A conference presented by the IBA Private Client Tax Committee and supported by the IBA Family Law Committee

29th Annual International Private Client Tax Conference
Navigating the private client world in turbulent times

3–5 March 2024, Raffles London at the OWO, London, England

TOPICS INCLUDE:

- AI: is it game over for humans?
- Oh my GAAR! Have general tax anti-avoidance rules changed the way we approach tax planning?
- Stiff Winds, New Currents and Rough Seas – Roundtable discussion on hot topics, changes and matters that will stay forever.
- You can run but you can’t hide: a forum shopper’s guide to different matrimonial jurisdictions.
- Roundtable session: a game of snakes and ladders – the search for the perfect jurisdiction.
- Will they rest in peace: navigating the complex world of estate tax treaties.
- Is it possible to bulletproof your trust/foundation structure?
- Should I stay or should I go? Issues related to changing tax residency.
- Make it rain – advising Zennials.

HEADLINE CONFERENCE SPONSOR

CAF
Charities Aid Foundation

For more information and to book online visit www.ibanet.org/conference-details/CONF2341

REGISTER BEFORE 19 JANUARY TO RECEIVE EARLY REGISTRATION DISCOUNTS
Programme

Conference Co-Chairs
Anne Guichard N3T Notaires, Paris; Co-Chair, IBA Private Client Tax Committee
Gerd D Goyvaerts Tiberghien, Antwerp; Vice-Chair, IBA Private Client Tax Committee
Mark E Osborne Osborne Helman Scott Knisely & Stanton, Austin, Texas; Co-Chair, IBA Private Client Tax Committee

Sunday 3 March

1800 – 1930 Hosted welcome reception
Phillips Auction House
30 Berkeley Square, Mayfair, London W1J 6EX
Conference reception kindly provided by Phillips Auction House.

Monday 4 March

0845 – 0900 Introduction from the Conference Co-Chairs

0900 – 1015
AI: is it game over for humans?
There is hardly a private client advisor who has not heard of ChatGPT and similar large language models. While these are just fancy statistical next-word predictors, the texts generated by them are of an astounding human-like quality. In this session you will learn who the main players are in this field, what tools you as an advisor should be looking into, what their limitations are, and how these models will likely develop in the next few years. Brace yourself for the future, by attending the session – which will be both exciting and frightening!

Session Chair
Niklas Schmidt Wolf Theiss, Vienna; Member, IBA Private Client Tax Committee Advisory Board

Speakers
Gary Ashford Harbottle & Lewis, London
Michael Fischer Fischer Ramp Buchmann, Zurich
Andrea Gallizioti Scanioni Angelucci, Milan

1015 – 1100 Keynote address
Rear Admiral Chris Parry Portsmouth

1100 – 1130 Coffee/tea break

1130 – 1245
Oh my GAAR! Have general tax anti-avoidance rules changed the way we approach tax planning?
In this panel we review how different countries approach tax anti-avoidance, whether through targeted measures or general anti-avoidance rules. We will discuss whether GAARs tend to achieve their stated purpose of stamping out unacceptable tax avoidance practices, and whether they ever go too far in preventing legitimate planning.

Session Chair
Sangna Chauhan Charles Russell Speechly, London; Scholarship Officer, IBA Private Client Tax Committee

Speakers
Ron Choudhury Miller Thomson, Toronto, Ontario
Seth Entin Greenberg Traurig, Miami, Florida
Michael Khayat Arkwood, Paris
Shreya Rao Shreya Rao & Associates Bangalore, Karnataka
Sonia Velasco Cuatrecasas, Barcelona

1245 – 1400 Lunch

Headline social event sponsors

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HEUKING

This reception, which will welcome all delegates to the Conference, will also be an opportunity to view some of their current works.

All registered delegates are welcome to attend.
1400 – 1515

**Roundtable: stiff winds, new currents and rough seas – our popular roundtable discussion on hot topics, changes and matters that will stay forever**

- What are the most recent changes in law in your country?
- What are the boiling hot topics in your jurisdiction?
- How are you using artificial intelligence in your daily practice?
- Have you encountered issues with office management, career planning, and talent retention?

Join us for a lively round-table discussion for an exchange of knowledge among participants. The facilitators will open the debate and then the floor is yours!

