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TREATISES & COMPRENDIUMS (year of publication/edition and no. of volumes)

8. **Texas Estate Planning** (Lexis forthcoming from August 2017)

BOOKS (year of publication and no. of volumes)


SHORT BOOKS

4. **Tax Reform for South Africa** (International Law & Tax Institute, Geneva 1995) (Barry Spitz & William H. Byrnes)
TREATISE & BOOK CHAPTERS

Mertens Law of Federal Income Taxation (Thomson Reuters/Westlaw) – 16 Commissioned Chapters, from 100 to 450 pages in length


Oxford University Press


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**TEXTBOOKS**


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SUBSCRIPTION NEWSLETTER


GOVERNMENT COMMISSIONS / COURT EXPERT

- Expert Declarations to Two Courts of First Instance in Switzerland on IRS procedural matters regarding information collection
- William J. Fulbright Specialist Roster (Commission 2013 – 2018), appointed by peer review committee

160 SUBSTANTIAL BOOK SUPPLEMENTS

1. Supplement, in FOREIGN TRADE BRIEFS- INTERNATIONAL WITHHOLDING TAX TREATY GUIDE (Release 149) (with Dr. Robert J. Munro) (LexisNexis March 2016)
2. Supplement, in INTERNATIONAL TRUST LAWS & ANALYSIS (& COMPANY LAWS) RELEASE 150 (Wolters Kluwer March 2016) (with Dr. Robert J Munro)
5. Supplement, in PRACTICAL GUIDE TO U.S. TRANSFER PRICING 10 (LexisNexis December 2016)
6. Supplement, in FOREIGN TRADE BRIEFS 2nd Ed. 2 (Release 519) (with Dr. Robert J Munro) (LexisNexis Matthew Bender, New York, December 2016)
7. Supplement, in FOREIGN TRADE BRIEFS- INTERNATIONAL WITHHOLDING TAX TREATY GUIDE (Release 149) (with Dr. Robert J. Munro) (LexisNexis December 2016)
8. Supplement, in Taxation of Oil & Gas Transactions (Release 76) (LexisNexis Matthew Bender, New York, December 2016)
13. Supplement, in FOREIGN TRADE BRIEFS 2nd Ed. 2 (Release 518) (with Dr. Robert J Munro) (LexisNexis Matthew Bender, New York, October 2016)
20. Supplement, in Taxation of Oil & Gas Transactions (Release 75) (LexisNexis Matthew Bender, New York, June 2016)
22. Supplement, in *FOREIGN TRADE BRIEFS- INTERNATIONAL WITHHOLDING TAX TREATY GUIDE* (Release 145) (with Dr. Robert J. Munro) (LexisNexis July 2016)
25. Supplement, in *FOREIGN TRADE BRIEFS- INTERNATIONAL WITHHOLDING TAX TREATY GUIDE* (Release 142) (with Dr. Robert J. Munro) (LexisNexis March 2016)
26. Supplement, in *FOREIGN TRADE BRIEFS 2nd Ed. 2* (Release 516) (with Dr. Robert J Munro) (LexisNexis Matthew Bender, New York, March 2016)
27. Supplement, in *TAX HAVENS OF THE WORLD 3* (Release 154) (with Dr. Robert J Munro) (LexisNexis Matthew Bender, New York, Feb 2016)
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31. Supplement, in *PRACTICAL GUIDE TO U.S. TRANSFER PRICING 9* (LexisNexis December 2015)
34. Supplement, in *INTERNATIONAL TRUST LAWS & ANALYSIS (& COMPANY LAWS) 2* (Wolters Kluwer 2015) (with Dr. Robert J Munro)
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42. **Supplement, in FOREIGN TRADE BRIEFS- INTERNATIONAL WITHHOLDING TAX TREATY GUIDE** (Release 144) (with Dr. Robert J. Munro) (LexisNexis Sept 2015)
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156. *Supplement, in* Foreign Trade Briefs 2 (with Dr. Robert J Munro) (LexisNexis Matthew Bender, New York 2009)
157. *Supplement, in* *Foreign Trade Briefs 3* (with Dr. Robert J Munro) (LexisNexis Matthew Bender, New York 2009)
158. *Supplement, in* *Foreign Trade Briefs 4* (with Dr. Robert J Munro) (LexisNexis Matthew Bender, New York 2009)
159. *Supplement, in* *Tax Havens of the World 1* (with Dr. Robert J Munro) (LexisNexis Matthew Bender, New York 2009)
161. *Supplement, in* *Tax Havens of the World 3* (with Dr. Robert J Munro) (LexisNexis Matthew Bender, New York 2009)
162. *Supplement, in* *Tax Havens of the World 4* (with Dr. Robert J Munro) (LexisNexis Matthew Bender, New York 2009)

