

AGENDA

TTN Seminar New York 2010

Morgan Lewis Bockius LLP

101 Park Avenue, Telephone number + 1 212 309 6000



Monday, 17 May 2010

- 08.45 - 09.00 Welcome with coffee and tea.
- 09.00 - 09.10 Welcome address by James Walfenzao, TTN President.
- 09.10 - 09.35 Foreign investment in US real estate – current trends.
Christopher J. Byrne, CPA and Attorney, USA, cjbyrne1@optonline.net
- 09.35 - 10.00 Investing in Canada – some basics.
Roger J. Ramonat, Doucet McBride LLP, Canada, rramonat@doucetmcbride.com
- 10.00 - 10.25 Partnerships/Hybrids from a European perspective.
Peter Kirpensteijn, Kiveld International Lawyers, The Netherlands, pk@kiveld.nl
- 10.25 - 10.50 Concepts of tax havens jurisdictions and privileged tax regimes under Brazilian fiscal law.
Jérôme Stéphane van Staden, Ernst & Young, Brazil, jerome-van.staden@br.ey.com
- 10.50 - 11.10 Coffee and tea break.
- 11.10 - 11.35 Foreign trusts for US family members: Use of section 645 election.
Michael Legamaro, Morgan, Lewis & Bockius LLP, USA, mlegamaro@morganlewis.com
- 11.35 - 12.00 Central European developments.
Henk Goossen, Cee Tax Management, Czech Republic, henk.goossen@ceetax.com
- 12.00 - 12.25 Mexican private equity investments.
Alejandro Reyes Santoyo, Chevez Ruiz Zamarripa, Mexico, asantoyo@chevez.com.mx
- 12.25 - 13.30 Lunch break.
- 13.30 - 13.55 The changing tax landscape for multi-national companies.
Gary Wilcox, Morgan, Lewis & Bockius LLP, USA, gwilcox@morganlewis.com

- 13.55 - 14.20 Dutch foundations and white list update.
Ewout Langemeijer, The Corpag Group, USA, ewout@corpag.com
- 14.20 - 14.45 Exchange of information.
John Graham, Graham Smith & Partners, The Netherlands, graham@grahamsmith.com
- 14.45 - 15.10 Thin Cap and Delaware from a Brazilian perspective.
Giancarlo Matarazzo, Pinheiro Neto Advogados, Brazil, gmatarazzo@pn.com.br
- 15.10 - 15.30 Coffee and tea break.
- 15.30 - 15.55 A discussion of the 'Foreign Account Tax Compliance Act' ('FATCA') provisions that have been incorporated into the recently enacted 'Hiring Incentives to Restore Employment Act' (the 'HIRE Act').
John Narducci, Orrick, Herrington & Sutcliffe LLP, USA, jnarducci@orrick.com
- 15.55 - 16.20 DTA's and anti-abuse measures: The Argentine case.
Walter C. Keiniger, Marval, O'Farrell & Mairal, Argentina, wk@marval.com.ar
- 16.20 - 16.45 Immigration into the US – available visas and tax consequences.
Steven H. Hagen, Harper Meyer Perez Hagen O'Connor Albert & Dribin LLP, shagen@harpermeyer.com
- 16.45 - 18.30 Cocktail.

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