VENUE
Mandarin Oriental, 500 Brickell Key Dr, Miami, FL 33131
Tel: (305) 913-8288 | Website: http://www.mandarinoriental.com/miami/

REGISTRATION
Registration for the Workshops and Conference is available at the following website: https://www.americanbar.org/groups/taxation/events_cle/19latin_resources. All individuals attending any part of the Workshops and Conference must register and pay the registration fee. Shared registrations are not permitted. Payment may be by check, credit card, or wire transfer. Checks should be made payable to the American Bar Association. To request bank wire details, or if you have a question about registration, please contact taxmeeting@americanbar.org.

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<th>Registration Categories</th>
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<tr>
<td>ABA, IFA, IBA, or Past Conference Attendee</td>
<td>$795</td>
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<tr>
<td>Non-Member</td>
<td>$895</td>
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<tr>
<td>Young Lawyer (under 35 years)</td>
<td>$595</td>
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<tr>
<td>Government/In-House Counsel/Academic/First-Time Attendee</td>
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<tr>
<td>Wealth Management Workshop Only</td>
<td>$225</td>
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<tr>
<td>Full-Time Law Student</td>
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CONFERENCE DESCRIPTION
The Conference, now in its twelfth year, will address key tax issues for a wide range of in-house and outside tax and finance personnel doing business in the U.S. and Latin America. Case studies will underscore the effect of treaties, court decisions and domestic laws to provide insight into local planning opportunities. Panels will feature industry speakers, leading practitioners and government representatives offering the latest perspectives from the U.S. and Latin America on such topics as the impact of U.S. Tax Reform on U.S. multinational investment in Latin America and Latin America investment in the U.S., cross-border M&A, taxation of digital services, tax controversy and litigation, cryptocurrency and blockchain, the effect of new European CFC rules, the interpretation, application and potential pitfalls of the MLI, the changing relationship between taxpayers and tax authorities, and more.

As in past years, the Conference will be supplemented by half-day Wealth Management and Tax Executives Workshops on Wednesday, June 12. Numerous networking opportunities will be provided and a reception and dinner will be held on Thursday evening.
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<td>12:45 p.m. – 1:00 p.m.</td>
<td>Wealth Management Workshop Opening Remarks</td>
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<td>Advising HNWIs in a New Era of Taxation: Suitable Holding Company Regimes, Opportunities and Traps Behind the Non-Resident/Non-Domiciled Income Tax Regimes for Individuals, and Alternatives to Reorganize</td>
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<td>9:00 a.m. –</td>
<td>The Taxation of Digital Services: A World of Change</td>
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<td>9:00 a.m. –</td>
<td>“Hidden Wealth”: The Global Campaign for Tax Transparency – the Latin Response</td>
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<td>Impact of U.S. Tax Reform on U.S. Companies Investing in Latin America: What</td>
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WEALTH MANAGEMENT WORKSHOP
12:00 p.m. – 12:45 p.m.
Registration of Delegates

12:45 p.m. – 1:00 p.m.
Opening Remarks

1:00 p.m. – 3:00 p.m.
Advising HNWIs in a New Era of Taxation: Suitable Holding Company Regimes, Opportunities and Traps Behind the Non-Resident/Non-Domiciled Income Tax Regimes for Individuals, and Alternatives to Reorganize

The panelists will compare alternative holding company regimes from the perspective of the different jurisdictions (participation exemption, free distribution of dividends, territorial regimes, treaty network, wealth tax and inheritance tax, by laws and shareholder agreements).

The panel will analyze the advantages offered by the non-resident/non-domiciled income tax regimes: main requirements, impact on business structures, reporting, etc. vis-à-vis the impact under CFC/PFIC rules, territorial regimes, low tax jurisdictions, etc.

