- Chairman of the CFE European Tax Advisers’ “ECJ Task Force” (since 2013).
- Corresponding Member of the Scientific Board of the Austrian Chamber of Tax Advisors, vice-chairman of the working group on constitutional law and EU law (since 2015).
- Deputy Delegate to the Fiscal Committee of the CFE European Tax Advisers (since 2010).
- Member of the Committee on taxation in Austria, Germany and Switzerland (“D-A-CH Steuerausschuss”, since 2009).

Member of, e.g., International Fiscal Association (IFA), of the German Association of Tax Law (DStJG), of the “Österreichischer Juristentag” (ÖJT) and of the Upper Austrian Law Association. “Professor Associè” at the University of Luxembourg (since 2011).

NATIONALITY

Austrian.

LANGUAGES

German (native language); English.