2ND ANNUAL CONFERENCE

LATIN AMERICAN PRIVATE CLIENTS

Reinventing tax & estate planning structures & solutions for Latin American families in the new transparent context

BRAZIL, ARGENTINA, MEXICO, VENEZUELA, COLOMBIA, PERU, URUGUAY

- **FOCUS ON BRAZIL, ARGENTINA AND MEXICO**
  - Exchange of tax information with Latin American jurisdictions
  - Recent and upcoming tax reforms in Latin America
  - Trusts and foundations for Latin American private clients
  - Luxembourg, Panama and Spain structures
  - How to repatriate offshore funds to invest in Latin America?
  - Asset protection for Latin American private clients
  - What are the compliant optimal structures for Uruguayan, Peruvian, Colombian and Venezuelan private clients?

- **12 JUNE: AFTERNOON WORKSHOP ON DUE DILIGENCE**
  Organized crime, corruption, money laundering: how to distinguish the legitimate fortunes from the criminal methods of enrichment?

10-12 June 2013, Geneva, Grand Hotel Kempinski
MONDAY 10 JUNE 2013

8.50 | Welcoming speech

9.00 | Alessandro Amadeu da Fonseca, Partner, Mattos Filho, Veiga Filho, Marrey Jr e Quiroga Advogados, Sao Paulo

9.40 | Leila Szwarc, CITCO, Nyon

10.20 | Mauricio Bravo Fortoul, Partner, Turanzas, Bravo & Ambrosi, S.C., Mexico

11.25 | Andres Luis Halvorssen Villegas, Raffalli de Lemos Halvorssen Ortega y Ortiz, Caracas

12.05 | Elizabeth von Werra, Founder & Managing Partner, BRAZFIN, Zurich

12.30 | Dani Kuzniecki, Founder, Kuzniecky & Co, Panama

14.00 | Murilo Mello, Partner, KPMG, Sao Paulo

16.15 | Coffee break

16.35 | Speaker to be confirmed

17.35 | End of the first day of the conference

RIISING ISSUES FOR LATIN AMERICAN CLIENTS

Reinforcement of measures against tax avoidance and tax fraud in Latin America: the example of Brazil
Presentation of the new law regarding anti laundering, fraud and sham for tax purposes? What are its consequences?

The exchange of information with Latin American jurisdictions
Which tax information may be exchanged? Do Latin American jurisdictions really ask for the exchange of information?

Coffee break

Cross border issues: which financial products can be sold to the Mexican clients?
Which products may be sold to declared Mexican clients? Which ones are in the grey zone for declared Mexican clients? How to approach Mexican clients?

Asset Protection for Latin American clients: the Venezuelan example
Expropriations and confiscations in Venezuela: recent trends
Legal framework of investment protection: treaties and internal legislation; international arbitration; administrative and court procedures
Regulatory restrictions: Exchange control regime, price controls, governmental authorizations
Confidentiality issues: regulatory environment, personal security
Compliant vehicles for asset protection: case studies

Offshore Funding services for Brazilian entrepreneurial families and individuals
Balance sheet structure of Brazilian mid-sized businesses
Availability and costs of local long-term financing for Brazilian family businesses
Challenges and trends in locally funding family businesses
Preventing repatriation of clients’ assets by providing offshore funding services
Offshore funding services as a differentiating factor

Lunch

Why will Panama remain an essential jurisdiction for Latin American clients in a transparent world?
The Panama Hub (Financial, Geographical and Logistical, advantages)
The flexibility of the Panama Structures
New Bearer Shares Custodian Regime
Update KYC and Due Diligence
Exchange of Information based in Treaties signed by the Republic of Panama

BRAZIL

Compliant tax planning solutions for Brazilian clients
Application of the Brazilian general anti-avoidance rules under the National Tax Code (“CTN”) and Civil Code (Law 10,406/2002) provisions
Existing tax measures for combating “tax evasion” such as the new transfer pricing rules (Law 12,715/2012 and IN SRF 1,312/2012), thin cap rules (Law 12,249/2012) and low tax jurisdictions - privileged tax regimes (IN SRF 1,037/2012)
Tax up dates regarding new double tax treaties and MERCOSUR free trade

Coffee break

Estate planning strategies for the inheritance and divorces of private Brazilian clients
What are the efficient structures to protect Brazilian spouses and children?