**EDITORIAL BOARDS**

- Editorial Advisor, international tax publications, LexisNexis professional (2008 – continuing)
- **EXCHANGE CONTROL ENCYCLOPEDIA** (William H. Byrnes, IV managing editor) (International Law & Tax Institute, Geneva 1995) (Barry Spitz)

**Law Professor Blog Network**


**LEXIS MIND-MAPS**


**125+ ACADEMIC, GOVERNMENT, ASSOCIATION, CONFERENCE PRESENTATIONS**

1. Speaker, Legal Education 2.0, November 2, 2017 (Georgetown)
2. Speaker, Education 4.0, Education in the Fourth Industrial Revolution, April 22, 2017  (Chennai, India)
5. National Tax Association session 32: Information and Offshore Tax Evasion (Compliance and Enforcement) November 10-12, 2016 (Nov 11 8:30 to 10:00 Session Organizer: John Guyton, Internal
Revenue Service). Proposing efficiencies for the overlapping systems for collection, verification, and
dissemination of taxpayer information for encouraging compliance with reporting of foreign income and
assets

6. Texas State Bar Association Tax Section International Tax Update, Houston, November 4, 2016
Developments with IRC 482, IRC 367, CbCR, and 2016 cases.

7. Texas State Bar Association Tax Section International Tax Update, Dallas, November 3, 2016
Developments with IRC 482, IRC 367, CbCR, and 2016 cases.

Tax Information Reporting and Compliance, November 2, 2016

Withholding for Chapter 3 and Chapter 4, October 31, 2016

10. The Criminalization Of Tax Avoidance - How May The US Leverage Its FATCA IGA Bilateral Process To
Incentivize Good Tax Administrations Among The World Of Black Hat And Grey Hat Governments? A
Carrot & Stick Policy Proposal, Jesus College (Cambridge University) (11:00 to 13:00 – Saturday 11th
September 2016):

11. Human Trafficking, Smuggling, Exploitation And Slavery – A Proposal For PLIs As An Analytical Tool For
Indicia And Suspicion, Sidney Sussex College (Cambridge University) (14:00 to 17:00 – Wednesday 7th
September 2016)

12. FATCA and CRS, the Challenges of Data, University of Amsterdam, 10 March 2017, 15:00 – 16:00

13. Transfer Pricing course and special presentation “Testing Starbucks’ transactional net margin method
application to its roasting operation”, University of Amsterdam Faculty of Law’s Centre for Tax Law, (LLM
course, February 8 - 12, 2017).

14. Collection, Verification, and Dissemination of Taxpayer Information for Encouraging Compliance with
Reporting of Foreign Income and Assets, National Tax Association’s 109th Annual Congress (Nov 10 – 12,
2016).

15. Country-by-Country Reporting and its Impact on Texas MNEs, Texas State Bar Association Section of

16. Country-by-Country Reporting and its Impact on Texas MNEs, Texas State Bar Association Section of


2016.

