2010 International Wealth and Tax Planning Seminar

May 3 - 7, 2010
Seehotel Hermitage, Lucerne, Switzerland

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CFA Institute

Objective

Wealth owners currently find themselves in a challenging and globalized financial environment. This places ever greater demands upon those who must deliver timely and technically sound advice on domestic and international wealth planning opportunities.

The 7th International Wealth and Tax Planning Seminar provides a structured treatment of international tax and estate planning, including an examination of potential pitfalls. As you will see from our faculty profiles, we have assembled some of the most qualified and influential experts in the field to guide you.

The 5 day residential seminar presents:

- Principles of national and international (double) taxation
- Principles of wealth planning structures, e.g. trusts, partnerships, holding companies
- Application of these principles to British, German, French, Italian, Belgian and Spanish jurisdictions

Attendees are placed at the center of a rich and conducive learning environment composed of lectures and group discussions.

Target Audience

Past attendees at this exclusive seminar have included relationship managers in private banking, lawyers, representatives of trusts and family offices and independent asset managers.

Those seeking to work more effectively with specialist national advisors will find the seminar particularly valuable.

Carlo Galli is partner at Clifford Chance and head of the firm's Italian tax department since 2009. He was admitted to the Association of Chartered Accountants (Ordine dei Dottori Commercialisti) in 1996. Prior to joining Clifford Chance he worked 13 years with Maisto e Associati, an Italian tax law firm, of which he has been a partner since 2003, after having worked with the IBFD in Amsterdam for two years. He is specialized on taxation in the capital markets, private equity structures and estate and tax planning for private individuals.

Line-Alexa Glotin is an attorney of counsel at the Paris based law firm UGGC & Associés. She graduated in law from the Paris II – Panthéon Assas University. She advises an international clientele of wealthy families, family offices and private banks in the areas of domestic and international taxation, estate planning, trust, fiducies, family foundations and charities. Before joining UGGC & Associés in 2000, she worked as an associate for Taj (Deloitte & Touche).

Fabricio González is currently working as a lawyer in the structuring advisory team of Credit Suisse Trust Ltd. Before he was an associate in the Zurich office's Tax Practice Group of Baker & McKenzie and a member of the Steering Committee of its European Private Banking practice. His practice is focused primarily on international private banking, wealth management and tax planning for family businesses. He has published extensively in specialized tax and private banking newsletters and journals. Mr González participates at the courses of STEP, Switzerland, and is a lecturer at the University of Barcelona, at Barcelona Bar Association and at ESADE-Ramon Llull University of Barcelona.

Dr Marc Jülicher is partner at Flick/Gocke/Schaumburg, a law firm specialised in tax, and was admitted to the bar in 1995. He is lecturer at the Bundesfinanzakademie (German Federal Finance Academy), at the ZHAW Zürcher Hochschule für Angewandte Wissenschaften (School of Management and Law) and Member of the German Estate Planning Association (DVEV), the Institute for Inheritance Law (IFE), the German Tax Lawyers (DStJG) and the German-South African Lawyers Association (DSJV). He received his PhD from the University of Cologne in 1992, and is co-editor of the Journal of Tax and Inheritance Tax Law and co-author of Troll/Gebel/Jülicher, ErbStG (Inheritance Tax Code) and Debatin/Wassermeyer, DBA (Double Taxation Treaties).

Philip Marcovici is CEO of LawInContext Pte. Ltd, the interactive knowledge venture of Baker & McKenzie. He retired as a partner of Baker & McKenzie at the end of 2009 after 28 years with the Firm. Based in Hong Kong and Zurich, he was one of the founders of the Firm's Global Wealth Management practice, as well as of its Asian tax practice. Among other management roles, he was the chair of the Firm's Global Private Banking Steering Committee and of its European Tax practice. He is active in working with families, governments and banks worldwide and has been an honorary lecturer at the law school of Hong Kong University and the University of Zurich law faculty. He is an active member of the tax sections of both the American and the Canadian Bar Association.

Dr Kurt Moosmann is Co-Founder and Managing Partner of Dara Capital Ltd., a competence center for international investors, dedicated to providing sophisticated and comprehensive wealth advisory and investment solutions. He is an acknowledged specialist in structuring wealth of private entrepreneurs, business owners and high net worth individuals, and he has worked in executive positions for various financial institutions before founding Dara Capital. Dr Moosmann holds an MBA from Carnegie Mellon University and the University of Geneva, is a member of STEP and a regular lecturer on international wealth management topics. He is also the Co-Chairman of the Family Office Roundtable, a global think-tank for large entrepreneurial families.

Dr Marc-Etienne Pache is partner at Oberson Avocats in Lausanne/Geneva. He graduated from University of Lausanne School of Law with a doctorate in law and earned an LL.M. in Taxation in the USA. Admitted as a certified tax expert, he is active in Swiss and international taxation and regularly advises companies on re-organizations and tax planning. He is also active in the area of tax assistance and planning to individual taxpayers. Dr Pache also serves as an associate judge in charge of tax affairs at the Cantonal Court of Vaud. He is a member of the Vaud Bar Association and the Certified Tax Expert Association.

Fouad Sayegh is an attorney at Oberson Avocats in Geneva and is admitted to the Swiss and New York Bars. He also serves as an associate judge on the Geneva Court of Appeal for Tax Matters. He graduated from the University of Geneva School of Law and obtained an LL.M. in International Taxation from New York University School of Law. His practice concentrates on Swiss domestic and international taxation, both for individuals and corporate entities, with an emphasis on trusts and high net worth private clients. He is a member of the New York State Bar Association and the International Fiscal Association.