Co-Chairs
Iñigo Aguirrezabala, Cuatrecasas, Barcelona, Spain
Seth Entin, Holland & Knight LLP, Miami, FL, USA

Speakers
Juan Camilo De Bedout, Posse Herrera Ruiz, Bogotá, Colombia
Flavia Allegro Gerola, Trench Rossi Watanabe, São Paulo, Brazil
Richard Giangrande, Macfarlanes LLP, London, England
Ronald Nobrega, Fasken Martineau DuMoulin LLP, Toronto, ON, Canada
Pedro Ramirez Mota Velasco, Turanzas, Bravo & Ambrosi, S.C., Mexico City, Mexico

3:00 p.m. – 3:30 p.m.
Networking Break
3:30 p.m. – 5:30 p.m.

Roundtable Discussion Session

In an interactive and dynamic format, participants will be able to rotate through four separate tables, each with their own topic, and participate in discussions led by industry leaders to address pressing and relevant issues affecting clients, including the following:

- Relocation Strategies: How to Enter and How to Exit
- Trusts, Foundations and Other Fiduciary Arrangements: Who Faces the Tax Burden?
- Marital Shares and Pre-Nuptial Arrangements: When Do They Fail?
- The Evolution of Tax Transparency Including CRS and Public Registries: Where Do We Stand?

Panel Co-Chairs
Rodrigo Castillo, Baker McKenzie, Bogotá, Colombia
Kathryn von Matthiessen, Katten Muchin Rosenman LLP, New York, NY, USA

Relocation Strategies Table Co-Chairs
Percy Castle, Casa Hierro Abogados, Lima, Perú
Erika Litvak, Greenberg Traurig PA, Miami, FL, USA

Trusts Table Co-Chairs
Javier Canosa, Canosa Abogados, Buenos Aires, Argentina
Shelly Meerovitch, Bernstein Global Wealth Management, New York, NY, USA

Marital Shares Table Co-Chairs
Camilo Cortés, Dentons Cardenas & Cardenas, Bogotá, Colombia
Rosie Schumm, Forsters LLP, London, England

Transparency Table Co-Chairs
Cecilia (Ceci) Hassan, Baker McKenzie, Miami, FL, USA
Roberto Padilla Ordaz, Chevez, Ruiz, Zamarripa y Cia., S.C., Mexico City, Mexico
TAX EXECUTIVES WORKSHOP
12:00 p.m. – 12:45 p.m.
Registration of Delegates

12:45 p.m. – 1:00 p.m.
Opening Remarks

1:00 p.m. – 2:15 p.m.
Electronic Tax Compliance in Latin America: Processes and Systems from a BEPS/CbC Perspective

This panel will cover the main challenges for companies in Latin America in establishing and managing electronic tax compliance, audits and litigation in the region. It is known that Latin America has significantly more complex compliance and court systems than other regions. Companies need to be prepared to operate in such a sophisticated, electronic and adversarial environment. The speakers will cover what the best systems and controls for Latin America are and how to create and maintain processes that are compliant from local perspectives from compliance, through inspections.

Chair
Lionel Nobre, Dell Computadores do Brasil Ltda., Rio Grande do Sul, Brazil

Speakers
Maria Fernanda Campos, Ford Motor Company, São Paulo, Brazil
Ivan Ferreira, Siemens, São Paulo, Brazil
Carlos Rivero, Mercado Libre, Buenos Aires, Argentina

2:15 p.m. – 2:45 p.m.
Networking Break
2:45 p.m. – 4:00 p.m.
Managing an In-House Tax Department in Latin America and Adding Value in Tough Times

This panel will address the best practices for managing in-house tax talent in Latin America, including the skill set required and demands of the in-house tax job in Latin America in times of an economic crisis.

The panel will also address how to efficiently communicate Latin America tax issues to headquarters and add value in tough times. This includes best communication techniques & strategies and how to support and enable businesses in the more than 21 different jurisdictions in the region. Speakers will share cases on their management style, communication and work that have made a difference to their companies and added to the bottom line.