Among the World of Black Hat and Grey Hat Governments? A Policy Proposal. Cambridge’s 34th Annual

20. Human trafficking, smuggling, exploitation and slavery - Where does the buck stop? Cambridge’s 34th


https://theknowledgetgroup.org/all-events-list/live-webcasts/event-homepage/?event_id=1572 see Press
release here

23. Forms W-8BEN and W-9 Compliance in Foreign and U.S. Business Transactions:
Meeting the Demands of the Substantially Overhauled W-8BEN Under New FATCA Rules (May 12, 2016)
https://www.straffordpub.com/products/forms-w-8ben-and-w-9-compliance-in-foreign-and-u-s-business-
transactions-2016-05-12

24. 2nd International Economic Forum “In Search of the Missing Growth” held at the Russian
Federation’s Financial University (Moscow), Nov. 24 – 26 (2015); delivered a paper on applying valuation
methodologies for cross-border activities – intangibles within ‘bundled services’ arrangements and within
‘platform contribution transactions’.

25. W8s, W9s, and Equivalent Tax Self Certification Compliance for Customer Identification
and Withholding Determination (Stafford Information Solutions) November 12, 2015.

26. A Pedagogical Apologist for Establishing a Distance Education Program, CALI, University of Denver June
29. Recommended Best Pedagogical Practices for Legal Education Delivered With Distance Learning Technologies, University of Arizona Faculty Scholar Series, April 8, 2015.
34. The 2015 New Year's FATCA Update (Stafford Information Solutions) January 22, 2015.
35. Exchange of Information of Corporate Financials of MNEs for Addressing BEPS, University of Amsterdam Centre for Tax Law (Winter course) January 21-27, 2015.
36. Equivalent Tax Self Certification under FATCA, GATCA and the EU TSD (Stafford Information Solutions) November 24, 2014.
40. Program Start up and Assessment, Dean’s Invitation, Thurgood Marshall School of Law, Texas Southern University, July 24-25, 2014.
42. Implementing Treasury and IRS Amendments for NFFEs; Determining FFIs and Payee Status; Complying With IGAs, Withholding and Reporting Rules (Stafford Information Solutions) June 26, 2014.
43. Exchange of Information: FATCA, GATCA, BEPS, in the context of Latin America, Rosario University – Bogota and Amsterdam Centre for Tax Law (ACTL) of the University of Amsterdam (Bogota, Colombia) May 22-23, 2014.
45. Burning Issues for International Tax Career Seekers, University of San Diego School of Law Graduate Tax Program, April 7, 2014.
47. Section Chair, Best Practices Report, Distance Learning Workgroup for Legal Education, Washington University School of Law (St. Louis), March 7, 2014.
48. Tying Course Learning Outcomes into a Flip the Classroom Model, Distance Learning Workgroup for Legal Education, Washington University School of Law (St. Louis), March 6, 2014.
50. Intergovernmental Agreements & Automatic Exchange With the USA: Is This The End of the United States as the World’s Largest Offshore Centre? Moscow State University & University of Amsterdam, Moscow, October 25, 2013.
51. Do the Benefits to Russia of Compliance with the USA’s FATCA Outweigh its Russian Costs?, Russian Tax Conference, Siberian Federal University, September 27, 2013.
52. Are some U.S. agreements more equal than others? DTAs, TIEA, IGAs and the U.S. Constitution. Exploring the Executive / Senate Treaty authority, House of Representative "Origination" of Tax authority, and Congressional Regulation of Commerce with Foreign Nations authority, Conference on Constitutionalism, Siberian Federal University, Krasnoyarsk, Russia, September 26, 2013.
54. Categorization of Trusts by FATCA and the Intergovernmental Agreements, HSBC, Switzerland, April 19, 2013.
56. Intergovernmental Agreement Shopping for Definitions, UBS, Switzerland, April 18, 2013.
57. Where Will Deposits in the US Flee?, Julius Bear, Switzerland, April 18, 2013.
59. FATCA’s Impact on US Banking by Mexican Clientele, UBP, Switzerland, April 17, 2013.
60. FATCA Implications for Latin American Clientele of Swiss Banks, LATCAM – Swiss Chamber of Commerce Switzerland (April 16, 2013).
63. De que modo outras culturas juridicas esperam se relacionar com o Brasil?, Forum de Coordenadores dos programs de pos-graducao em direito, supported by the OAB and CAPES, November 30, 2012.
64. FATCA’s Impact on Foreign Investment in US Real Estate and Related Products from 2013, Thomson/Sweet & Maxwell authors conference (London), November 8, 2012.
75. The Compliance Costs to Business and Government versus the Expected Revenue Collection for the Overlapping Compliance Regimes of the USA (and there applicability to South Africa), SAIT Johannesburg, October 13, 2010.
88. ‘*How to Approach’ for Online Programs*, CALI Conference, University of Nevada School of Law June 2007.