Rupert Ticehurst is partner at Herbert Smith and head of its international private wealth & charities practice. He acts for private banks, trust companies, high net worth individuals and charities in relation to trust, succession planning, philanthropy and UK tax planning. He has a BA from Queen Mary College, London University, an LL.M. from the London School of Economics and used to teach law at King's College, London University.

Prof Anton R. van Zantbeek is an attorney at Greenille (Brussels, Antwerp & Rotterdam) and is specialized in international estate and tax planning. He has a specific expertise in emigration of high net worth individuals and the structuring of holding companies, trust and family foundations. He lectures financial and estate planning at HUBrussels and at the Postgraduate in Family Mediation at the University of Leuven. He is also author of several books and contributions on estate and tax planning. He is a.o. member of the editorial staff of the Estate Planning Journal and the Tax Law Journal.

Schedule

The entire schedule leaves ample time for discussions with faculty and fellow participants.

Monday, May 3	Dr Marc-Etienne Pache Fouad Sayegh	**International Taxation Principles and their Application** • key types of taxes to consider when dealing with individual wealth • the five key principles of international taxation (in particular the "double taxation model") • application of principles to wealthy individuals (e.g. multinational income and revenue taxation, treatment of multiple residencies, gifts and inheritance across borders, consequences of residency choice, tax havens)
		Welcoming Dinner
Tuesday, May 4	Dr Kurt Moosmann	**Special Vehicles in Wealth Planning ("The Toolbox")** • private trusts and foundations • private investment companies and funds • insurance products
Wednesday, May 5	Philip Marcovici	**Wealth Planning in a Transparent World** • identifying the needs of wealthy families: tax and non-tax needs and the role respectively limitations of bank secrecy • global transparency and anti-abuse initiatives • the USA as global thought leader: the qualified intermediary, estate tax rules, undisclosed funds • combining the building blocks • developing integrated solutions
	Rupert Ticehurst	**Evening Case Discussion: International Succession Planning**
Thursday, May 6	Rupert Ticehurst	**Wealth Planning in the United Kingdom** • overview of the wealth planning situation in the UK, applications and cases
	Carlo Galli	**Wealth Planning in Italy** • overview of the wealth planning situation in Italy, applications and cases
	Dr Marc Jülicher	**Wealth Planning in Germany** • overview of the wealth planning situation in Germany, applications and cases
Friday, May 7	Prof Anton R. van Zantbeek	**Wealth Planning in Belgium** • overview of the wealth planning situation in Belgium, applications and cases
	Fabricio González	**Wealth Planning in Spain** • overview of the wealth planning situation in Spain, applications and cases
	Line-Alexa Glotin	**Wealth Planning in France** • overview of the wealth planning situation in France, applications and cases

All information contained within this brochure is correct at the time of going to press, but the Swiss Finance Institute reserves the right to make subsequent changes to it, and services may be modified, supplemented, withheld or withdrawn.

Venue
The Seehotel Hermitage in Lucerne, Switzerland, is one of the most delightful lakeside hotels in Switzerland. Far from the hectic pace of daily life, the hotel offers an ideal atmosphere for learning and uninterrupted concentration. The venue offers elegant rooms, state-of-the-art infrastructure, an idyllic setting and superb cuisine. The Hotel is within easy reach of the airports in Zurich and Geneva.
Visit www.hermitage-luzern.ch for more information.

A hotel reservation form will be sent to fully registered attendees.

Registration
To register for the International Wealth and Tax Planning Seminar, please complete the registration form, which can be found on our web site www.SwissFinanceInstitute.ch, and return it by **March 25, 2010.** We recommend that you register in advance of this date to secure your place.

Language
The seminar is conducted in English.

Certificate
The Swiss Finance Institute awards a “Certificate of Attendance” to those who complete the program. Since the International Wealth and Tax Planning Seminar is offered in cooperation with CFA Institute, all CFA Institute members are awarded 36.5 credit hours towards their continuing education requirements.

Fees
The fees are **CHF 6’500.00 (incl. VAT)** which cover tuition, course materials, lunches, official events and refreshments during coffee breaks. Fees do not include hotel expenses. CFA Institute and SFIAA members are granted a reduction of CHF 200.00.

Cancellation Policy
Written cancellations (by letter or fax only) which reach the Swiss Finance Institute by **April 3, 2010** are not subject to any penalty. Cancellations within 30 days prior to the start of the program will be charged 50% of the program fees. Cancellations within 10 days prior to the start will be charged 100% of the fees. Non-payment of tuition does not constitute a cancellation. The substitution of a registered participant may be possible prior to the start of the program.

Contact
Please do not hesitate to contact us for further information. Program Manager Helen Hagenbuch will be glad to assist you.

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Swiss Finance Institute
The Swiss Finance Institute is a private foundation created by the banking and the finance community of Switzerland in collaboration with Swiss universities. The Institute aims to advance research activity in finance and to support doctoral research and executive education in the banking and finance industry, as well as organizing interfacing activities between research and the financial services industry.

For more information visit: www.SwissFinanceInstitute.ch

CFA Institute
CFA Institute is the global, not-for-profit association that administers the Chartered Financial Analyst® (CFA®) and Certificate in Investment Performance Measurement (CIPM) curriculum and exam programs worldwide; publishes research; conducts professional development programs; and sets voluntary, ethics-based professional and performance-reporting standards for the investment industry. CFA Institute has more than 102,000 members, who include the world’s 89,000 CFA charterholders, in 133 countries and territories, as well as 136 affiliated professional societies in 57 countries and territories. CFA Institute has offices in Charlottesville, Va., London, Hong Kong, Brussels, and New York.

More information may be found at www.cfainstitute.org

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