GALA DINNER

FOUR SEASONS HOTEL DES BERGUES AT 7.30 PM
8.50 |  

9.00 | Diogo Duarte de Oliveira, Partner - Tax, Avocat, CMS DeBacker Luxembourg, Luxembourg

9.45 | Nicolas Malumian, Partner, Malumian & Fossati, Buenos Aires  
Leandro Caceres, Partner, Brons & Salas Abogados, Buenos Aires

11.15 |  

11.45 | Javier Canosa, CEO, Canosa Abogados, Buenos Aires

12.30 |  

14.00 | Matias Jimenez-Brito, Partner, Jiménez-Brito Abogados & Asesores Tributarios, Las Palmas de G.C.

14.45 | Mauricio Bravo Fortoul, Partner, Turanzas, Bravo & Ambrosi, S.C., Mexico  
Luis Gerardo Del Valle, Founding Partner, Del Vall Torres S.C., Mexico

16.15 |  

16.35 | Elias Bitar, Partner, Tron Abogados. Mexico

17.35|  

Welcoming speech

How to use Luxembourg structures for the tax planning of Latin American clients?  
Trusts, life insurance contracts, specialized investment funds... which vehicle to be used?

ARGENTINA

Tax and estate planning solutions for Argentinean clients
What are the recent Argentinean tax updates?  
Which are the relevant trends? What to expect in the future?  
How to choose a jurisdiction and vehicle for Argentinean investments considering blacklisted jurisdictions and tax treaties?  
Relevant rules for investments in Argentina for private clients (FX rules, restriction to participation in Argentine companies, restrictions to rural land areas, KYC rules on bank accounts)

Coffee break

Estate planning strategies for the inheritance and divorces of private Argentinean clients
Double taxation treaties: trends and developments.  
Treaties for the exchange of tax information, status, trends and developments.  
OECD Multilateral Convention on Mutual Administrative Assistance on Tax Matters.  
Reporting requirements for trusts set up overseas.

Lunch

Spain as a key gateway for inbound investments in Latin American jurisdictions and in Europe for Latin American clients
For which Latin American clients should Spanish structures be used?  
For which European jurisdictions should Spanish structures be used for the investments of Latin American clients

MEXICO

Tax and estate planning solutions for Mexican clients
Current economic and tax environment in Mexico  
Investment opportunities in Mexico.  
Asset protection alternatives  
Tax and exchange of information treaties  
Current Mexican CFC Regime  
Trusts, Foundations & Insurance wrappers  
Mexican culture and psychology to consider wealth planning solutions  
Alternative wealth planning solutions for Mexican clients

Coffee break

Estate planning strategies for the inheritance and divorces of private Mexican clients
Which technical aspects must be complied with in order to ensure a tax free succession in Mexico?  
What are the Mexican tax implications of tax free successions usually implemented for US persons or US property purposes?  
Requirements for the enforceability of prenuptial agreements and other estate related matrimony regimes celebrated abroad when residing in Mexico  
Which matrimony estate regimes exist in Mexico and its advantages and disadvantages from an Estate Planning and taxation point of view?

End of the second day of the conference
SESSION A
WEDNESDAY 12 JUNE 2013

8.50 | Welcoming speech

9.00 | Andres Luis Halvorssen Villegas, Partner, Raffalli de Lemos Halvorssen Ortega y Ortiz, Caracas
Federico Araujo Medina, Founding Partner, Torres Plaz & Araujo, Caracas

10.30 | Coffee break

11.00 | Speaker to be confirmed

12.30 | Lunch

14.00 | Patricia Arrazola Jaramillo, Founding Partner, Arrazola & Asociados, Bogota
Alfredo Lewin, Partner, Lewin & Willis, Bogota

15.30 | Coffee break

15.50 | Silvia Solé Cestau, Attorney at Law, Estudio Dr. Luis Alberto Solé–Romeo, Montevideo
Patricio José Martinelli Brito, Partner, Bragard & Duran, Montevideo

17.20 | End of the Session A

### VENEZUELA, PERU, COLOMBIA, URUGUAY

**Compliant and tax efficient structures for Venezuelan clients**
- Relevant Venezuelan taxes and current rates.
- Case studies
- Tax reform: new financial transactions tax, changes in income tax, VAT

**Income Tax Treaties**: existing network, exchange of information issues, recent trends.

**Which tax and estate planning solutions are the most efficient for Peruvian clients?**
- What are the recent Peruvian tax updates? Which ones may be expected in the forthcoming months?
- How to choose a jurisdiction for Peruvian investments? Comparative analysis and description of useful vehicles to be used for Peruvian clients
- How to structure the tax planning of Peruvian clients located in and outside Peru?
- Case studies

**International tax and estate planning solutions for Colombian clients**
- Recent changes of the resident concept for individuals
- Realization of Income
- Recent changes of the Capital Gains Tax
- Legal solution for Undeclared Assets
- Updates on black lists (or the absence of?)
- Foundations and trusts: tax efficiency and recent changes
- Case presentation: the risks of local and international litigation of tax efficient structures vs. forced heirship provisions
- Recent treaties and their impact on structures

