

Participants:

Germany	Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft		Biernat	Oliver
Germany	Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft		Rechel-Götz	Astrid
Hong Kong	Wong Brothers & Co. Certified Public Accountants		Wong	Ricky
India	M.L. Bhuwania & Co., Chartered Accountants		Bairagra	Ashish
India	R.N. MARWAH & Company, Chartered Accountants		Marwah	Raghu
Indonesia	PT Asia Indonesia		Gunawan	Francisca T.
Indonesia	PT Asia Indonesia		Sugitypo	Julia
Indonesia	PT Asia Indonesia		Uiharto	Linda
Italy	Dalla Libera & Partners	Dr.	Dalla Libera	Carlo
Romania	Mirus Advisers S.R.L.		Zeche	Ionut Catalin
United Kingdom	Lawrence Grant, Chartered Accountants		Busch	Graham

Agenda

1) Follow-up from past meetings:

Munich. Substance over form topic. 20 questionnaires have been handed in, volume now about 60 pages, which is too extensive for a technical release.

Press release in German media from Oliver Biernat, in English probably by Robert Antony. No volunteers for organising a technical article in English for tax magazines

Discussion on taxation of professional poker players continues via email.

Giovanni Bianchi's presentation on hidden VAT is available on GGI intranet

ITPG Q&A section on GGI intranet available, covering about 80-90% of all questions from new members

2) Tax news, new chances, risks and tax models ITPG members should know

India (by Ashish Bairagra): - Measures to counter unaccounted income / money laundering, example from Ashish about the recent measure introduced by the Indian government through tax provisions, to counter unaccounted income / money laundering. He will publish an article on that in the next Insider. For more details please see his article in the next edition of the GGI Insider or contact Ashish directly.

Germany (by Oliver Biernat): Obligation in Germany for tax consultants to notify suspicion of money laundering and crimes.

Italy (by Carlo Dalla Libera): Something similar in Italy.

3) News from the regions

- Hong Kong by Ricky Wong: Asia Pacific – Hong Kong: Since Aug 2010, Hong Kong has signed comprehensive Double Tax Agreements with Liechtenstein, France, Japan, New Zealand, Switzerland, Portugal and Spain.

4) Marketing Aspects of ITPG

- a) New Format of Skype conference: twice on one day to enable Americans and Asians to participate. Format is appreciated by all participants; time is confirmed to be perfect for all Asia and as well Australia.
- b) Comtax tax planning software has issued invoice for 2011/12. Let's find more participants to reduce the price in the future (decreasing price scale). Ashish and Ricky are checking the conditions to use it. Julia is not interested at the present state of time. Oliver indicates that the present price of 1,556 EUROS (has risen from about 1,300 EUROS according to a reduced number of users) will reduce with more users but still is very favourable (was 24.000 Euros per year and firm before negotiating). Oliver informs about online-presentation of Comtax during the Latin American conference in Bogotá in July; maybe there will be another one in the World Conference in Toronto. Oliver's experience is that the annual costs can be amortised with one chargeable engagement from a client.
- c) Insider ITPG topics: Some authors have already confirmed; Oliver invites others.
 - Ashish writes an article on money laundering (see above)?
 - Robert Anthony on "Substance over Form".
 - Vasily Malkov did not respond on an article of "taxation of professional poker players"
 - Julia Sugitypo considers to write a contribution after her "busy season" for the following issue.
 - Carlos Dalla Libera announces an article for the following issue of the Insider.
 - Oliver will ask American members in the afternoon session.
- d) Oliver informs about the Intax Newsletter on international taxation (twice a week) Interested: Ricky, Ashish, Carlo, Francisca (Graham and Ionut are on). Astrid will send them the link.
- e) Ionut informs about a Brazilian client who asked for tax planning for his group which is present in over 20 countries. By 30 June 2011 a decision shall be taken by the client. "We need a pilot project for testing our joint capacity (no relevance if it is only 10 or 20 countries)." This is the most important aspect of this project as it gives the opportunity to practice.
- f) Ashish also announces a possible project on expatriates in many countries which might bring a common project in different jurisdictions. He will come back to ITPG as soon as things are getting more precise.
- g) Ionut suggests to set up some kind of protocol for making other ITPG members participate in leads somebody has gained in one country and could be spread over other countries.
Precondition is: It has to be formalised in an internal platform in order to react in due course. The question rises if a public platform like LinkedIn could be used? Oliver proposes to discuss this issue in the Leadership Forum in Eisenberg in June 2011.

5) Changes in ITPG membership/chairmen

Sergio Guererro, old and new ITPG regional chairman L.A. is back with new firm in Mexico.
Ricky Wong from Hong Kong new ITPG regional vice-chairman Asia. Ricky presents himself. Willing to cooperate actively as vice-chairperson.

Frédéric Villa from Malta changes his ITPG status from sponsor to visiting member in ITPG. ITPG now has 200 members (39 of them being regular members)

6) Suggestions for topics/presentations for future meetings

a) ITPG meeting in Eisenberg on 16 June 15.30-18.00

- Ionut's proposal: see topic 4g)
- Ashish's proposal: develop a matrix / database of tax regulations for expats employed in various countries, so that when they are assigned / transferred to any other country we can help them with their tax planning and ensure lower tax incidence for the individual. Once the database is established, we can then pitch for International Assignment Service to MNC's and offer them tax planning solutions for their expat employees.

b) ITPG meeting in Bogota on 21 July 2011.

- As nobody of the participants is planning to attend that meeting, this topic shall be dealt in the afternoon session.

c) Toronto World Conference 27 October 2011:

- Graham "Speed dating": 2 members on a 1:1 basis meet in a very restricted meeting, 5-15 minutes per session (tbc), to explain who they are, what they are doing (offering, searching for), and probably quickly collect information about other jurisdictions. Topic suggested for the World Conference in Toronto where many new members are expected to join.
- Toronto programme could be separated into presentation part and speed dating part.

d) IFA meeting, lasting from 11.-16 September 2011 in Paris

- Ionut informs that a member candidate for IFA needs 2 recommendations to be accepted as candidate. He asks which ITPG members are already members of IFA. Ashish's company is; Robert Anthony's as well. Ashish offers to set-up recommendation letters to anybody who is interested in joining. Apparently, this regulation differs from country to country.
- It is easier to publish technical articles as a member of IFA (reknown)
- Carlo Dalla Libera reports that it is a very academic meeting ("many professors"); he questions the practical use of this confederation.
- However, Oliver has also been informed that there are also high ranked representatives from fiscal authorities and politicians as well as CEO and CFO and tax legal representatives of multinational corporations.
- More on <http://www.ifaparis2011.com/> (Main topics: a) Cross-border business restructuring and b) Key practical issues to eliminate double taxation of business income

e) Marbella full day meeting on 10-12 February 2012

Negotiations with hotel are in progress. Very favourable price, if bookings are made well in advance. (Hotel El Fuerte Marbella, www.fuertehoteles.com). Oliver informs about possibility of other PGs to join meeting and about conditions for prepayment. Graham's experience in London was that the majority of registrations will be received 60 days before the meeting; about 10 applications came in in the last two weeks.

Others:

Ashish and Ricky are asked to check if there is another form of communication to reach other Asians members as some companies have expressed doubts about security of Skype. Oliver invites for other suggestions.