

Participants:

France	Anthony & Cie	Prof.	Anthony	Robert
Germany	Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft		Biernat	Oliver
Germany	Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft		Rechel-Götz	Astrid
India	M.L. Bhuwania & Co., Chartered Accountants		Bairagra	Ashish
Italy	COMMA 10 – Commercialisti & Avvocati	Dr.	Finulli	Sergio
Mexico	Guerrero y Santana, S.C.		Guerrero Rosas	Sergio
Mexico	New Corporate Approach S.C.		Motta	Marco
Spain	Javier Carretero y Asociados - Abogados		Lapausa	Santiago
United Kingdom	Citroen Wells Chartered Accountants		Brennan	Nick
United Kingdom	Citroen Wells Chartered Accountants		Kidd	David
United Kingdom	Haines Watts		Moore	Tom
United Kingdom	Haines Watts		Edwards	Stephen
United Kingdom	Haines Watts		Bryant	Julie
United States	Eisner Lubin llp.	Prof.	Simon	Robert
United States	The Ruchelman Law Firm		Prisk	Simon
United States	The Ruchelman Law Firm		Ruchelman	Stanley
Venezuela	Viso, Rodríguez, Cottin, Medina, Ramírez & Asociados		Viso	Angel Gabriel

Agenda

1) Follow-up from past meetings:

Munich. Substance over form topic. 20 questionnaires have been handed in, volume now about 60 pages, available on GGI intranet.

Robert Anthony has written an Insider article in the next edition. Press release in German media from Oliver Biernat. Robert has volunteered to coordinate and distribute a technical article in English for tax magazines if enough ITPG members send him a short (max. 4-5 lines) summary of the highlights in their country. The summary should be brief and not cover basics like the PE definition or OECD model. It needs to identify real new practical evolving issues in the jurisdiction that will be of interest readers. The reader should say: "I wasn't aware of that. I need to contact the author and ask them about it for a client." Please provide Robert's office on naela@antco.com with such a summary if you have filled in the questionnaire before. Please interact before if there are several ITPG members from one country. For the US Robert Simon, for UK: Graham Busch and for Germany I will coordinate. Deadline 15 May 2011.

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 Bairagra 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.

3) News from the regions

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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 the Americas.
- 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). 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. Angel Viso asks for licence price. Angel would like to "sell" it at the Bogotá conference to more users in LA. Oliver informs that new pricing will apply starting July 2012; he will send the price schedule to Angel. Access to the Comtax package is only possible for GGI members; not to invite other companies! 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.
Ashish writes an article on money laundering (see above)?
- Robert Anthony on "Substance over Form" (see above)
Barbara Reiss is back in GGI HQ and is responsible for the GGI Insider. She told Oliver that next edition is quite full but another ½ page (max 3,000 characters including blanks) could be admitted for ITPG pages. It was decided:
Sergio Guererro from Mexico will publish an article for that ½ page
Tom Moore from Haines Watts will contact Barbara and ask if he can issue an additional article on the ITPG pages.

- Vasily Malkov did not respond on writing an article of "taxation of professional poker players" and is therefore excluded from writing an article in this edition.
- d) Oliver informs about the Intax Newsletter on international taxation (twice a week) Members interested shall contact Astrid who will send an example of the newsletter. Oliver underlines that the provider of this service is not known to any of us directly. They are quite aggressive, but perhaps the newsletter is useful.

- e) Ionut informed in the morning session about a Brazilian client who asked for consulting in over 20 countries. By 30 June 2011 a decision shall be taken. "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 is risen 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 Guerrerro, old and new ITPG regional chairman L.A. is back with new firm in Mexico.
- Ricky Wong from Hong Kong ITPG regional vice-chairman Asia.
- Dov Ingber new ITPG regional vice-chairman Asia
- Frédéric Villa from Malta changes 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.
- Robert Simon will suggest some US topic (he will be there personally)
- Oliver proposes to have a focus on marketing topics; how to improve cooperation inside ITPG members since the format of the conference was changed to "Leadership Forum".
- Oliver also informs his proposal to Claudio to offer trainings in soft skills. Could be discussed in Eisenberg outside ITPG meeting.

b) ITPG meeting in Bogotá on 21 July 2011

- Sergio informs about the provisional agenda. He asks if anybody from North America will come and it looks like Steven Cantor will come. Sergio will approach him re. a presentation.
- Angel has been informed there are more European members coming. The final agenda will depend on the participants from LA and the rest of the world.
- By now 10-15 confirmations received at Camilo's office (hosts). Sergio will send out the agenda again.

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

- Some people say it is very theoretical but 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. Please let Oliver know if you plan to go there.

e) Marbella full day meeting on 9-12 February 2012

Santiago Lapausa presents more details on Marbella full day meeting on 9 or 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). We are offered 64 € per night including breakfast for a double room and 51.20 € for a single room.

- Santiago's proposal: Start on Thursday evening with cocktail. Elisabeth Heller and Marco Walser have confirmed to have meetings of their PGs in Marbella as well. Have EBO and M&A meeting on Friday morning. Have a touristic offer on Friday afternoon. Have the ITPG meeting on Saturday.

- Oliver informs about Graham's experience in London: The majority of registrations will be received 60 days before the meeting; about 10 applications in the last two weeks. People usually do not sign-in before having received a draft agenda.

f) Sergio proposes to have an ITPG winter meeting in 2012/2013 in Cancún (Riviera Maya) in México. Oliver replied that he suggests to have elections again for the location of the venue of the full day winter meeting 2012/13 but that it is too early to talk about that now. The general experience has been that people tend to have meetings in Europe as most ITPG members are from Europe. The discussion shall be started before the Marbella meeting (1 year in advance): Have a "competition" to have people voting for one of the places.

g) In summer 2012 there will be a joint meeting of North America and Latin America in Miami. Oliver suggests offering an ITPG meeting there which would surely also attract a lot of people from Europe.