Center for International Legal Studies

In Cooperation with Roger Williams University School of Law

Taxation of Low-Tax and No-Tax Transactions

Kaprun Conference
4 - 10 May 1997
Kaprun, Austria

Schedule

SUNDAY, 4 MAY

Individual arrival.

6 p.m. - Reception, Hotel Steigenberger, Hallenbar.

7 - 10 p.m. - Dinner, Hotel Steigenberger, Riffelkarsaal.

MONDAY, 5 MAY

2 p.m., Hotel Steigenberger, Kitzsteinhornsaal - Greeting - Dennis Campbell, Director, Center for International Legal Studies, Salzburg, Austria. **Introduction** - Joseph Darby, Chairman, Sherburne, Powers & Needham, Boston, Massachusetts, United States.

Session

Moderator: Lothar Hofmann, Anwaltskanzlei Hofmann, Vienna, Austria. **Speakers**: Ernst Walch, Walch & Schurti, Liechtenstein, *Liechtenstein: A Financial and Service Center within the European Economic Area.* Christian Rocca, Isola & Isola, Gibraltar, *Tax Vehicles in Gibraltar.* Michael Alberga, Myers & Alberga, Grand Cayman, Cayman Islands, *Investment in the Cayman Islands.*

3:45 - 4:15 p.m. - Break.

4:15 p.m., Hotel Steigenberger, Kitzsteinhornsaal.

Session II

Moderator: Christian Hoenig, Wolf Theiss & Partners, Vienna, Austria. **Speakers**: Ineke Koele, Van Mens & Wisselink, Utrecht, The Netherlands, *Tax Privileged Status for International Charities.* Silvio Lacayo, Inversiones Básicas S.A., San José, Costa Rica, *Liberalization of the Banking System in Costa Rica.* Denis Berdoz, Baker & McKenzie, Geneva, Switzerland, *Tax Incentives in Switzerland.* George Savvides, George L. Savvides & Co., Limassol, Cyprus, *Tax Advantages in Cyprus.*

7 p.m. - Dinner, Hotel Steigenberger, Riffelkarsaal.

TUESDAY, 6 MAY

2 p.m., Hotel Steigenberger, Kitzsteinhornsaal.

Session III

Moderator: Jerina Malesevic, Law Offices, Zagreb, Croatia. **Speakers**: David Fiske de Gouveia, Madeira Management Companhia Limitada, Funchal, Madeira, *Tax Planning and Use of Madeira as a European Union Base.* Kala Anandarajah, Allen & Gledhill, Singapore, *Is Singapore a Tax Haven?* Jan B. M. Rouppe van der Voort, Citco, Amsterdam, The Netherlands, *The Netherlands and Luxembourg as Gateways to Low-Tax and No-Tax Jurisdictions.*

3:45 p.m. - 4:15 p.m. - Break.

4:15 p.m., Hotel Steigenberger, Kitzsteinhornsaal.

Session IV

Moderator: Deborah Russell, BNA International, London, England **Speakers**: John McNabola, Joy McNabola Murray, Dublin, Ireland, *Ireland and International Tax Planning.* Øystein Sverre, Dege & Co., Oslo, Norway, *Taxation of Norwegian-Controlled Companies in Low-Tax Juris-*

dictions. Juan Albòs, Bufete Mullerat & Roca, Barcelona, Spain, *Spanish Anti-Tax Haven Rules.* Stelios Americanos, George Y. Yiangou & Associates, Nicosia, Cyprus, *Trusts and Shipping Companies in Cyprus*.

7 p.m. - Dinner, Hotel Steigenberger, Riffelkarsaal.

WEDNESDAY, 7 MAY

2 p.m., Hotel Steigenberger, Kitzsteinhornsaal.

Session V

Moderator: Erich Baier, Bilanz-Data, Vienna, Austria. **Speakers**: William Blum, Solomon Pearle Blum & Quinn, New York, New York, United States, *Taxation in the United States Virgin Islands.* Malcom Finney, Nabarro Nathanson, London, England, *Double-Taxation Agreements and Low-Tax Jurisdictions.* Joseph Lurie, Levy Gee, London, England, *The United Kingdom - The Unknown Tax Haven.* Friedrich Schwank, Law Offices of Dr. F. Schwank, Vienna, Austria, *Austria as a Base for International Corporate Tax Planning.*

3:45 p.m. - 4:15 p.m. - Break.