**Moderator**
Markus Zwicky  
Zwicky and Partners, Zug; Membership Officer, IBA Private Client Tax Committee

**Facilitators**

Percy Castle  
DS Casahierro, Lima

Tendon Dahortsang  
Fischer Ramp Buchmann, Zürich

Romain Desmonts  
McDermott Will & Emery, Paris

Thomas Fritz  
Bellecapital, Zürich

Aidan Grant  
Collyer Bristow, London

Sandra Gulich-Merrad  
Blum Grob, Zürich

Steve J Hare  
Ytterberg Deery Knoll, Austin, Texas

Jake Kaplan  
Alston & Bird, Atlanta, Georgia

Jochen Kotzenberg  
Flick Gocke Schaumburg, Bonn

Max Kremer  
Arendt, Luxembourg

Rachel Mainwaring-Taylor  
Rawworths, Harrogate; Treasurer, IBA Private Client Tax Committee

Stella Strati  
Patrikios Pavlou Associates, Limas

Carine Tohme  
Tohme Law Firm, Beirut

Rashad Wareh  
Kozusco Harris Duncan, New York

1545 – 1700

**You can run, but you can’t hide**

A forum shopper’s guide to different matrimonial jurisdictions: which are friendly, and which should have them quickly lacing up their running shoes. Please join this panel of esteemed speakers from the realms of family law and private client tax, for what promises to be a lively and controversial session.

**Session Co-Chairs**

Tom Amlot  
Alexiou Fisher Philipps, London; Treasurer, IBA Family Law Committee

Catherine Watson-Coles  
McInnes Cooper, Halifax, Nova Scotia; Member, IBA Private Client Tax Committee Advisory Board

**Speakers**

Delphine Eskenazi  
Libra Avocats, Paris

Amy Radnor  
Farrer, London

Kinga Weiss  
Walder Wyss, Zurich

1900  
Conference reception and dinner

One Whitehall
1 Whitehall Place, London, SW1A 2HE

Price: £125

One place per registered delegate is permitted.

Transport is not provided.
Tuesday 5 March

0800 – 0900

**Breakfast roundtables: a game of snakes and ladders – the search for the perfect jurisdiction**

Come prepared to share your advice about the pros and cons of your jurisdiction, in small groups, over breakfast. Does your jurisdiction have the best weather, the best wine and the best tax regime? Have you top tips for pre-immigration planning? Are there bear traps to avoid?

**Moderator**
Daniel Simon  Collyer Bristow, London; Member, IBA Private Client Tax Committee Advisory Board

**Facilitators**
Alessia Allegretti  Boies Schiller Flexner, Milan
Jack Bernstein  Aird and Berlis, Toronto, Ontario
Marco Cerrato  Maisto E Associati, Milan
Joao Coriel  Valadas Coriel E Associados, Lisbon
Rebecca Diacono  Fenech & Fenech Advocates, Valetta
Darrell King  Crestbridge Fiduciary, New York
Dirk-Jan Maasland  Loyens & Loeff, Amsterdam
Natalie Peters  Blum & Grob, Zürich
Shawntel Randi  Nixon Peabody, Boston, Massachusetts
Autumn Ronda  Mitchell Silberberg & Knupp, Los Angeles, California
Stefan Stellato  Hannes Snellman, Helsinki
Pleuni Visser  Loyens & Loeff NV, Amsterdam

0900 – 0915 **Welcome from the Conference Co-Chairs**

0915 – 1030

**Will they rest in peace: navigating the complex world of estate tax treaties**

A stimulating discussion among expert private client attorneys about the effective use of estate tax treaties to mitigate the client’s potential exposure to estate/inheritance tax across jurisdictions.

**Session Chair**
Eric Dorsch  Koizusko Harris Duncan, New York; Website Officer, IBA Private Client Tax Committee

**Speakers**
Bijal Ajinkya  Khaitan & Co, Mumbai, Maharashtra; Scholarship Officer, IBA Private Client Tax Committee
Clare Archer  Pennington Manches, London; Committee Liaison Officer, IBA Private Client Tax Committee
Nicola Saccardo  Charles Russell Speechlys, London
Tanja Schienke-Ohletz  Flick Gocke Schaumburg Partnerschaft mbB, Frankfurt

1030 – 1100 **Coffee/tea break**

1100 – 1215

**Is it possible to bulletproof your trust/foundation structure?**

The panel of international planners and litigators will discuss how to attack or defend trust and foundation structures in the face of ongoing challenges. The panelists will explore and help to navigate the nuances of civil and common law as it relates to cross border disputes.