Chair
Lionel Nobre, Dell Computadores do Brasil Ltda., Rio Grande do Sul, Brazil

Speakers
Alejandro Ramallo, DHL Latin America, Buenos Aires, Argentina
Stuart Chessman, Vivendi S.A., New York, NY, USA
Rafael Toribio Nunes, Sanofi, São Paulo, Brazil

4:00 p.m. – 5:15 p.m.
Electronic Tax Audits and Litigation in Latin America: The In-House Perspective

How to best manage a tax dispute in an electronic environment, from the collection and use of data, answering IDRs, the audit/inspection through the assessment and judicial disputes including the managing external tax counsel/consultants. The panel will share how they plan and manage and audit as well as choose and work their external tax counsel. What are the best strategies to avoid and manage an audit? When to litigate or not?

Chair
Lionel Nobre, Dell Computadores do Brasil Ltda., Rio Grande do Sul, Brazil

Speakers
Roberto Alvarez Lopez, Grupo Posadas, Mexico City, Mexico
Florencia Lucila Misrahi, Cargill S.A.C.I., Buenos Aires, Argentina
Juan Pablo Wills, Uber, Bogotá, Colombia
TAX PRACTICE TRENDS CONFERENCE — DAY 1  
8:00 a.m. – 5:30 p.m.
Registration of Delegates

8:00 a.m. – 8:50 a.m.
Continental Breakfast

8:50 a.m. – 9:00 a.m.
Opening Remarks

9:00 a.m. – 10:30 a.m.  Concurrent Session A
The Taxation of Digital Services: A World of Change

Latin America, Europe and North America all face a revolution in tax law triggered by the explosive growth of the digital economy. Individual jurisdictions have adopted new legal measures on a national and subnational level. In parallel to these actions, the OECD has launched a broad process of discussion in an attempt to find a global framework. This panel will examine the digital economy as it affects Latin America, will review what changes in tax law have been implemented so far and what legislation and solutions are now under consideration for the future. Both direct and indirect taxation will be addressed.

Co-Chairs
Stuart Chessman, Vivendi, New York, NY, USA
Guillermo Teijeiro, Teijeiro & Ballone, Buenos Aires, Argentina

Speakers
Julio Castro, KPMG LLP, London, England
Agnès de l’Estoile Campi, CMS Francis Lefebvre Avocats, Paris, France
Rosario Huet, Ramírez, Gutiérrez-Aztepe, Rodríguez-Rivero y Hurtado S.C., Mexico City, Mexico
Juan David Velasco, Posse Herrera Ruiz, Bogotá, Colombia
Juan Pablo Wills, Uber, Bogotá, Colombia
9:00 a.m. – 10:30 a.m. Concurrent Session B
“Hidden Wealth”: The Global Campaign for Tax Transparency – the Latin Response

Tax evasion, particularly by ultra-high net worth individuals, is flourishing. One commentator estimates that 8% of the global financial wealth of households is held in tax havens, about $7.6 trillion at the end of 2013. In response, a number of governments, tax authorities, and supranational organizations have initiated a variety of efforts to uncover these hidden financial assets.

The panel session would include, inter alia, a discussion of recent Latin American developments with regard to:

- The Common Reporting System (CRS)
- Golden Passports
- Economic Substance Requirements for Shell Companies
- Beneficial Ownership Disclosure
- Tax Haven Black Lists
- OECD Global Forum on Tax Transparency

Co-Chairs
Leonard Schneidman, Andersen Tax LLC, Boston, MA, USA
Alejandro Torres, Chevez, Ruiz, Zamarripa y Cia., S.C., Mexico City, Mexico

Speakers
Alberto Benshimol, D’Empaire Reyna Abogados, Caracas, Venezuela
Renata Emery, Stocche Forbes Advogados, Rio de Janeiro, Brazil
Kat Saunders Gregor, Ropes & Gray LLP, Boston, MA, USA
Javier Robalino, FERRERE, Quito, Ecuador
Cristian E. Rosso Alba, Rosso Alba, Francia & Asociados Abogados, Buenos Aires, Argentina

10:30 a.m. – 11:00 a.m.
Networking Coffee Break

The U.S. tax reform legislation affects the way in which U.S. companies structure their operations in Latin America. Our panel will discuss the latest challenges that U.S. companies and their subsidiaries are facing in Latin America as a result of the 2017 Tax Act. The panel will also discuss potential tax policy and regulatory changes in the U.S. and Latin America that companies should be aware of.