**Which tax and estate planning solutions suggest for your Uruguayan clients?**
- Brief description of Uruguayan tax system, fiduciary law, inheritance law, migration law, anti-money laundering legislation
- How source base income and wealth taxation system provides planning for Uruguayans and foreigners?
- General characteristics and taxation of Uruguayan companies
- Why and how are Uruguayan companies used by Uruguayans and foreigners?
- Taxation of Uruguayan trusts
- How are Uruguayan trusts used by Uruguayans and foreigners?
- Taxation of resident individuals and special tax treatment for new tax residents
- Why are foreigners migrating to Uruguay?

### How to register

- by phone: +41 (0) 22 849 01 11
- by fax: +41 (0) 22 849 01 10
- by e-mail: info@academyfinance.ch
- by post: Academy & Finance SA
  PO Box 6069, CH-1211 Geneva 6
  www.academyfinance.ch

### Registration Fees

- for 10, 11 & 12 June (gala dinner incl.): CHF 3590
- for 10 & 11 June (gala dinner incl.): CHF 2790
- for 10 June (gala dinner incl.): CHF 1590
- for 11 June only: CHF 1350
- for 12 June only: CHF 1350

These prices do not include the Swiss VAT (+8%).

### Discount

- If there are two or more attendees from the same institution, a 10% reduction of the fees may be claimed for the second and the third registration.
SESSION B
WEDNESDAY 12 JUNE 2013

8.50 | Welcoming speech

TRUSTS & FOUNDATIONS FOR LATIN AMERICAN CLIENTS

9.00 | Are trusts and foundations good vehicles for Brazilian clients?
Alessandro Amadeu da Fonseca, Partner, Mattos Filho, Veiga Filho, Marrey Jr e Quiroga Advogados, Sao Paulo

How are trusts and foundations recognized by Brazilian tax authorities?
Which trusts and foundations should be created for Brazilian clients?

10.00 | How to use trusts and foundations for Argentinean clients?
Nicolas Malumian, Partner, Malumian & Fossati, Buenos Aires

How are trusts and foundations recognized by Argentinean Authorities? Relevant case law
Which are the requirements for trusts and foundations to be tax effective and compliant?

11.00 | Are trusts and foundations efficient vehicles for Mexican clients?
Luis Gerardo Del Valle, Founding Partner, Del Vall Torres S.C., Mexico

Brief overview of CFC Regime
Mexican tax implications of using trusts and foundations.

Coffee break

11.30 | Are trusts and foundations efficient vehicles for Mexican clients?
Luis Gerardo Del Valle, Founding Partner, Del Vall Torres S.C., Mexico

Brief overview of CFC Regime
Mexican tax implications of using trusts and foundations.

Lunch

DUE DILIGENCE FOR LATIN AMERICAN CLIENTS

12.30 | Organized crime, corruption, money laundering: how to distinguish the legitimate fortunes from the criminal methods of enrichment?
Octavio Betancourt Montoya, Managing Director, Milersen LLC, Coral Gables
Ira Morales Mickunas, Managing Director, Milersen LLC, Coral Gables

Latin America – Bird’s Eye View Changes in the region that impact business positively or negatively; cultural characteristics that are fundamental for business rapport
Country Specifics (Venezuela, Mexico, Colombia, Peru, Argentina)

14.00 | Typologies, cases and scandals and more
Octavio Betancourt Montoya, Managing Director, Milersen LLC, Coral Gables

The Anatomy of a Potential Scandal (Signs that point out to potential problems; what to avoid; how to remedy a problem)
Due Diligence and Enhanced Due Diligence as a MUST

17.30 | End of the Session B
REGISTRATION FORM

You can also register by telephone: +41 (0)22 849 01 11

Conference & Gala Dinner
I register for the Latin American private clients conference and I choose:
☐ 10, 11 & 12 June + Gala Dinner  ☐ 10 & 11 June + Gala Dinner
☐ 10 June + Gala Dinner  ☐ 11 June only  ☐ 12 June only

Choice of seminars on 12 June
I choose:  ☐ Session A  ☐ Session B

Accommodation
☐ Please send me the hotel booking form with preferential rates

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Position

Company

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Postcode  City  Country

Tel  Fax

Mobile  E-mail

Special dietary requirements (if any)

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Card No / / /  Expiry Date / /  

Name of card holder

Address of AMEX card holder

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Date  Signature

The organisers reserve the right to change the programme if, despite their best efforts, circumstances oblige them to do so.