

## NEW OECD

# TAX DISCLOSURE INITIATIVES

Steering your wealth out of the storm: **Situation in Switzerland and other** low tax jurisdictions

23 - 24 November 2009, Hotel Royal, Rue de Lausanne 41, **Geneva**, Switzerland



Conference Chairman  
**Mr. Alon Kaplan TEP**  
President  
**STEP - Israel**

## Speakers

**Mr. Alon Kaplan TEP** (Israel)  
Attorney at Law; **Alon Kaplan Law Firm**  
President; **STEP - Israel**

**Mr. Meir Linzen** (Israel)  
Managing Partner; **Herzog, Fox, Neeman**  
Chairman; **STEP - Israel**

**Mr. Warren Whitaker** (United States of America)  
Partner; **Day Pitney**  
U.S. Chair, member of the Worldwide Council; **STEP**

**Mr. Stanley A. Barg** (United States of America)  
Partner; **Duane Morris LLP**  
Vice Chairman; **STEP - New York chapter**

**Mr. James J. Holman** (United States of America)  
Partner; **Duane Morris LLP**

**Dr. Yehuda Shaffer** (Israel)  
Director; **Israel Money Laundering Prohibition Authority**

**Mr. Paul Matthams** (Jersey)  
Partner; **Carey Olsen**

**Mrs. Olga Boltenko** (United Kingdom)  
Counsel; **Hogan & Hartson**

**Mrs. Justine Markovitz TEP** (Switzerland)  
Partner; Geneva Office Managing Director; **Withers LLP**

**Mr. Ronnen Gaito** (Luxembourg)  
**Elvinger Dessoy Dennewald**

**Mr. Manuel Liatowitsch** (Switzerland)  
Partner; **Schellenberg Wittmer**

**Mr. Pericles Spyrou** (Cyprus)  
Manager, Corporate Services; **Bonalbo**

**Dr. Ludovic C. Verbist** (Switzerland)  
Managing Director; **AAMIL (Swiss) S.A.**

**Mr. Dani A. Kuzniecky** (Panama)  
Senior Partner; **Kuzniecky & Co**

**Mr. Isaac Marrache** (Gibraltar)  
Partner; **Marrache & Co**

## Topics developed:

- .Banking secrecy, present and future: how does it affect Switzerland?
- .How to deal with European saving tax directives?
- .Could US entities be used by non US persons as convenient tax efficient legal entities?
- .Legal environment of tax in Luxembourg, Cyprus, Switzerland, Russia, Israel, United Kingdom and United States of America
- .Creating a tax holiday by immigration
- .Choice of international jurisdictions and vehicles by capital exporting countries
- .New wealth management structures
- .Money laundering prohibition regulations and trustees' work

## Countries covered:

- .Switzerland
- .USA
- .Gibraltar
- .Cyprus
- .Panama
- .Luxembourg
- .Russia
- .Israel
- .United Kingdom
- .Mauritius
- .Jersey

## Who should attend:

- .Family officers
- .Wealthy family members
- .Private bankers
- .Tax lawyers
- .Attorneys at law
- .Wealth and tax planners
- .Trust officers
- .Etc.



Euro Professional Trustees AG

## Programme - Day 1

09:00 Welcome speech and introduction

**Mr. Alon Kaplan TEP**  
Attorney at Law  
**Alon Kaplan Law Firm**

09:10 Israel as a trust administration jurisdiction

- Legal system short presentation
- Law of trust and law of inheritance
- Tax considerations
- Using Israeli companies for management of trusts from various jurisdictions



**Mr. Alon Kaplan TEP**  
Attorney at Law  
**Alon Kaplan Law Firm**

09:50 The Jersey Foundation

- A civil law vehicle for a trusts jurisdiction
- Key features and requirements - including membership of the council, the guardian and issues concerning redomiciliation of foundations from other jurisdictions
- Comparison with a trust