Co-Chairs
Fernando Camarena, Foley Gardere Arena, Mexico City, Mexico
Jorge E. Castro, Miller & Chevalier Chartered, Washington, DC, USA

Speakers
Isabel Espinoza, Baraona Fischer & Cia., Santiago, Chile
Gustavo Lazo, Rodrigo, Elías & Medrano Abogados, Lima, Perú
Ana Luiza Martins, Mayer Brown, São Paulo, Brazil
Florencia Lucila Misrahi, Cargill S.A.C.I., Buenos Aires, Argentina

The Multilateral Instrument (MLI), Interpretation, Application and Potential Pitfalls

The MLI entered into force on 1 July, 2018 and its provisions became effective on 1 January, 2019 for the first tax treaties concluded among the participating jurisdictions. Therefore, the BEPS tax treaty related measures are now a reality.

After providing an update on the current status of the MLI, including the new guidance on the Synthesized texts, the panel will focus on the practical implications for cross-border corporate structures deriving from the MLI anti-treaty abuse provisions.

The complexity of the application of the MLI provisions coupled with the proliferation of unilateral domestic anti-avoidance measures may render the application of tax treaties more and more difficult going forward. In particular, the panel will discuss - also with reference to concrete examples – the possible impact of these new provisions and their interaction with general anti-avoidance rules, and other legal and policy developments. In addition to BEPS, new OECD initiatives starting from the taxation of activities derived from digital services rendered abroad and indirect taxation on digital services raise the question of whether the balance in treaties regarding source and residence taxation now settled for a century is changing.
Co-Chairs
Roberto Duque Estrada, Brigagão Duque-Estrada, Rio de Janeiro, Brazil
Prof. Fred Murray, University of Florida Levin College of Law, Gainesville, FL, USA

Speakers
Delcia Capocasale, Cuatrecasas, New York, NY, USA
Sylvia Dikmans, Houthoff Buruma, Amsterdam, The Netherlands
Daniela Rey, Bruchou, Fernández Madero & Lombardi, Buenos Aires, Argentina
Jeffrey L. Rubinger, Bilzin Sumberg, Miami, FL, USA

12:30 p.m. – 2:00 p.m.
Keynote Luncheon
Speaker
Prof. Reuven S. Avi-Yonah, Director, International Tax LLM Program, University of Michigan Law School, Ann Arbor, MI, USA

2:00 p.m. – 3:30 p.m. Concurrent Session A
Impact of U.S. Tax Reform on Latin American Investment in the United States

The recent U.S. tax reform significantly tilted the tax rate differential, among other changes, to favor greater investment into the United States. This session will review the U.S. tax reform and recent regulations issued by the Treasury Department in combination with the tax framework of various jurisdictions in Latin America and changes in the tax legislation adopted by those jurisdictions in light of the US tax reform with a focus on the structuring of Latin American investments into the United States, and trends in the region.

Co-Chairs
Eduardo Cukier, Curtis, Mallet-Prevost, Colt & Mosle LLP, New York, NY, USA
Fernando Tonanni, Machado Meyer, São Paulo, Brazil

Speakers
Jason S. Bazar, Mayer Brown, New York, NY, USA
Mariana Eguiarte, Sánchez DeVanny Eseverri, S.C., Mexico City, Mexico
Andrés González, DLA Piper Martinez Beltran, Bogotá, Colombia
Corina Laudato, Mitrani Caballero & Ruiz Moreno, Buenos Aires, Argentina
Rocio Liu, Miranda & Amado Abogados, Lima, Perú
2:00 p.m. – 3:30 p.m.  Concurrent Session B
Hybrid Instruments/ATAD/Anti-Hybrid Rules

This panel will cover recent legislative and judicial efforts to combat hybrid entities and instruments that have prevailed in international tax planning. The panel will cover situations where new rules may cause multiple taxation and taxpayer defensive planning to ameliorate the adverse effect of these new rules, with a focus on Latin America.