**Session Co-Chairs**
Gretel Ciniglio de Perez  Fabrega Molino, Panama City; Latin American Regional Forum Liaison Officer, IBA Private Client Tax Committee
Michael Rutili  Stephenson Harwood, London

**Speakers**
Aurélie Conrad Hari  Bär & Karrer, Geneva
Filippo Noseda  Mishcon de Reya, London
Rafael Tavares Bassoli  Azevedo Sette Advogados, São Paulo
Laura Zwicker  Greenberg Glusker, Los Angeles, California

1215 – 1345 **Lunch**

1345 – 1500

**Should I stay, or should I go? Issues related to changing tax residency**

Humans have constantly migrated through the centuries, and often such moves are driven as much by events at home as much as by the attraction of a new place. Expatriation and pre-immigration planning have long been key concerns for international wealth planning. Different considerations today can drive migration, but for those families looking to lower their overall effective tax rates a permanent move must follow a process and sometimes comes with an initial fiscal cost. In this session we focus our discussion on departure rules and tax implications when leaving a jurisdiction. We also consider whether the clients might be at risk of not truly severing tax residency ties particularly where they still have family and businesses in the original jurisdiction.

**Session Co-Chairs**
Kira Egorova  ALRUD, Moscow; Committee Liaison Officer, IBA Private Client Tax Committee
Kevin Lee  Stephenson Harwood, Hong Kong; Publication and Newsletter Editor, IBA Private Client Tax Committee

**Speakers**
Carolina Fuensalida  Fuensalida & Del Valle Abogados, Santiago
Ellen Kratzer  Fiduciary Trust Company International, New York
Heiko Wunderlich  SKW Schwarz, Munich
Dhruv Janssen-Sanghavi  Nishith Desai Associates, Munich

1500 – 1530 **Coffee/tea break**

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**IBA Harassment Policy**

IBA conferences provide unrivalled professional development and network-building opportunities for international legal practitioners and their professional associates. The IBA values the participation of every delegate and member of the IBA and wants all attendees to have an enjoyable and fulfilling experience. Accordingly, all Conference attendees are expected to show respect and courtesy to other attendees, IBA staff and those involved with hosting the events throughout the Conference and at all Conference events, receptions, and parties, whether officially organised by the IBA or others. All delegates, guests, attendees, speakers, exhibitors, staff and volunteers at any IBA event are required to conform to the IBA Harassment Policy.

See [www.ibanet.org/iba-harassment-policy](http://www.ibanet.org/iba-harassment-policy)
Information

Date
3–5 March 2024

Venue
Raffles London at The OWO
Whitehall
London SW1A 2BX
Tel: +44 (0) 20 3907 7500
Email: london@raffles.com

Language
All working sessions and Conference materials will be in English.

How to register
Register online by 28 February at [www.ibanet.org/conference-details/CONF2341](http://www.ibanet.org/conference-details/CONF2341) and make payment by credit card to avail of the ten per cent online registration discount or complete the attached registration form and return it to the Conference Department at the IBA together with your proof of bank transfer payment. You should receive an email confirmation of your registration within five days; if you do not, please contact confs@int-bar.org.

Tuesday continued

1530 – 1645
Make it rain – advising Zennials
If we thought that advising our current clients is sometimes challenging, just wait until you deal with their children, or with the new generation entrepreneurs. This session will provide inputs and share experiences about dealing with the younger generation of wealth holders. We will see if it the type of wealth that is going to change, the characteristics of the clients, their financial needs, the advice they seek, or all of the above. Speakers across different ages and backgrounds will share their views, stories and insights, will try to help us to prepare for the next years in business, and will show us that even with AI, there are quite a few needs we can and must accommodate.

Session Chair
Inbal Faibish Wassmer  Goldfarb Gross Seligman, Zurich;
Vice-Chair, IBA Private Client Tax Committee

Speakers
Elina Filippou  Zepos & Yannopoulos, Athens
Stephanie Sebbagh  SVZ, Paris
 Jeannette Yazedjian  Sequent Group, Reno, Nevada

1645– 1715 Open Committee meeting
All delegates are invited to join the Committee Officers at an open business meeting to discuss the planning of next year’s London conference and other activities of the Private Client Tax Committee.