**Mr. Paul Matthams**  
Partner  
**Carey Olsen**

10:30 Coffee break

10:50 The Cyprus Holding Company - a versatile tool in estate planning

- Introduction to Cyprus and its tax system
- Why use a holding company?
- Why are the merits of a Cyprus holding company?
- Forthcoming developments



**Mr. Pericles Spyrou**  
Manager, Corporate Services  
**Bonalbo**

11:30 Tax benefits granted to immigrants to Israel and returning expatriates & Estate Planning for US and UK families in Israel

**Mr. Meir Linzen**  
Managing Partner  
**Herzog, Fox, Neeman**

12:10 Lunch

14:00 Trusts and divorce



**Mrs. Justine Markovitz TEP**  
Partner, Geneva Office Managing Director  
**Withers LLP**

14:40 Luxembourg bank secrecy

- The legal basis for bank secrecy in Luxembourg
- Bank secrecy law and practice
- Implications of the recent developments on bank secrecy in Luxembourg



**Mr. Ronnen Gaito**  
**Elvinger Dessoy Dennewald**

15:20 Coffee break

15:40 Bank Secrecy in Switzerland, present and future developments

- The year in review
- The lessons of U.S. vs. UBS
- Switzerland's new tax treaties
- The future shape of Swiss banking secrecy



**Mr. Manuel Liatowitsch**  
Partner  
**Schellenberg Wittmer**

16:20 US Trusts and Companies in International Planning - What's All the Fuss About Delaware?

- Classification of Business Entities in the US
- Determination of When a Trust is a US Trust for Tax Purposes
- Check the Box Rules
- General Advantages of Private Wealth Management in Delaware
- Opportunities for Foreign Trustees and Advisors in Delaware
- The Delaware Court of Chancery

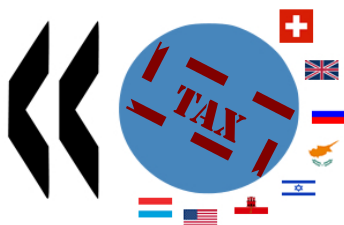


**Mr. Stanley A. Barg**  
Partner  
**Duane Morris LLP**



**Mr. James J. Holman**  
Partner  
**Duane Morris LLP**

17:00 Refreshments - End of Day 1



## Programme - Day 2

### 09:00 Welcome speech and introduction

**Mr. Alon Kaplan TEP**  
Attorney at Law  
**Alon Kaplan Law Firm**

### 09:10 Money laundering prohibition regulations and trustees' work

**Dr. Yehuda Shaffer**  
Director  
**Israel Money Laundering Prohibition Authority**

### 09:50 Recent new and proposed US legislation and government initiatives aimed at offshore private wealth transactions

- Expatriation
- Stop Tax Haven Abuse and similar proposals
- Voluntary disclosure
- FBAR filings



**Mr. Warren Whitaker**  
Partner  
**Day Pitney**

### 10:30 Coffee Break

### 10:50 The EU Savings Taxation Directive:

- Philosophy and purpose
- The Directive
- Application
- The First Revision
- The Future



**Dr. Ludovic C. Verbist**  
Managing Director  
**AAMIL (Swiss) S.A.**

### 11:30 Estate planning for wealthy Russians: use of European, Israeli and offshore wealth management vehicles

- Current Russian wealth management issues
- International tax structuring for Russian wealthy families and successful entrepreneurs
- Do you speak "trust"? Russian law and practice
- My wealth management tools are working now, but what about tomorrow?
- Expected developments in Russian tax law



**Mrs. Olga Boltenko**  
Counsel  
**Hogan & Hartson**

### 12:10 Lunch

### 14:00 The important development of the pressure of OECD on Panama

**Mr. Dani A. Kuzniecky**  
Senior Partner  
**Kuzniecky & Co**

### 14:40 Current state of play with regards to tax information agreements



**Mr. Isaac Marrache**  
Partner  
**Marrache & Co**

### 15:20 Refreshments and close of the conference

**TAX PLANNING** new OECD tax disclosure initiatives - Steering your wealth out of the storm: Situation in Switzerland and other low tax jurisdictions

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