Co-Chairs
Mario Gorziglia, Prieto Abogados, Santiago, Chile
Sam Kaywood, Alston & Bird, Atlanta, GA, USA

Speakers
Maximiliano Batista, Martinez de Hoz & Rueda, Buenos Aires, Argentina
Pere Pons, Chevez, Ruiz, Zamarripa y Cia., S.C., New York, NY, USA
Rafael Moll de Alba, Charles Russell Speechlys, Luxembourg, Luxembourg
Ramon Tomazela, Mariz de Oliveira e Siqueira Campos Advogados, São Paulo, Brazil
Carolina Rozo, Philippi Prietocarrizosa Ferrero DU & Uría, Bogotá, Colombia
Guilherme Viegas Di Ricco, AES Corporation, Panama City, Panama

3:30 p.m. – 4:00 p.m.
Networking Coffee Break

4:00 p.m. – 5:30 p.m.  Concurrent Session A
The Changing Landscape in Laws Across Jurisdictions and its Implications for Tax Controversy and Litigation

This panel will address key new provisions in Latin American countries, including retroactive provisions, issues in United States statutes and regulations, and the impact of these changes on the controversy landscape with specific examples.

Co-Chairs
Kevin Otero, Covington & Burling LLP, New York, NY, USA
Jessica Power, Carey y Cia., Santiago, Chile

Speakers
Felipe Aroca, Aroca Vives, Barranquilla, Colombia
Maria Fernanda Campos, Ford Motor Company, São Paulo, Brazil
Jorge Lopes Jr., Pinheiro Neto, São Paulo, Brazil
Marcelo Núñez, Perez Alati, Grondona, Benites & Arntsen, Buenos Aires, Argentina
Nathalie Rodríguez Paris, LEGA Abogados, Caracas, Venezuela
4:00 p.m. – 5:30 p.m. Concurrent Session B
Cryptocurrency and Blockchain: An Introduction to the New Frontier

This panel will discuss the taxation of transactions involving cryptocurrency while also introducing new advances in blockchain technology that may forever change the way that Latin American tax authorities will be able to track future domestic and cross-border transaction. The panel will initially introduce many of the important concepts associated with cryptocurrency and blockchain, such as “forks,” “mining,” “airdrops” and “ICOs.” Thereafter, the panel will present various examples of domestic and cross-border cryptocurrency/blockchain transactions while describing the tax consequences of those transactions in each of the represented countries.

Co-Chairs
Juan Carlos Garantón, Torres Plaz & Araujo, Caracas, Venezuela
Richard Winston, Winston Legal Group LLC, Miami, FL, USA

Speakers
Erika Bonner, KPMG LLP, San Francisco, CA, USA
Eduardo Brandt López, Creel, García-Cuéllar, Aiza y Enríquez, Mexico City, Mexico
Ricardo Mihura Estrada, Leverone & Mihura Estrada, Buenos Aires, Argentina
Elizabeth Paya, Cariola, Díez, Pérez-Cotapos Abogados, Santiago, Chile

6:00 p.m. – 7:00 p.m. Mandarin Oriental Beach
Networking Cocktail Reception (inclement weather location: Salon 1)

7:00 p.m. – 9:00 p.m. The Wine Room at the Mandarin
Networking Dinner
TAX PRACTICE TRENDS CONFERENCE — DAY 2
8:00 a.m. – 3:30 p.m.
Registration of Delegates

8:00 a.m. – 9:00 a.m.
Continental Breakfast

9:00 a.m. – 10:30 a.m. Concurrent Session A
Digital Economy Roundtable Discussion

The digital economy presents many challenges for the tax adviser. Are the new digital economy business models simply expansions of “old economy” business models (for instance, the move from catalog shopping to online shopping) or are they something new entirely? This session will have multiple round-tables discussing different “digital economy” business models, considering how taxing authorities in different jurisdictions are analyzing the issue and the extent to which they are transforming their tax systems to address these different business models.

