

	Subject	To Do	In Charge	Due Date
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**Practice Group International Taxation: Minutes of the ITPG Meeting,
held in Miami, on June 21, 2012 from 2:35pm to 6:05pm**

Chairman:	Oliver Biernat
Note taker:	Cindy Hsieh

List of attendees

	Name	Firm	Country/City
1	Baum, Seres	Grupo Work Independent Auditors	Brazil
2	Biernat, Oliver	Benefitax GmbH	Germany
3	Boivin, Mario	Lehoux Boivin, CA	Canada - Quebec
4	Braun, Steven	Drucker & Scaccetti, P.C.	USA - Pennsylvania
5	Bravo, David	Estudio Bravo Sheen Abogados	Peru
6	Busch, Graham	Lawrence Grant Chartered Accountants	United Kingdom
7	Cantor, Steve	Cantor & Webb P.A.	USA - Florida
8	Clark, Matt	Shea Nerland Calnan LLP	Canada - Alberta
9	Den Os, Matthijs	Zirkzee Group	The Netherlands
10	Dichter, Arthur	Cantor & Webb P.A.	USA - Florida
11	Dickey, Douglas	DRDA PLLC	USA - Texas
12	Domburg, Nick	Limes International B.V.	The Netherlands
13	Drucker, Ronald	Drucker & Scaccetti, P.C.	USA - Pennsylvania
14	Franko, Dale	Moodys LLP Tax Advisors	Canada - Alberta
15	Frascella, Thomas	Smart Devine	USA - Pennsylvania
16	Girard, Alain	FIDAG	France
17	Girardi, Ugo	Refidata srl	Italy
18	Guerrero Rosas, Sergio	Guerrero y Santana, S.C.	Mexico
19	Hasselmann, Toon	Limes International B.V.	The Netherlands
20	House, George	Brooks, Pierce, McLendon, Humphrey & Leonard LLP	USA - North Carolina
21	Hsieh, Cindy	Rowbotham & Company LLP	USA - San Francisco
22	Hsu, Doris	The Ruchelman Law Firm	USA - New York
23	Ingber, Dov	Vardi, Brukner, Ingber, Rozenzveig CPA	Israel
24	Kapel, Huub	Limes International B.V.	The Netherlands
25	Kelly, Mark	Rowbotham & Company LLP	USA - San Francisco
26	Lehoux, Louis-Alexandre	Lehoux Boivin, CA	Canada - Quebec
27	Lopez Lima Levi, Raimundo	Lopez Levi Associates, PA	USA - Florida
28	Marita, Brian	Ciuni & Panichi, Inc. CPA	USA - Ohio
29	Mendoza, Dagoberto	DRDA PLLC	USA - Texas
30	Motta Aispuro, H. Marco	New Corporate Approach, S.C.	Mexico
31	Nerland, Dennis	Shea Nerland Calnan LLP	Canada - Calgary
32	Nerland, Stephen	Cantor & Webb P.A.	USA - Florida
33	Orellana, Walter	OHM & Co. Cia Ltda. Auditores y Consultores	Ecuador
34	Rajah, Alan	Lawrence Grant Chartered Accountants	United Kingdom
35	Rechel, Astrid	Benefitax GmbH	Germany
36	Robinson, Helen	Wedlake Bell LLP	United Kingdom
37	Rodriguez, Janneth	Tower Consulting Worldwide S.A.S.	Colombia
38	Sanchez Arellano, Rodolfo	New Corporate Approach, S.C.	Mexico
39	Torres Romero Jr., Camilo	Tower Consulting Worldwide S.A.S.	Colombia
40	Torres, Camilo	Tower Consulting Worldwide S.A.S.	Colombia

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41	Viso, Angel Gabriel	Viso, Rodriguez, Cottin, Medina, Ramirez & Associates		Venezuela
42	Wolosky, Gabe	Prager and Fenton		USA - New York
43	Zomerfeld, Raymond	Vizcaino, Gitlin + Zomerfeld		USA – Florida
44	Cocca, Claudio G.	Geneva Group International		Switzerland
45	Kaeser, Peter	Geneva Group International		United Arab Emirates
46	Magliona, Claudio	Garcia Magliona y Cia. Abogados		Chile

1.	<p>2:35pm – 2:45pm Welcome by chairperson Oliver Biernat, introduction of Sergio Guerrero (Latin America Chair) and Cindy Hsieh (Representing Brian Rowbotham)</p> <p>Welcome the attendees. Oliver gives an overview on the timetable of the ITPG meeting sessions.</p>			
2.	<p>2:45pm to 3:05pm [Featured country: Mexico]</p> <p>Presentation by Sergio Guerrero on “Real Estate Investment Trust in Mexico”</p> <p>Question from audience: Qualification of Mexican REIT – In the USA, REITs are generally publically traded because they require more than 100 shareholders. In Mexico, they can be closely held with 10 or more member requirement.</p>			
3.	<p>3:05pm – 3:35pm [Featured country: Brazil]</p> <p>Presentation by Seres Baum on “Tax issues of exporting goods and services to Brazil”</p> <p>General sentiment: Brazil has over 300 types of taxes imposed, complex but seems to be working.</p>			
	<p>3:35pm - 3:38pm Short fun video session</p>			
4.	<p>3:30pm - 3:53pm [Featured country: Canada]</p> <p>Presentation by Dale Franko on “Real Estate Investment in Canada”</p> <p>Discussion on Canadian investment and taxation</p> <p>3:53pm – 4:08pm [Featured country: Canada]</p> <p>Presentation by Matt Clark on “Permanent establishment issues between US/Canada”</p> <p>Discussion on new PE rules between US LLC in Canada</p>			
	<p>4:08pm – 4:28pm Coffee Break</p>			
5.	<p>4:28pm – 5:08pm [Featured country: USA]</p> <p>Presentation by Doris Hsu on “Foreign Investment in U.S. Real Estate”</p>			

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	<p>-- Passed out a handout for proposed upcoming North America WebEx: July 31, September 25, November 26.</p> <p>-- Suggestions for North American firm communication: circulation of firm events and presentation material</p> <p>8) Asia/Australian Announcements by Dov Ingber, ITPG Vice Chair Asia:</p> <ul style="list-style-type: none"> ■ WebEx technical issue with their conference. Had Staff Exchange. Add country to list: Immigration rule <p>Robert Anthony (Chair of trust panel session) asking for volunteers in Rome:</p> <ul style="list-style-type: none"> ■ Steve Cantor (USA) ■ Seres Baum (Brasil, unconfirmed) ■ Nick Domberg (Netherland) ■ Graham Busch (UK) ■ Dov Ingber (Israel, unconfirmed) ■ Dennis Nerland (Canada) <p>9) Rome Conference: Volunteers welcome for interesting topics to present on international issues</p> <p>10) Graham Busch – ITPG Vice Chair. Hosting EasyMeet this year in Prague in November. Explanation of EasyMeet for younger professional.</p> <p>11) Upcoming Conferences:</p> <p>EasyMeet (Prague) – 11/16/2012 to 11/18/2012</p> <p>Asian Conference (Bangkok) – 12/13/2012 to 12/16/2012</p> <p>ITPG (Amsterdam) – 2/7/2012 to 2/10/2012</p> <p>European Conference (Lisbon) – 4/18/2013</p>	<p>Contact Oliver Biernat if you would like to volunteer</p>		
8	<p>6:05pm: Closing: Oliver Biernat closes the meeting</p>			