   a. Author of four papers for Workshop *Electronic B2B Markets Platforms, The Emerging Trend*
   b. **Topic I:** Emerging Trends in Electronic Commerce
   c. **Topic II:** Emerging Trends for 2001 “3D and B2B/B2C” (Asian Focus)
   d. **Topic III:** E-commerce: Business & Tax
   e. **Topic IV:** Online legal education: a US LLM program.


129. **A State’s Civil Liability under Treaty of Rome Article 215**, *Europa Institute Workshop*, University of Amsterdam, Faculty of Law, Amsterdam (October 1994).

**Awards**

Education Leadership Award: “Professor William Byrnes’ leadership and contribution to the field of education is well known,” said Chairman of Awards & Academic Committee Edward Smith. “The position that you occupy in the fraternity is strategic and iconic. As a thinker and doer you are a role model and a believer in change. I am pleased that the Jury and Council of Board members would like to confer the Education Leadership Award to you.” (India’s National Board of Accreditation at WOSA 2012)

**Media Coverage**

**Academic**

- **Ernst & Young**: “The central function of the tax office has evolved from strategy and planning into risk management, says William Byrnes, professor of law and associate dean at Texas A&M University. … Texas A&M University is among the pioneers of change in tax educationl.”

- “… William Byrnes, who’s a leader in the online field…” (the National Jurist, March 2013).

- “Perhaps no one in legal academia has more experience with online master’s degrees than William Byrnes, Associate Dean for graduate and distance education programs at Thomas Jefferson School of Law.” (The National Law Journal, May 20, 2013)
• “Byrnes created the first online LL.M. at an ABA law school in 1994.” (the National Jurist, February 2015)
• Professor William Byrnes (Texas A&M) ranks #15 among tax professors for SSRN 2014-2015 (recents), and #13 for SSRN tax professors 2015-2016
• “William H. Byrnes, IV is a pioneer in online education.” Producing Leaders in the Legal Academy, one of top alumni in legal academia: Fall 2012 by Loyola Lawyer

Example Citations and Quotes in Media

5. Should you take a lump sum, an annuity, or a mix of both when you retire? Market Watch (Dow Jones) Dec 2, 2016: http://www.marketwatch.com/story/should-you take-a-lump-sum-an-annuity-or-a-mix-of-both-when-you-retire-2016-12-02
23. Quoted in USA Today: If you inherit an IRA, make a plan before doing a thing (March 15, 2016).
37. CNN: http://ireport.cnn.com/docs/DOC-1165753
38. “...according to analysis done by tax expert William Byrnes.” Association of Certified Financial Crime Specialists in “OECD Tax Chief Sees No ‘Soft Landing’ for Tax Reporting Deadline” (June 15, 2015). also see “Former HSBC Chief Admits Compliance Missteps at Two Affiliates” (July 14, 2015).