4:15 p.m., Hotel Steigenberger, Kitzsteinhornsaal.

Session VI

Moderator: Alain Steichen, Avocat, Paris, France. **Speakers**: Silvia Zimmermann, Pestalozzi Gmuer & Patry, Zurich, Switzerland, *Privileged Tax Status in Switzerland.* Reinhard Proksch, Intertreuhand AG, Vaduz, Liechtenstein, *Are the Old Tax Havens Disappearing?.* Rosemarie Portner, Oppenhoff & Rädler, Cologne, Germany, *Tax Haven Legislation in Germany.*

7 p.m. - Dinner, Hotel Steigenberger, Riffelkarsaal.

THURSDAY, 8 MAY

2 p.m., Hotel Steigenberger, Kitzsteinhornsaal.

Session VII

Moderator: John Korsø-Jensen, Mazanti-Andersen, Korsø-Jensen & Partners, Copenhagen, Denmark. **Speakers**: Richard Palmer, Ashurst Morris Crisp, London, England, *Anti-Tax Haven Legislation in the United Kingdom.* G. Massimiliano Danusso, Brosio, Casati & Associati, Rome, Italy, *Treatment of Low-Tax Transactions in Italy.* Melvin Warshaw, Burns & Levinson, Boston, Massachusetts, United States, *Inbound Portfolio Investments in the United States.*

3:45 - 4:15 p.m. - Break.

4:15 p.m., Hotel Steigenberger, Kitzsteinhornsaal.

Session VIII

Moderator: P. Neocleous, Andreas Neocelous & Co., Limassol, Cyprus. **Speakers**: René Faltz, Faltz & Associés, Luxembourg, *Transfer of Tax Residence to Luxembourg*. Miguel Teixeira de Abreu, Abreu, Cardigos & Associados, Lisbon, Portugal, *Controlled Foreign Corporations in Portugal*. Tobias Geerling, Pünder, Volhard, Weber & Axster, Berlin, Germany, *Recent Developments in German Taxation of Low-Tax Transactions*. Leonardo Fedrini, Ughi & Nunziante, Milan, Italy, *Italian Debentures and Foreign Entities - New Exemptions.*.

NOTE - Thursday is the last day to register at the reception desk at the Hotel Steigenberger for Saturday transport to the Salzburg Airport and train station.

p.m. - Dinner, Hotel Steigenberger, Riffelkarsaal.

FRIDAY, 9 MAY

2 p.m., Hotel Steigenberger, Kitzsteinhornsaal.

Session IX

Moderator: Joseph Darby, Sherburne, Powers & Needham, Boston, Massachusetts, United States. **Speakers**: Nico L. Buren, Maaldrink Buren, The Hague, The Netherlands, *Tax Regime for Dutch Finance Centers and Changes in the Participation Exemption*. Francois Stevenart Meeus, Derks Star Busmann Hanotiau, Brussels, Belgium, *Tax Treatment of Share Transfers in Belgium*. Kristoffel Vermeersch, Marx Van Ranst Vermeersch, Brussels, Belgium, *Taxation of Belgian Coordination, Distribution and Service Centers*.

3:45 p.m. - 4:15 p.m. - Break.

4:15 p.m., Hotel Steigenberger, Kitzsteinhornsaal.

Session X

Moderator: David Dadge, Center for International Legal Studies, Salzburg, Austria. **Speakers:** Melvin Warshaw, Burns & Levinson, Boston, Massachusetts, United States, *United States Taxation of International Computer Software and Internet Transactions*. Etienne Spierts, Loyens & Volkmaars, Frankfurt/Main, Germany, *Acquisition Holdings in The Netherlands*.

7 p.m. - Concluding dinner.

SATURDAY, 10 MAY

Individual departure. There will be two coaches from Kaprun to Salzburg Airport and train station, one early in the morning and one later, as per advance registration.