



GENEVA GROUP INTERNATIONAL

**Practice Group International Taxation: Minutes of the ITPG Meeting,
held in Amsterdam, 09 February 2013, 09:00 – 18:00**

Chairman:	Oliver Biernat
Secretary:	Martin Thieslauk

Participants				
Country	Company	Title	Name	First Name
Austria	Grazer Treuhand Steuerberatung GmbH & Partner KG	Dr.	Drawetz	Stefan
Austria	Grazer Treuhand Steuerberatung GmbH & Partner KG		Hofmann	Wolfgang
Austria	Prodinger Hoffmann & Partner Steuerberatung GmbH & Co KG		Leitinger	Manfred
Belgium	Acco Accountants		Cornelis	Sven
Belgium	Acco Accountants		Famaey	Geert
Belgium	Human Capital Services BVBA		Veerle	Triempont
Cyprus	ELIADES & PARTNERS Advocates, Tax & Business Consultants		Christou	George
France	Anthony & Cie	Prof.	Anthony	Robert
Germany	Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft		Biernat	Oliver
Germany	Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft		Thieslauk	Martin
Germany	Kieffer Stübben & Partner Wirtschaftsprüfungsgesellschaft Steuerberatungsgesellschaft		Wierzoch	Bärbel
Germany	Munkert & Partner GbR		Küspert	Klaus
Germany	Nörenberg Schröder Rechtsanwälte Wirtschaftsprüfer Steuerberater Partnerschaft	Dr.	Westerburg	Justus
Greece	Asnetwork		Panou	Jenny
India	M.L. Bhuwania & Co., Chartered Accountants		Bairagra	Ashish
Italy	Balassone Casini Girardi (BCG) Associati, Refidata srl.	Dr.	Girardi	Ugo
Italy	COMMA 10 – Commercialisti & Avvocati	Dr.	Finulli	Sergio
Italy	COMMA 10 – Commercialisti & Avvocati	Dr.	Angheleddu	Andrea
Italy	COMMA 10 – Commercialisti & Avvocati		Cucchi	Simona
Italy	Dalla Libera & Partners	Dr.	Dalla Libera	Carlo
Malta	Advocates CREDAL	Dr.	Gauci	Stefan Patrick
Netherlands	De Keijzer Nipius & Co Accountants B.V.		Everaerd	Hugo
Netherlands	De Keijzer Nipius & Co Accountants B.V.		Bosch	Dirk
Netherlands	De Keijzer Nipius & Co Accountants B.V.		Jaegers	Martijn
Netherlands	Limes International BV		Domburg	Nick
Netherlands	Limes International BV		Kapel	Huub
Netherlands	Limes International BV		Mélotte	Frank
Netherlands	Limes International BV		van Harten	Martin
Netherlands	Limes International BV		Seinstra	Age
Netherlands	Zirkzee & Den Os		Dagevos	Joop

Country	Company	Title	Name	First Name
Netherlands	Zirkzee & Den Os		Den Os	Matthijs
Poland	EFS Group Sp. z o.o.		Plutowski	Artur
Romania	Mirus Advisers S.R.L.		Zeche	Ionut Catalin
Romania	Mirus Advisers S.R.L.		Tutu	Raluca
Spain	Javier Carretero y Asociados - Abogados		Lapausa	Santiago
Switzerland	Eurotrust Partners AG		Valentik	Csaba
Switzerland	Geneva Group International AG		Cocca	Claudio
Switzerland	Walser & Partner AG Freienbach		Wilhelm	Tobias
Turkey	Köksal Law Partnership		Balaban	Havva
Turkey	Köksal Law Partnership		Barutcu	Berrak
United Kingdom	Citroen Wells Chartered Accountants		Brennan	Nick
United Kingdom	Haines Watts Chartered Accountants		Bryant	Julie
United Kingdom	Lawrence Grant, Chartered Accountants		Busch	Graham
United Kingdom	Lawrence Grant, Chartered Accountants		Rajah	Alan
United Kingdom	Lawrence Grant, Chartered Accountants		Shah	Sonal
United States	Rowbotham & Company		Hsieh	Cindy
United States	Rowbotham & Company		Rowbotham	Brian

