

AGENDA  
TTN Conference New York 2013  
DLA Piper LLP USA



1251 Avenue of the Americas, Telephone number + 1 212 335 4500

**Monday, 6 May 2013**

- 08.30 - 09.00 Welcome with breakfast.
- 09.00 - 09.10 Welcome address by Michael Legamaro, TTN's Treasurer
- 09.10 - 09.35 Investing in US real estate and the Foreign Investment in Real Property Taxes Act (FIRPTA).  
Ian Shane, Golenbock Eiseman LLP, New York, USA, [ishane@golenbock.com](mailto:ishane@golenbock.com)
- 09.35 - 10.00 1031 exchanges.  
Stephen Penn, Penn Proefriedt, New York, USA, [spenn@pennprolaw.com](mailto:spenn@pennprolaw.com)
- 10.00 - 10.25 Embracing Dodd-Frank, Sustainable solutions for US Persons.  
Dominique van Hilten, Highmount Capital LLC, Amsterdam, The Netherlands, [dvanhilten@hmcap.com](mailto:dvanhilten@hmcap.com)  
Moderator: Michael Legamaro, DLA Piper LLP US, Chicago, USA, [michael.legamaro@dlapiper.com](mailto:michael.legamaro@dlapiper.com)
- 10.25 - 10.50 US federal tax consequences resulting from alien individuals obtaining lawful permanent resident (“green card”) status under the US immigration services EB-5 program.  
TTN-member Alan Granwell, DLA Piper LLP US, Washington DC, USA, [alan.granwell@dlapiper.com](mailto:alan.granwell@dlapiper.com)
- 10.50 - 11.10 Coffee and tea break.
- 11.10 - 11.35 OECD report on base erosion and profit shifting and the EU measures against aggressive tax planning and tax fraud.  
Pere Pons, Uría Menéndez, New York, USA, [pere.pons@uria.com](mailto:pere.pons@uria.com)
- 11.35 - 12.00 Switzerland: Recent developments.  
TTN-member Thierry Boitelle, International Law Firm Bonnard Lawson, Geneva, Switzerland, [thierry.boitelle@ilf.ch](mailto:thierry.boitelle@ilf.ch)
- 12.00 - 12.25 When the cloud hits the ground; there’s a tax for that.  
Mark Vanderlinden, Ryan, New York, USA, [mark.vanderlinden@ryan.com](mailto:mark.vanderlinden@ryan.com) ./1

12.25 - 13.30 Lunch break.

13.30 - 13.55 International insurance planning: section 7702 from (a) to (g).

Richard Levine, Withers World Wide, New Haven, USA, richard.levine@withers.us.com

13.55 - 14.45 Tax and succession planning for immigration to the United States.

TTN-member Michael Legamaro, DLA Piper LLP US, Chicago, USA, michael.legamaro@dlapiper.com and  
Warren Whitaker, Day Pitney LLP, New York, USA, gwwhitaker@daypitney.com

14.45 - 15.10 Expatriation for US tax purposes.

Michael Pfeifer, Caplin & Drysdale, Washington, USA, mpfeifer@capdale.com

15.10 - 15.30 Coffee and tea break.

15.30 - 15.55 Recent changes and trends around some offshore and *onshore* jurisdictions.

TTN-member Oscar Guerra, The Corpag Group, Miami, USA, oscar@corpag.com

15.55 - 16.20 Uruguay: Tax update.

TTN-member Eduardo Ferrari, Posada, Posada & Vecino, Uruguay, eferrari@ppv.com.uy

16.20 - 16.45 Transfer Pricing in Brazil – control of interests.

TTN-member Sylvania Tognetti, Xavier Braganca Advogados, Sao Paulo, Brasil, stognetti@xba.com.br

16.45 - 17.10 Using derivatives in inbound tax planning.

Jeffrey Rubinger, Bilzin Sumberg, Miami, USA, jrubinger@bilzin.com

17.10 - 17.35 US estate /gift tax – special case studies.

TTN-member Steven Hagen, Harper Meyer LLP, Miami, USA, shagen@harpermeyer.com

17.35 - 19.00 Cocktail sponsored by:



Conference language: English