Co-Chairs
Ana Lucía Ferreyra, Pluspetrol, Montevideo, Uruguay
David Shapiro, Saul Ewing, Philadelphia, PA, USA

Table Co-Chairs
Paul D. Carman, Chapman and Cutler LLP, Chicago, IL, USA
Victor A. Jaramillo, Caplin & Drysdale, Washington, DC, USA
Diego Salto van der Laat, Consortium Legal, San José, Costa Rica
Erika Yumi, Chiarottino & Nicoletti, São Paulo, Brazil

Speakers
Valeria D’Alessandro, Goldemberg Saladino, Hermida Rolando & Asociados, Buenos Aires, Argentina
Catalina Jaramillo Hernández, Brigard & Urrutia, Bogotá, Colombia
Carlos Eduardo Orsolon, Demarest, São Paulo, Brazil
Javier Otegui, Guyer & Regules, Montevideo, Uruguay
Arturo Tiburcio, Hogan Lovells, Mexico City, Mexico
Fernando M. Vaquero, Marval O’Farrell & Mairal, Buenos Aires, Argentina
David Warthon, EY, Lima, Perú
Juan Pablo Willis, Uber, Bogotá, Colombia
9:00 a.m. – 10:30 a.m.  Concurrent Session B
**The Impact of Tax Reform in Selected Latin American Jurisdictions on International Transactions**

The 2018 year was one of political and economic turmoil and change in most economies in Latin America. With new governments has come tax reform which continues the ongoing process of strengthening and modernizing many of the Latin American domestic tax regimes. While only two countries - Chile and Mexico - are members of the OECD, numerous other Latin American countries have joined the Inclusive Framework and are currently active participants in the discussions relating to actions included the BEPS project. Tax reforms in some of these countries are fundamentally based on or in response to the BEPS initiatives; while other jurisdictions have clearly indicated a preference to focus on tax changes to support their specific political or socio-economic agendas. The panel will discuss some of the more substantial reforms in selected Latin American jurisdictions and examine how these changes will affect foreign multinationals and international business transaction with some connection to those jurisdictions.

**Co-Chairs**
Maria Carolina Cano González, AraqueReyna, Caracas, Venezuela
Elinore Richardson, EMKDM Global Consultants Inc., Toronto, ON, Canada

**Speakers**
Fabian Birnbaum, Innovation Tax & Trust, Montevideo, Uruguay
Francisca Fernández, Guerrero Valle Garcés Abogados, Santiago, Chile
Wayne Fields, DGM Financial Group, St. Michael, Barbados
Marco Monteiro, Veirano Advogados, São Paulo, Brazil
Maria de los Angeles Olano, Beccar Varela, Buenos Aires, Argentina
Jorge Otoya Cabrera, Estudio Muñiz, Ramirez, Perez-Taiman & Olaya Abogados, Lima, Perú

10:30 a.m. – 11:00 a.m.
**Networking Coffee Break**
11:00 a.m. – 12:30 p.m.  Concurrent Session A  
Exploring the Complex Relationship Between Taxpayers and Tax Authorities

This panel of government personnel and private practitioners will explore in some detail the complex relationships between and among tax authoritites and taxpayers across a selected landscape of jurisdictions. Topics discussed will include so-called “revolving door” issues, interactions on published guidance (comments etc), tax controversies both administrative and litigation, relationships relating to private guidance (private letter rulings etc.) and dealing with foreign audits and competent authority.

Co-Chairs
Hal Hicks, Skadden, Arps, Slate, Meagher & Flom LLP, Washington, DC, USA  
Luis Ortiz-Hidalgo, Ortiz, Hernandez y Orendain, S.C., Mexico City, Mexico

Speakers
Fernando Hampshire, Tax Administration Service, Mexico City, Mexico  
Raquel Novais, Machado Meyer Sendacz & Opice Advogados, São Paulo, Brazil  
Phelippe Oliveira, Office of the Attorney General for the National Treasure, São Paulo, Brazil  
Bob Stack, Deloitte Tax LLP, Washington, DC, USA

11:00 a.m. – 12:30 p.m.  Concurrent Session B  
The Effect of New European CFC Rules on Latin America and the United States

Description coming soon.