	Subject	To Do	In Charge	Due Date
1.	09:00 Welcome by the host and the ITPG chairman			
2a	09:15 Mr. Pavel Grishunin (IBFD): Presentation of the IBFD tax platform and special offer from IBFD for GGI members to license it for 20% of the regular price, i.e. 3,000 € instead of 15,000 € annually			
2b	9.45 Report from GGI- IBFD users on their experience after using the IBFD platform for some months (Oliver Biernat, Artur Plutowski, Nick Domburg, Ashish Bairagra). Feedback to IBFD: very useful if you have this kind of engagements where you need to do research in int. taxation.			
3a	10:00 Mr. Luis Nouel (senior researcher from IBFD): The new article 7 of the 2010 OECD Model Convention: Presentation and Discussion, Practical Cases.			
	10:30 Coffee Break			
3b	11:00 Mr. Luis Nouel: Article 7 of the 2010 OECD Model Convention (continued)			
	13:00 Lunch Break in the City Cafe of the hotel			
4.	14:00 Oliver Biernat: Internal topics:			
4a	<p>Presentation of new ITPG regular members (and those who left) has been done in email already. Now we have 61 regular members and 258 visiting members.</p> <p>No longer regular members starting 2013 are: Edwards, Stephen Heller, Elisabeth Smart, James Kutlan, Serhat Haase-Pietsch, Eva Kutlan, Eldem Sugitypo, Julia Budhi, Jimmi Abdel Ghani El-Saeid, Ahmed</p> <p>In 2013 have left GGI: Simon, Robert Ormandi, Peter</p> <p>New regular members starting 2013 are: Rowbotham, Brian Dickey, Doug Dr. Drawetz, Stefan Augustin, Marian Bryant, Julie Sánchez Arrellano, Rodolfo Shao, Tony Girard, Alain Ho, Ben Sanghvi, Haren Robinson, Helen Braun, Steven L.</p>			

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	Hasselman, Toon Kapel, Huub Zinzuwadia, Vijesh			
4b	Changes in ITPG chairs: Stanley Ruchelman steps down as ITPG Vice Chair Northern America and will be replaced by Brian Marita. Oliver thanked Stan and said welcome to Brian.			
4c	Distribution of “Certificates of Attendance 2012: for RMs only. Certificates of RMs that were not in Amsterdam were given to Claudio Cocca for forwarding them to the members.	Send out certificates	HQ	asap
4d	<p>Plan for ITPG guide 2nd Edition 2013:</p> <p><u>Changes:</u> Project starts only if authors have committed to contribute and buy at least 5,000 copies (100 for each). If we allow and find sponsors max. costs per copy should be 5 € plus postage per copy for GGI members, to non GGI members more. Authors from last edition (who just update) have to check at least one other profile. Template will be in word with total min and max characters.</p> <p><u>Sponsors:</u> Acc. to GGI HQ there was an issue last year with members of the ITPG not being happy about the sponsor ads in the book. What is the general opinion now? No sponsors will make the book more expensive. - What about sponsors like airlines, hotels, publishing houses....? - Claudio - no more Swiss banks as sponsors like the last time, the value will be better. - Ashish - the price per book will not really rise by far if there are no sponsors, so we could live without sponsors - Election on this: no sponsors: 3; with sponsors: almost all others - Discussion about banks as sponsors, because they have not the best reputation. A bank, who is not a sponsor will not distribute it to their clients. - Decision: maximum 6 pages for ads from sponsors (if possible no banks)</p> <p><u>Conditions:</u> All authors will have to sign that they agree that their articles can be used forever in this edition, also if they leave GGI (see negative experiences in another PG).</p> <p><u>Time schedule:</u> Now work on framework, agreement for authors and find sponsors, after Lisbon collect articles or amendments, Proof read in June and July, Layout and Print in August and September and presentation in Cancun (at latest in Milan).</p> <p><u>Task force</u> for the book project (apart from global chairpersons): Artur Plutowski, Ashish Bairagra.</p> <p>Suggestion from Huub: shall it be distributed to the public and buying contents? Result after discussion: we will not buy contents.</p>	Work on agreement for authors Find sponsors	HQ	April (Lisbon)

