

The International Trust 2009

New trends and developments



Conference Chairman

Mr Alon Kaplan
President of the STEP in Israel
Israel

04 February 2009
Crowne Plaza Hotel
Badenerstrasse 420
8040 Zürich - Switzerland

Speakers

Mr Alon Kaplan (Israel)
President; **STEP in Israel**

Mr Graeme Kleiner (United Kingdom)
Partner; **Speechly Bircham**

Mr St John Robilliard (Channel Islands)
Partner; **Ozannes**

Mr Filippo Nosedà (United Kingdom)
Partner; **Withers**

Mr Michael Fischer (Switzerland)
Attorney at Law; **Froriep Renggli**

Dr Oliver Nesensohn (Liechtenstein)
Partner; **Lorenz Nesensohn Rabanser**

Mr Stanley Barg (United States of America)
Partner; **Duane Morris LLP**

Mr Rogelio Tribaldos-Alba TEP CEO (Switzerland)
Resident Partner, Morgan & Morgan Group;
MMG Panazur Ltd. SA

Kaplex Trust
Company (1978) Ltd.



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Programme

09:00 Welcome speech and introduction

Mr Alon Kaplan (Israel)
President, **STEP in Israel**

09:10 Trustees and Company Directors under Attack: Potential Liability

- . Dealing with the disgruntled beneficiaries
- . Potential vulnerability of directors of trust companies: what next for the so-called "dog leg action"?
- . Exoneration clauses: the last line of defense
- . Seeking the court's guidance in difficult circumstances

Mr Graeme Kleiner (United Kingdom)
Partner, **Speechly Bircham**

09:50 Trustees' Mistakes: How to correct them

- . Common mistakes
- . Putting things right by documentation:
 - who should be parties?
 - how far can the document go?
 - limitations to indemnities
- . Putting things right by the court:
 - mistake as to the nature of an act
 - mistake as to the effect of an act
 - mistake as to the wording

Mr St John Robilliard (Channel Islands)
Partner, **Ozannes**

10:30 Coffee break

10:50 The international foundation scene in trepidation: where are we?

- . A tale of convergence between trusts and foundation jurisdictions
- . Perceived advantages of foundations: myth v reality
- . Founder's rights: Liechtenstein's big U-turn
- . Founder's rights: what other countries are doing
- . Foundation council under increased scrutiny

Mr Filippo Nosedà (United Kingdom)
Partner, **Withers**

11:30 Administration of a Trust company in Israel

- Foreign resident settlor trust
- Underlying Company In Israel
- Pre ruling
- Tax treaties of Israel
- Participation exemption
- Exemption from capital gains
- Other benefits

Mr Alon Kaplan (Israel)
President, **STEP in Israel**

12:10 Question/panel time

12:40 Lunch

14:00 Taxation of trusts in Switzerland and lump sum tax arrangements

- Domestic taxation of trusts
- Trusts and lump sum arrangements
- Availability of Double Taxation Agreement benefits
- Taxation of Swiss trustees and protectors

Mr Michael Fischer (Switzerland)
Attorney at Law, **Froriep Renggli**

14:40 Using Liechtenstein as a trust jurisdiction after the LGT affair

- Political development after the LGT affair
- Tax information exchange agreement with the USA
- Anti-Fraud-Convention with the EU

- Highlights of the new Foundation Law

Dr Oliver Nesensohn (Liechtenstein)
Partner, **Lorenz Nesensohn Rabanser**

15:20 Coffee Break

15:35 Estate Planning for U.S.citizens: Estate and Tax Planning for Europeans holding U.S.assets

- Overview of US tax system: income, estate and gift taxes
- Residency Status
- Imposition of US Estate and Gift Tax
- State and local taxation
- Importance of estate and tax planning
- Use of trusts in estate and tax planning
- Use of Business entities in estate and tax planning

Mr Stanley Barg (United States of America)
Partner, **Duane Morris LLP**

16:20 Panamanian Private Foundations and Trusts in the international Family Estate Planning

- The Republic of Panama, the most stable offshore jurisdiction
- The Panama Trust, an Anglo-American hybrid
- The Panama Private Foundation, a success story
- Family Estate Planning using Panamanian vehicles

Mr Rogelio Tribaldos-Alba TEP CEO (Switzerland)
Resident Partner, Morgan & Morgan Group, **MMG Panazur Ltd.S A**

17:00 Q&A session

17:20 Close of the conference

Financial Events *International*

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February 4th 2009 Crowne Plaza Hotel - Badenerstrasse 420. 8040 Zürich - Switzerland

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