Co-Chairs
Lori Hellkamp, Jones Day, Washington, DC, USA  
Pablo Ordoñez, FERRERE, Santa Cruz, Bolivia

Speakers
Charlotte Kiès, Loyens & Loeff, Amsterdam, The Netherlands  
Ana Paula Pardo, SMPS Legal, Mexico City, Mexico  
William B. Sherman, Holland & Knight, Miami, FL, USA  
Ana Claudia Utumi, Utumi Advogados, São Paolo, Brazil  
Sonia Velasco, Cuatrecasas, Barcelona, Spain
12:30 p.m. – 2:00 p.m.
**Networking Luncheon**

2:00 p.m. – 3:30 p.m.  Concurrent Session A
**Executive Compensation: Stock Options/Phantom Shares/Use of Insurance Products**
*Description coming soon.*

**Co-Chairs**
Henrique Lopes, Koury Lopes Advogados, São Paulo, Brazil
*Additional co-chair to be announced.*

**Speakers**
Ariadna L. Artopoulos, M & M Bomchil, Buenos Aires, Argentina
José Chiarella, Damma Legal Advisors, Lima, Perú
Maria Teresa Cremaschi, Barros y Errazuriz Abogados, Santiago, Chile

2:00 p.m. – 3:30 p.m.  Concurrent Session B
**A Time of Change – The Current State of Mergers and Acquisitions in Latin America**

This panel will explore the contours and changes of evaluating and executing mergers and acquisitions from a tax perspective throughout Latin America and from Latin America into the US. This panel will provide a particular emphasis on practical approaches to the most vexing issues presented by the uncertainties of tax law in the region including debt push down, asset basis step up as well as pre- and post-transaction restructuring.

**Co-Chairs**
Devon Bodoh, Weil, Gotshal & Manges LLP, Washington, DC, USA
Leandro M. Passarella, Passarella Abogados, Buenos Aires, Argentina

**Speakers**
Mauricio Bravo, Turanzas, Bravo & Ambrosi, Mexico City, Mexico
Luiz Felipe Centeno Ferraz, Mattos Filho, São Paulo, Brazil
Manuel José Garcés, Carey y Cia., Santiago, Chile
Carmen Sanabria, Dentons Cardenas & Cardenas, Bogotá, Colombia
Jay M. Singer, McDermott Will and Emery LLP, Washington, DC, USA
Luis Suárez de Centi, Uría Menéndez, New York, NY, USA

3:30 p.m.
**Conference Closes**
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www.americanbar.org/groups/taxation

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IFA – USA Branch
www.ifausa.org

Formed in 1938, the International Fiscal Association is a leading non-governmental, international organization dealing with tax matters. The USA Branch is the largest national IFA branch, with approximately 1,000 members. The Branch hosts a two-day conference in late February/early March of each year with presentations by eminent international tax experts on topics, planning ideas and issues of current importance. The USA Branch also holds joint meetings each year with branches from other countries.

International Bar Association, Taxes Committee
www.ibanet.org

The International Bar Association (IBA) is the world’s leading organization of international legal practitioners, bar associations and law societies. The IBA influences the development of international law reform and shapes the future of the legal profession throughout the world. It has a membership of over 45,000 individual lawyers and 200 bar associations and law societies spanning all continents. It has considerable expertise in providing assistance to the global legal community as well as being a source of distinguished legal commentators for international news outlets.

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www.tei.org

Tax Executives Institute, founded in 1944, is the preeminent association of corporate tax professionals worldwide. Its 7,000 members are accountants, lawyers, and other corporate and business employees who are responsible for the tax affairs of 3,000 of the leading companies in North America, Europe, and Asia. Through educational forums, liaison meetings with government officials, testimony at public hearings, and written submissions, TEI supports the development and effective implementation of sound tax policy, promotes the uniform and equitable enforcement of the tax laws, and works to reduce the cost and burden of administration and compliance to the benefit of taxpayers and government alike.

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