



John Hughes appointed permanent director of IRS's Advance Pricing and Mutual Agreement Program

Global Transfer Pricing Alert 2017-019

The IRS has named John Hughes as permanent director of its Advance Pricing and Mutual Agreement (APMA) Program, as reported in Bloomberg BNA's *Transfer Pricing Report*. Hughes has served as acting director of the APMA Program since July 10, 2016, taking over from former Director Hareesh Dhawale.

Hughes joined the IRS in September 2011. Prior to serving as acting director, Hughes worked as a senior manager in the APMA Program and as senior international advisor to the Treaty and Transfer Pricing Operations practice within the IRS's Large Business and International Division. Hughes was in private practice before joining the IRS.

Hughes will be the third director of the APMA Program, which was formed in early 2012 when the IRS's Advance Pricing Agreement Program merged with a portion of the Office of the US Competent Authority. The APMA team negotiates transfer pricing agreements with taxpayers and foreign tax authorities and works to resolve transfer pricing cases under the mutual agreement procedure articles of US bilateral income tax treaties.

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