Misc

• “The company also points out that the expert authors—Robert Bloink, Esq., LL.M., and William H. Byrnes, Esq., LL.M., CWM®—are delivering real-life guidance based on decades of experience. The authors’ knowledge and experience in tax law and practice provides the expert guidance for National Underwriter to once again deliver a valuable resource for the financial advising community,” added Kravitz. (PR Newswire, January 21, 2014)
• “Prof. Byrnes and his team bring enormous technical expertise as well as broad insights into the larger trends driving client decisions on tax, investment and wealth management strategies.” (March 7, 2011, PR Newswire)
• “On behalf of the U.S. Department of Commerce SABIT Program, we would like to thank you for your contribution to the 2013 SABIT Intellectual Property Rights: Technology Commercialization Program. … We appreciate the time that you took to make the meeting a success and hope that you enjoyed the opportunity to meet with the representatives from Kazakhstan, Kyrgyzstan, Moldova, Russia, Tajikistan, Ukraine, and Uzbekistan.” U.S. Department of Commerce Letter (2013)
ACADEMIC POSITIONS

Courses Taught Since 1994: Income Tax; International Business Transactions; International Taxation; Estate & Gifts; Partnerships; Business Associations; Trusts & Estates; Tax Treaties; Transfer Pricing; Estate Planning; Financial Crimes; Law & Economics (Regulatory Analysis); Property Law, Civil Law and Comparative Law.

Texas A&M University Law School (2015 – present)
- Associate Dean, Special Projects
- Executive Professor of Law
  - University wide committee on entrepreneurship minor (2017)
  - University wide committee on distance education (2017)
  - Graduate Programs Committee (2016-2017)
  - Curriculum Committee (2015-16)
  - Law Library Hiring Committee (2015-16)
  - Graduate & JD Coordination Committee (2015-16)
  - International Programs Committee (2015-16)
  - Online Degree Working Group (2015-16)
- Courses Taught: Federal Income Taxation, guest lecturer at Mays Business School for Transfer Pricing

- Associate Dean, Graduate & Distance Education
- Founded and manage online International Tax & Financial Services programs (LL.M., J.S.M., CLE) with 100 - 200 students annually
- Founded and manage 5-year J.S.D. (Ph.D. level) online program
- Received Leadership Education Award from India's NBA (see above)
- ABA Self Study Committee and Interface with Site Team Chairs 2010
- Law School 5-Year Strategy Committee, 2009
- Graduate Programs Committee, 2007-2015
- Established international academic cooperation relationships with Spain, Brazil, Russia, South Africa, Turkey, Netherlands, among other countries
- Established and manage unique JD student professional publication-to-career residential program, weekly workshop
- Primary Estabisher of Workgroup for Distance Education for Legal Education with representative Deans, Associate Deans, and other stakeholders with a representative assembly from over 100 law schools participating from all tiers and regions since 2010, bi-annual meetings plus AALS.
- Courses: income tax, international tax, corporations, transfer pricing, partnerships, anti money laundering, trusts, international business, publication methodology seminar

St. Thomas University School of Law (2000-2006)
- Professor of Law, with Tenure, 2005-2006
- Associate Professor of Law, Tenure Track 2002-05
- Visiting Professor of Law, 2000-02
  - ABA & AALS Self Study Committee, 2004-05
  - SACS Self Study Committee, 2002-03
  - Law School Administrative Cabinet, 2000-03
  - Law School 7-Year Strategy Committee, 2004-05
  - University-Law School Liaison, 2002
  - Academic Integrity Committee, 2002-03
  - Academic Standing Committee, 2003-05
  - University Technology Committee, 2003
  - University Liaison Committee with Open University of Spain, 2000-01
  - Technology Committee, 2000-06
  - Dean’s Circle (fundraising)
• Founded and managed online International Tax Master and Doctoral program for lawyers and non-lawyers, 80 students per annum
• Organized four conferences attracting 200 financial professionals each
• Teaching tax and business courses annually, including income tax, international tax, corporations, transfer pricing, partnerships, anti money laundering, trusts, property law, international business