The organisers may at any time, with or without giving notice, in their absolute discretion and without giving any reason, cancel or postpone the Conference, change its venue or any of the other published particulars, or withdraw any invitation to attend. In any case, neither the organisers nor any of their officers, employees, agents, members or representatives shall be liable for any loss, liability, damage or expense suffered or incurred by any person, nor will they return any money paid to them in connection with the Conference unless they are satisfied not only that the money in question remains under their control but also that the person who paid it has been unfairly prejudiced (as to which, decision shall be in their sole and unfettered discretion and, when announced, final and conclusive).
List of participants
For your name to appear in the list of participants, your registration form must be received by 28 February at the latest.

Live delegate search
Delegates can use the live delegate search via the IBA website, in order to use this function delegates will need to be logged into their MyIBA. This will allow search access to up-to-date attendance lists.

Registration confirmation
Upon receipt of your payment for the Conference a confirmation email will be sent to you which contains information regarding your attendance at the Conference. You will also be able to view and download your payment information and manage your registration via your My IBA profile on the IBA website.

Photography and filming
Certain sessions and/or social functions may be photographed and/or filmed and some of this content may be used for future IBA marketing materials, member communications, products or services. Should you have any concerns about this, or do not wish to be featured in any of these materials please contact the IBA Marketing Department at ibamarketing@int-bar.org.

Promotional literature
Please note that no individual or organisation may display or distribute publicity material or other printed matter during the Conference, unless by prior arrangement with the IBA. Organisations and companies wishing to discuss promotional opportunities should contact the IBA Sponsorship Department at sponsorship@int-bar.org.

Fees
Online registrations received:

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After 28 February registrations must be received in hard copy at the IBA office.

Hard copy registration forms and fees received:

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After 28 February registrations must be received in hard copy at the IBA office.

*By paying the non-member fee, we welcome you as a delegate member of the IBA for the year in which this Conference is held, which entitles you to the following benefits:
1) Password access to certain parts of the IBA website.
2) Receipt of IBA E-news and access to online versions of IBA Global Insight.
3) Pay the member rate for any subsequent Conference registrations for this calendar year.

**A reduced rate is offered to IBA Corporate Group Members. Please contact confs@int-bar.org to obtain a 25 per cent discount on the IBA Member fee.

If you would like to become a full or general member of the IBA, which includes membership of one committee or more – and inclusion in and access to our membership directory – we encourage you to do so now to register for this Conference at the member rate. You can find full details of how to join at www.ibanet.org.

A reduced rate is offered to lawyers who are over the age of 65, have been an IBA member for more than 20 years and are no longer practising law. Please contact us for more information.

Full payment must be received to obtain your Conference documentation.
Fees include:
• Attendance at all working sessions.
• Access to the Conference materials from the IBA website (www.ibanet.org), including any available speakers' papers submitted to the IBA before 28 February.
• Access to live delegate search.
• Lunch on Monday and Tuesday.
• Tea and coffee during breaks.
• VAT currently at 20%.

Please note that registrations are not transferable.

Book with confidence
• If the IBA needs to reschedule the event, your registration will be automatically transferred to the new date and no additional fees will be charged. If this date is not convenient for a delegate, a refund of the cost of the conference place will be available on request to the IBA.
• If the IBA is unable to reschedule the conference within 12 months of the original scheduled date, a full refund of the cost of the conference place will automatically be made to all delegates.
• Please note that the IBA will not provide refunds for any costs incurred including any travel costs.

Please note, these terms are subject to any more restrictive or different local requirements and may be altered and amended from time to time to reflect any changes to restrictions or government requirements.
Payment of registration fees by bank transfer or BACS payment
Registration forms received without proof of payment will NOT be processed until proof of payment has been received.

Pounds sterling: by bank transfer or BACS payment to the IBA account number: 13270222 (Sort Code 56-00-03) at the National Westminster Bank, St James’s & Piccadilly Branch, 208 Piccadilly, London W1A 2DG, United Kingdom.

SWIFT address NW8KGB2, IBAN GB05NW8K56000313270222

Please ensure that a copy of the bank transfer details is attached to your registration form.

PLEASE ENSURE THAT YOUR NAME AND ‘CONF2341 LONDON’ APPEAR ON ANY TRANSFER OR DRAFT.