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	<p>The book shall be distributed through the members. It is a special gift for our clients, not for the public. Not as PDF, no more control about it. Book has more value. - Claudio: perhaps single country-profiles as PDF – solution after discussion: no, as well not more control, what will happen with this PDF!</p>			
4e	<p>Ashish Bairagra: ITPG Asia Pacific is ready with the release of the first project on visas and work permits (5 mins.): He presented a Beta version, which is temporarily hosted on his homepage and will be transferred to an ITPG website once it's launched. You can visit www.mlba.in/itpg to review the project results. Other countries from other regions were invited to join and will follow.</p>	Check website		
4f	<p>ITPG film project. After several attempts we received green light from GGI HQ to go ahead with the film, but will not receive any funds or manpower support. We therefore think about an alternative and will let you know as soon as we know more.</p>			
4g	<p>Possible New project (copy from the Real Estate PG): "FYI International Tax News", a client information letter that could e.g. be published quarterly and is designed to be sent by you to your clients. So, unlike the Insider or my ITPG news by email, this will be the first regular ITPG handout from ITPG that is designed for clients!!!</p> <p><i><u>Objectives and Purpose</u></i> <i>The ITPG newsletter is intended to</i></p> <ul style="list-style-type: none"> - <i>show the practice group's resources, strength and international expertise</i> - <i>provide a <u>platform for authors to market their international expert knowledge</u> and to attract clients / potential clients to contact them for further advice.</i> - <i>deliver valuable information for GGI (practice group) members and their staff to get first-hand information at a glance and increase referrals within the practice group and within GGI.</i> - <i>be a marketing tool for the authors. Authors can prove their competence and expertise by making contributions. They can increase their awareness level and shape their profile.</i> - <i>keep your clients and business partners informed and demonstrate them the strength of your international network."</i> - It will only contain <u>short</u> articles from <u>ITPG members</u> that are interesting to <u>international</u> clients. One 1 pager and several ½ pagers. All articles will come with separate box with photo, name and contact data of the author, but the articles itself must not be advertising the authors, member firm or country, but should be strictly technical. - Example please see on GGI homepage: http://www.ggi.com/dynasite.cfm?dssid=5367&dsmid=95100#dstitle_699047 Who would be interested in distributing this to his clients? More than half of the members raised their hands. Who would be interested in contributing as an author at least once a year? More than half of the members raised their hands. Who would like to work in the <u>task force</u> to set this up and help in editing? Task-force: Martin Thieslauk, Artur Plutowski, Nick Brenan, Robert Anthony, Stefan Gauchi, 	Get project started	Martin Thieslauk, Artur Plutowski, Nick Brenan, Robert Anthony, Stefan Gauchi, Ashish, Stefan Drawetz.	

