

Subject	To Do	In Charge	Due Date
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**Practice Group International Taxation: Minutes of the ITPG Meeting,
held in Eisenberg, on 16 June 2011, 15:30 -18:10**

Chairman:	Oliver Biernat
Secretary:	Oliver Biernat

Participants				
Country	Company	Title	Name	First Name
Austria	Grazer Treuhand Steuerberatung GmbH & Partner KG	Dr.	Drawetz	Stefan
Austria	Heller Consult Tax and Business Solutions Ltd. Vienna		Heller	Elisabeth
Austria	Heller Consult Tax and Business Solutions Ltd. Vienna		Starkbaum	Isabelle
Cyprus	ELIADES & PARTNERS Advocates, Tax & Business Consultants		Eliades	Marios
Germany	Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft		Biernat	Oliver
Germany	Jakoby Dr. Baumhof - Wirtschaftsprüfer Steuerberater Rechtsanwälte		Jakoby	Eugen
Germany	Jakoby Dr. Baumhof - Wirtschaftsprüfer Steuerberater Rechtsanwälte		Jakoby	Brigitte
Israel	Vardi Brukner Ingber Rozenzveig C.P.A.		Ingber	Dov
Italy	Dalla Libera & Partners	Dr.	Dalla Libera	Carlo
Malta	Advocates CREDAL	Dr.	D'Alessandro	Robert
Slovenia	Credibilis		Masolvaric	Nicola
Switzerland	Eurotrust Partners AG		Valentik	Csaba
Ukraine	Legis Audit LLC		Ogabesyan	Karen
United Kingdom	Lawrence Grant, Chartered Accountants		Busch	Graham
United States	GGI		Crowson	Adam
United States	Ciuni & Panichi, Inc. CPA		Marita	Brian
United States	Eisner Lubin LLP.	Prof.	Simon	Robert
United States	Nihill + Riedley P.C.		Smart	James

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1.	<p>Welcome address</p> <p><u>Oliver Biernat</u> welcomes the attendees, giving an overview on the timetable of the meeting.</p>			
2.	<p>2 more licences for Comtax for the period 1 June 2011-31 May 2012</p> <p>Oliver reported that our new GGI member Haines Watts from UK has ordered 2 more licences for Comtax. Therefore the number of users increased to 17. All users should therefore receive a credit note from Comtax of 105 € per licence.</p> <p>Next cancellation will be possible as of 31 May 2012, but please note the cancellation period ahead of this date.</p>			
3.	<p>Taxation of consulting services rendered at the place of the consultant to clients in foreign countries</p> <p><u>Oliver Biernat and Isabelle Starkbaum</u></p> <p>Oliver introduced the participants into the topic covering VAT, sales tax or withholding tax in other countries, which has been discussed via email with about 20 ITPG members.</p> <p>Please see Isabelle´s powerpoint presentation thereto as attachment for details.</p> <p><u>Solution:</u> Building a matrix on tax rules for consulting services rendered to clients in other countries</p> <p>Questions: Questionnaire to all countries (EU countries may skip questions 1-3):</p>	Oliver will send a questionnaire to all ITPG members to be filled in which then can be used for reference for all GGI members	Oliver Biernat	
4.	<p>Brief report on social media campaign of a chartered accounting company</p> <p><u>Graham Busch</u></p> <p>For details please see his power point document as attachment.</p> <p>A discussion was started on the pros and cons of using social media. No agreement could be achieved on the question whether members should invest time and money in social media or not. For more details Oliver referred to a project on this within the PG Enhanced Business Opportunities.</p>			
	Coffee Break 17.00-17.15			
5.	<p>Follow-up on Substance over Form</p> <p>Oliver Biernat and Brigitte Jakoby have issued a press release on our main topic “substance over form” at the Munich Meeting in the German press. So far, it was published 16 times on internet platforms and in other media. As reaction to our German press release we</p>	If you are able and willing to issue an article on this topic in a tax journal in your country please contact	All	

