

AGENDA
TTN Conference Prague 2009
Hotel Boscolo Carlo IV
Senovazne Namesti 13, 11000 Prague, Czech Republic



Friday, 25 September 2009

- 08.30 - 08.50 Welcome with coffee and tea.
- 08.50 - 09.00 Welcome address by James Walfenzao, TTN President.
- 09.00 - 09.25 Czech economy: recession and the way out.
Václav Okleštěk, Euro-Trend Group, Czech Republic, voklestek@eurotrend.cz
- 09.25 - 09.50 Czech and Central European planning techniques and structures.
Henk Goossen, Cee Tax Management, Czech Republic, henk.goossen@ceetax.com
- 09.50 - 10.15 Legal / Tax issues regarding Czech clients in international transactions.
Daniel Rejman, Mgr. Daniel Rejman, Czech Republic, counsel@rejman.cz
- 10.15 - 10.40 International taxation from perspective of the Czech Tax Administration.
Michal Rohacek, Head of Direct Taxes International Cooperation Division
of the Ministry of Finance, michal.rohacek@mfcf.cz
- 10.40 - 11.00 Coffee and tea break.
- 11.00 - 11.25 Estate planning in the USA for foreigners.
Helio Rocha, AXA advisors, USA, helio.rocha@axa.advisors.com
- 11.25 - 12.25 TTN Tax Prize 2009: Presentations on Problems with Permanent Establishments.
- (Sequence of presentations will be determined by tossing of a coin during the preceding coffee and tea break)
- The finalists are:
Cormac Kelleher from Ireland & Tiiu Alban from Estonia
- 12.25 - 13.30 Lunch break.
- 13.30 - 13.45 Announcement winner of the TTN Tax Prize 2009 by the President of the Jury of the TTN Tax Prize, John Graham.

- 13.45 - 14.10 Structuring international investment funds.
Miles Dean, Milestone International Tax Consultants Ltd., United Kingdom, miles@milestonetax.com
- 14.10 - 14.35 Some alternatives for blacklisted jurisdictions; working around black and grey lists.
Ewout Langemeijer, The Corpag Group, USA, ewout@corpag.com
- 14.35 - 15.00 The new UK-Dutch tax treaty.
John Graham, Graham Smith & Partners, The Netherlands, graham@grahamsmith.com
- 15.00 - 15.30 Coffee and tea break.
- 15.30 - 15.55 US - European tax matters: limitation of benefits, treatment of partnerships etc.
Peter Kirpensteijn, Kiveld International Lawyers, The Netherlands, pk@kiveld.nl
- 15.55 - 16.20 US FBAR Filing Requirements.
Steven H. Hagen, Harper Meyer Perez Hagen O'Connor & Albert LLP, shagen@harpermeyer.com
- 16.20 - 17.20 IBFD presentation and case study.
International Bureau of Fiscal Documentation, The Netherlands
- 17.20 Closing of the meeting
- 17.20 - 17.30 Coffee and tea break.
- 17.30 - 18.00 Annual General Meeting (only for TTN members).
- 18.00 - 18.30 Feedback Session (only for TTN members).

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- 19.30 - Cocktails and dinner at Restaurant Mlýnec
Novotneho Lavka 9, Old Town: in walking distance of the hotel



At Mlýnec, Prague's top restaurant, you will enjoy an unique drama at your table written by Marek Purkart, the first Czech chef to receive the Michelin "Bib Gourmand" award three times.

Dress code for conference and dinner: smart casual (no tie).