# Experience

## Managing Director, Citigroup Global Markets Inc. *London and New York: September 2001 to present*

## Managing Director, Bankers Trust Company and Deutsche Bank *London: August 1997 to September 2001*

## Partner, Caplin & Drysdale *Washington: June 1992 to August 1997*

## Special Counsel to the Chief Counsel of the Internal Revenue Service, U.S. Treasury Department *Washington: January 1988 to June 1992*

## Associate, Trenham & Simmons *Tampa: July 1986 to August 1997*

# Education

## University of North Carolina at Chapel Hill (JD 1986)

Executive Editor, North Carolina Journal of International Law and Commercial Regulation. Concentration in corporate finance, taxation, and securities law.

## University of North Carolina at Chapel Hill (AB 1983 *cum laude)*

Economics and International Relations Major with Honors. Honors thesis on economic policymaking under military rule in Argentina. Varsity track (pole vault).

# Publications

Amicus Brief, Moore v. Harper, Docket No. 21-1271, filed October 25, 2022

Plambeck, Ring, Mosby, and Price, U.S. Income Taxation of Foreign Corporations, Tax Management Portfolio No. 6460 (editions 2000 to current).

Charles T. Plambeck, *Transfer Pricing Analysis of Global Trading Operations and Procedural Alternatives*, 74 Taxes 1129 (1996).

Charles T Plambeck, H David Rosenbloom & Diane M Ring, *General Report, Subject II*, *Tax Aspects of Derivative Financial Instruments*, CAHIERS DE DROIT FISCAL INTERNATIONAL, Vol. LXXXb, " (Cannes: 1995)

Charles T. Plambeck & David M. Crowe, *Overview of the Taxation of Financial Instruments*, 95 Tax Notes Int'l 123-24 (1995).

Charles T. Plambeck, *The Taxation of Global Trading*, 48 Tax Notes 1143, 1154 (Aug. 27, 1990).

Charles T. Plambeck, *Capital Neutrality and Coordinated Supervision: Lessons for International Securities Regulation from the Law of International Taxation and Banking*, 9 Mich. J. Int'l L. 171 (1988).

Charles T. Plambeck, *Domestication of Foreign Corporations: Tax Planning in the Net of Internal Revenue Code Section 7701(b)*, 11 N.C. J. Int'l L. 131 (1986).

Charles T. Plambeck, *The Razor's Edge: The Doctrine of Forum non Conveniens and the Union Carbide Methyl Isocyanate Gas Disaster at Bhopal, India*, 10 N.C. J. Int'l L. 743 (1985).

Charles T. Plambeck, *Holding the Antitust Line: Laker Airways v. Sabena, Belgian World Airlines*, 10 N.C. J. Int'l L. 251 (1985).

# Interests

History, philanthropy, triathlon, offshore sailing, gardening, landscape architecture, furniture making, travel, other