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	<p>received a request from a German professional journal for tax advisors called “Vermögen & Steuern” (translated: wealth and taxes) who have asked us to enlarge and provide a technical article of about 2-4 pages (equalling 10,500 -21,000 characters). We will go for that during summer.</p> <p>Robert has collected summaries from about 10 GGI members and will publish technical articles on the topic in the English-speaking press. He has received an o.k. from the Transfer Pricing International Journal, who plans to publish it. The International Tax Report is also interested but has asked to enlarge the article from 2,100 words to 5,000 words. Robert will provide that.</p>	Robert Anthony.		
6	<p>Various Recommendations <u>Dr. Robert d’Alessandro</u> As member of GGI Excom, RD thanked Oliver for his continued discipline in maintaining the ITPG success rate, and also thanked the participants for their feedback before during and after each event.</p> <p>- Members Input With a view to better understanding ways of increasing internal network, RD encouraged the group to brainstorm and forward their ideas in writing.</p> <p>- ITPG Matrix Given the success of the first ITPG publication and its value both as an external as well as an internal marketing tool, making the network more interactive, this should be repeated. It is worthwhile as a process of internal communication and sharing standards and knowledge, and also an attractive project in terms of a quality finished product. The following topics are being proposed for</p> <ol style="list-style-type: none"> i. Anti Abuse provisions & Controlled Foreign Corporation ii. VAT challenges iii. Member suggestion <p>- Practitioner notes To exploit the unique level of camaraderie that has now been created, it was suggested that the ITPG meeting should involve a session whereby participants can share with the group important lessons learned from difficulties seen in a particular approach, tax strategy or client. This should take the form of an informal presentation of a couple of minutes as part of each member’s introduction starting a meeting.</p> <p>- Tip of the day How can one develop new business at minimum risk and minimum new investment? Re-examine the priorities of clients and improve their cost benefit value. Give them more and more will come back</p>	Send suggestions	all	

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7	<p>Topics for GGI Insider (ITPG pages)</p> <ul style="list-style-type: none"> - Ashish Bairagra und Ricky Wong - Joint Article "How synergies between members, and especially ITPG members, from Asia and other nations can be developed. Oliver suggests to include Dov Ingber as additional regional chairman Asia into the article. - Oliver Biernat: Short presentation of new regional ITPG Chairpersons - Vasily Malkov - taxation of professional poker players - probably Julia Sugityo <p>As a result the agenda is full. Next chance will be in next Insider. If you are interested to publish an article please contact b.reiss@ggi.com</p>	<p>Send articles to b.reiss@ggi.com</p>	<p>All authors</p>	
8	<p>Venues and dates for 2011 and 2012 ITPG events <u>Next scheduled events are:</u></p> <ul style="list-style-type: none"> - Bogota - Colombia 21 July 2011 09.30 - 17.30 ITPG Meeting (held in English) before Latin American Regional Conference: draft agenda was presented in Munich. - Toronto – Canada 27 October 2011, 14.30. -18.00, ITPG Meeting between North American Conference and World Conference. Bob Simon and Stan Ruchelman as ITPG chairmen Northern America will present suggestions for topics after the summer break - Kuala Lumpur – Malaysia, 16.12.2011 (tbc), ITPG Meeting before Asian Conference - Marbella - Spain, Winter Meeting <u>Draft Agenda:</u> Arrival at 9 Feb. 2012 and dinner with all <ul style="list-style-type: none"> - 10 February morning: PG M&A or PG EBO - 10 February afternoon/evening: excursion and dinner for all - 11 February: ITPG meeting (all day) and dinner in the evening - 12 February departure or individual prolongation <p>Need for registration with the hotel in advance. More details will follow from Santiago Lapausa in time</p>			
9	<p>Closure: Oliver Biernat thanks the speakers and participants and closes the meeting at 18:10.</p>			