Regent University School of Law (1998-2000)
• Associate Professor of Law, Tenure Track, 1998-2000
  o $3,000 Regent University Board Of Trustees Faculty Writing Award for FRAMEWORK AND CLASSIFICATION SYSTEM FOR COMPARISON OF WORLD’S FISCAL REGIME commissioned by Kluwer Law International (London).
    Criteria: Board of Trustees selects faculty members, if any, based upon quality of writing and originality of idea; only law faculty member to receive award in 1999.
• Founded and managed every aspect of first online LL.M. at an ABA accredited law school, organized the development of the learning management system and delivery software, and all course texts

Faculty of Commerce, Law, and Management, Department of Accountancy, University of the Witwatersrand (Johannesburg, South Africa) (1996-2014)
• Visiting Professor, Thesis Supervisor, M. Comm. Taxation
  Supervisor Professor Alwyn De Koker, Director of Master of Commerce (Tax) program. Role establishing International Tax Module of Master program and for international tax lectures of Master degree and Accounting Honors undergraduate), Courses taught: Principles of International Taxation; Tax Treaties and Transfer Pricing. Also annually review Master Thesis’s.

Departement Rekeningkunde van die Randse Afrikaanse Universiteit (South Africa) in association with the Institute of Advanced Studies (1995-1996)
• Lecturer (1994 with Institute of Advanced Studies)
  Coordinator of and Lecturer for international tax program.

PUBLIC & ACADEMIC SERVICE

• Executive Committee, Work Group for Distance Education in Legal Education, Chair of Sub Group for Best Practices Report: “Distance Learning in Legal Education: A Summary of Delivery Models, Regulatory Issues and Recommended Practices” (2011 - current)
• American Association of Law Schools Section on International Legal Exchange, Executive Committee (2012 - current), Chair Elect (2016)
• American Association of Law Schools, Section on Graduate Programs for Foreign Lawyers (Non-US Lawyers), Executive Committee, Vice Chair, Chair (2008-2010), Treasurer (2015)
• American Association of Law Schools Section on Post-Graduate Legal Education, Executive Committee, Vice Chair, Chair (2003-05)
• Florida Bar Association Committee on Continuing Legal Education (2001-2005)
• Intergovernmental Child Cyber Control Organization, pro bono (2007-2010)
• Consulted by numerous U.S. and foreign academic institutions on educational and program development issues since 1998

EDUCATION

(three year doctoral level directed dissertation and course work supervised jointly by distinguished Netherlands international tax professors via the International Bureau of Fiscal Documentation and members of the tax law faculty of University of Amsterdam)

Research & Academic Institution: International Bureau of Fiscal Documentation/ Universiteit van Amsterdam Faculteit der Rechtgeleerdheid
Dissertation Supervisors: Prof. Emeritus Jacobus (Joop) van Hoorn (UvA) and Prof. Willem Kuiper (IBFD)
Dissertation Topic: Trade Aspects of Transfer Pricing
Course Work Supervisors: Prof. Hubert Hamaekers (Maastricht) and Prof. Willem Kuiper (Director, International Tax Academy, IBFD) / Elisabeth Hans (ERASMUS Program Director, University of Amsterdam Faculty of Law)

Master 1992-1995
University: Universiteit van Amsterdam
Europa Institute/ASIR van Faculteit der Rechtgeleerdheid
Type of Degree: Master of Laws
Major: European Business
Honor: Jessup International Moot Court Team (1992-93) representing Principality of Monaco
Memorandum: Third State Shareholder Rights During and After Expropriation
Honor: Debate Team, European Law Student Association, University Of Amsterdam (1993-94)

Juris Doctorate 1989-1992
University: Loyola University School of Law
Award: Gillis Long Poverty Law Center Award (1992)
Honor: Vice President, Student Bar Association (1991-92)
Post Graduation: Featured in alumni magazine in 2015 as distinguished civil law academic alumni and story of great grandfather William H Byrnes, Sr, who was a founder and one of the initial deans of the law school.

Bachelor 1984-1989
University: Tulane University Murphy Institute of Political Economics
Major: Political Economics - Law Track
Honor: full tuition scholarship