

**AGENDA**  
**TTN Conference Sao Paulo 2017**  
**InterContinental Hotel Sao Paulo, Alameda Santos 1123, 01419-001 Sao Paulo**  
**Tel. + 55 11 3179 2600 / Fax + 55 11 3179 2619**



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**Thursday, 30 November 2017**

09.00 - 09.30 Welcome with coffee and tea and breakfast snack.

09.30 - 09.35 Welcome by TTN.

09.35 - 10.00 Exchange of tax-related information and the protection of taxpayer rights.

TTN-member Silvania Tognetti, Tognetti Advocacia, Sao Paulo, Brazil, silvania.tognetti@tognetti.com.br

10.00 - 10.25 New tax return reporting obligation in the USA for LLC's owned by foreign investors (including Brazilians).

TTN-member Daniel R. de Castro, Soldo Consulting, Sao Paulo, Brazil, daniel.castro@taxadvisor.com.br

10.25 - 10.50 Changes in compliance.

Craig Barley, Latour Capital Group, Sao Paulo, Brazil, cbarley@latourcapital.com

10.50 - 11.15 Coffee and tea break.

11.15 - 11.40 Provisory Measure 806 - new rules of private investment funds.

Pedro Custodio, Demarest, Sao Paulo, Brazil, pcustodio@demarest.com.br

11.40 - 12.05 Argentina tax reform: International Implications.

TTN-member Santiago Zebel, The Corpag Group, Buenos Aires, Argentina, santiago@corpag.com

- 12.05 - 12.35 Latest trends in Switzerland and CRS rules - and the confusion coming with it & technical road map PPLI.  
Malcolm Dermit, Swiss Partners, Zürich, Switzerland, malcolm.dermit@swisspartners.com  
Martin Egli, Swiss Partners, Zürich, Switzerland, martin.egli@swisspartners.com
- 12.35 - 14.00 Lunch break.
- 14.00 - 14.25 Vegas is not just for gamblers: The benefits and opportunities of Nevada discretionary trusts for NRA's.  
Datan Dorot, Dorot & Bensimon, Miami, USA, ddorot@dorotbensimon.com
- 14.25 - 14.50 Tax treatment of direct foreign financial invests of Brazilian individuals: a practical approach of the standing rules and tendencies.  
Camillo Sicherle, Sicherle Advogados, Sao Paulo, Brazil, camillo@sicherle.com.br  
Raul Leite, Freitas Leite Advogados, Sao Paulo, Brazil, raul@fladv.com.br
- 14.50 - 15.15 The Bahamas Investment Condominium, a viable restructuring alternative post-amnesty for Brazil.  
Andrew Rolle, Mundo Advisors, Nassau, Bahamas, arolle@mundoadvisors.com
- 15.15 - 15.45 Coffee and tea break.
- 15.45 - 16.10 Uruguay recent changes: New transparency law and regulations regarding beneficial ownership of legal structures.  
Federico Ponce de Leon, The Corpag Group, Montevideo, Uruguay, federico@corpag.com
- 16.10 - 16.35 Trump's impact on immigration policy and procedures.  
TTN-member Luciana Zamith Fischer, Hunter Taubman Fischer & Li, Miami, USA, Lfischer@htlawyers.com
- 16.35 - 17.00 Transnational growth UK/Brazil – an overall view of oportunites at hand.  
Alexandre Caminha, Department for International Trade, Sao Paulo, Brazil, alex.caminha@fco.gov.uk  
Alexandre Assis, Department for International Trade, Sao Paulo, Brazil, alexandre.assis@mobile.trade.gov.uk

17.00 - 17.30 US tax planning for outbound investment in Brazil.  
Jeff Rubinger, Bilzin Sumberg, Miami, USA, jrubinger@bilzin.com

17.45 - 18.45 Cocktails in the View Bar, Alameda Santos, 981 / 30th floor, São Paulo

18.45 End of program.



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