	Subject	To Do	In Charge	Due Date
	<p>Ashish, Stefan Drawetz.</p> <ul style="list-style-type: none"> - Oliver will ensure quality personally as editor in chief, with co-editors. - Approx. costs for layout and second reading: 1,000 € for 10 page letter without printouts. 1,000 printouts will be approx. 500 € for printing plus postage from Switzerland to GGI member plus postage to your clients. <p>Decision: no printing, only electronic form</p>			
4h	<p>Robert Anthony shortly before publication of article with several GGI members as authors, who discussed about trusts in Rome. The Tax Planning International Review will publish about 14 pages (!). Many, many thanks for the coordination in his office and cross reading the articles from the others.</p>			
4i	<p>ITPG Polo Shirt: Cindy Hsieh walked around (on the catwalk) wearing a pattern of a possible ITPG Polo Shirt. Good slogan for the back is needed as Claudio doesn't like: "Tax problems? Ask me! I'm a tax expert". Please send your ideas for a good funny, but for GGI acceptable slogan to Oliver a.s.a.p. 1.st prize: 1 free ITPG Polo Shirt. First ideas from the participants during the conference:</p> <ul style="list-style-type: none"> - I'm in taxtiles, not textiles" Front: "Do you love tax? Back: "I am a tax expert" "I have your tax solution. Ask me. I'm an expert" "International tax issues? Ask Me. I'm an expert" "Worldwide tax solutions? Ask Me. I'm an expert" Front "I am a very BAD tax consultant" Back "This is a very old T-shirt". "I am a beautiful tax solutions expert". 	<p>Please send your ideas for a good funny, but for GGI acceptable slogan to Oliver</p>	all	
4j	<p>Starting the next ITPG Meeting a Feedback Questionnaire from GGI HQ will replace the signature list: Only those members, who fill in the Feedback Questionnaire (every time) will get a credit that they were present which is decisive for e.g regular membership, certificates of attendance, etc. Please fill all in the questionnaires starting in Lisbon!</p>	<p>Fill all in the questionnaires starting in Lisbon</p>	All	
4k	<p>WebEx Meetings: Technically less problems. Acceptance in Europe still poor, in US getting better. Probably thanks to Brian Rowbotham's new concept to have one particular technical tax presentation in each session and market that well in advance. Probably also better because less possibilities for physical GGI meetings in the US. What about Asia and Latin America?</p> <p>Discussion on Web-Ex: Ashish: can the headquarter send reminder for Web-Ex conferences? Robert Anthony: we get too many emails per day... not useful to send a reminder by mail - perhaps to the secretary... Claudio: too many mails from GGI.... perhaps the member will delete reminders without reading them no solution yet</p>			

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41	<p>Outlook on future events:</p> <p><u>Lisbon</u></p> <ul style="list-style-type: none"> - Graham Busch: latest tax developments in the UK of interest to foreign investors or workers - Artur Plutowski: update on Polish joint stock partnership scheme - Steven Cantor: The Latest FATCA Regulations -- The Plot Thickens! - Graham Busch: Speed networking! - Main topic: tbd by Comtax lecturer on international tax topic, including demonstration of Comtax tax planning software <p><u>Eisenberg (managing partners only)</u> Exchange of Experience on managing partner level with leadership topics. No tax topics planned.</p> <p><u>Cancun:</u></p> <ul style="list-style-type: none"> - Peter Wilson (HW): "BRICS and International Taxation". Discussion with representatives from BRIC countries. Establishing a matrix for investors from other countries in the BRICS to show the tax burden on investments and thus multiply their ROI expectations with the national tax rates in order to calculate an ROI after taxes - Graham Busch: Speed networking - Suggestions for presentations/discussions please send to Oliver <p><u>Mumbai:</u></p> <ul style="list-style-type: none"> - Suggestions for presentations/discussions please send to Ashish <p><u>Milan Sergio Finulli (5.-9. March 2014)</u></p> <ul style="list-style-type: none"> - Wednesday: individual arrival at conference Hotel Visconti Palace (near Linate Airport, other Milan airports are far away!) - Wednesday evening: individual dinner at hotel restaurant - Thursday: Full day Ski/(Bob?) excursion to Engadina (probably St. Moritz), lead by Mariagiulia Signori (also for accompanying persons). Transport will be arranged if registration was in time. - Friday morning: individual (or guided) sightseeing/shopping in Milan (tbd) - Friday afternoon: ITPG Meeting (tbd) or various other PG meetings in conference hotel - Saturday: full day ITPG Meeting - Saturday evening: Big, big carnival party with costumes - Sunday: Individual prolongation or departure after breakfast 			
	15:30 Coffee break			
5.	<p>16:00 Technical presentations</p> <ul style="list-style-type: none"> - Julie Bryant: New UK controlled foreign company ("CFC") rules. 15 min - Dr. Stefan Drawetz: "Deep networking" – Presentation of a new international internet solution project. (15 min) - Prof. Robert Anthony: Update on French residential property: wealth tax, cgt, estate duty considerations as well property dependent company transfer duty. (15 min) - Nick Brennan: Changes in taxation of residential property in the 			

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	UK. Effects for foreign investors (15 min) - Brian Rowbotham : US Tax Update and Planning for Foreign Executives in the US (15 min) - Hugo Everaerd : Taxation in Amsterdam (30 min)			
	18:00 End of program: Thanks to hosts and all who made presentations and actively helped to make this happen and for coming to Amsterdam.			