No deductions or withholdings
All fees payable to us by you in accordance with the terms contained in this ‘Information’ section shall be paid free and clear of all deductions or withholdings whatsoever.

If any deductions or withholdings are required by law to be made from any fees payable to us by you under the terms contained in this ‘Information’ section you shall pay such sum as will, after the deduction or withholding has been made, leave us with the same amount as we would have been entitled to receive in the absence of any such requirement to make a deduction or withholding.

If we obtain the benefit of any tax credit or other relief by reference to any such deductions or withholdings, then we shall repay to you such amount as, after such repayment has been made, will leave us in no worse position than we would have been had no such deductions or withholdings been required.

Travel arrangements and visas
Participants are responsible for making their own travel arrangements. It is recommended that you check your visa requirements with your local embassy or consulate. We are unable to dispatch visa invitation letters to support your visa application prior to receipt of your registration form and full payment of registration fees.

Please apply for your visa in good time.

Hotel accommodation
The IBA does not have a room block however if you wish to book accommodation at Raffles London at the OWO please make your reservation using the following hotel website link www.raffles.com/london/rooms-and-suites

Delegates are responsible for making accommodation reservations directly with the hotel and entering into an agreement with the hotel regarding credit card guarantees, cancellation terms and conditions, and room rates. The IBA cannot accept responsibility for hotel accommodation disputes between a delegate and the hotel.

Unauthorised accommodation agents
It has been brought to our attention that there are multiple companies contacting past attendees, claiming to represent the IBA, offering ‘assistance’ with registration and hotel bookings.

They are operating by cold-calling and spamming companies whose names have appeared on previous List of Participants, Programmes and Sponsorship recognition. The only Accommodation Agent the IBA works with is Judy Lane ICS. Judy Lane ICS do not contact delegates on behalf of the IBA without delegates making initial contact. Please ignore any communication that does not come directly from the IBA or Judy Lane ICS.

Conference sell-outs
The IBA places its conferences in venues of a suitable size for each event; however, there are times when our conferences may sell out. Should this happen, prospective delegates will be informed, and a waiting list will operate. The waiting list will function on a ‘first come, first served’ basis, subject to receiving registered delegate cancellations. The waiting list for a conference will close once it has reached ten per cent of the conference venue capacity, as it is very unlikely a place will become available. The IBA will not be liable for any travel or accommodation expenses incurred by an individual who travels to a conference without a confirmed place at the event.

Cancellation of registration or social functions
If cancellation is received in writing at the IBA office by 16 February 2024, fees will be refunded less a 25 per cent administration charge. Refunds will be made minus any monies owed to the IBA.

We regret that no refunds can be made after this date. Registrations or social function bookings received after 16 February will not be eligible for any refund of fees.

Should you have difficulties in obtaining your visa and are not able to attend the Conference this cancellation policy will still apply.

Upon submission of your completed Conference registration form to the IBA you are considered ‘registered’ pending payment. Please note that the cancellation terms and conditions as indicated will apply as soon as your registration is received.

Provided you have cancelled your registration to attend an IBA Conference in accordance with the terms of the ‘cancellation of registration’ clause included in the ‘Information’ section of the relevant Conference programme, you must then confirm to us in writing at the IBA office as soon as possible, but in no event later than one year (12 calendar months) from the date of any such Conference, all necessary details to enable any reimbursement owed to you to be paid. We regret that no refunds will be made after the date that is one year (12 calendar months) after the date of the relevant Conference.

Disabled access
Raffles London at the OWO is wheelchair accessible. Please notify us if you require special assistance.

Social programme

Sunday 3 March
1800 Hosted welcome reception
Phillips Auction House
30 Berkeley Square, Mayfair, London W1J 6EX

Conference reception kindly provided by Phillips Auction House.

All registered delegates are welcome to attend

Monday 4 March
1900 Conference reception and dinner
One Whitehall
1 Whitehall Place, London, SW1A 2HE

Price: £125

Social event places cannot be guaranteed unless payment has been received before 1 March, subject to availability.

One place per registered delegate is permitted.
Private Client Tax Committee overview:

The committee is concerned not only with what the law is but how it might develop in:

- Inheritance rights and succession rules
- Will making
- Lifetime giving
- Trusts
- Creditor claims against trusts and estates
- Regulatory compliance affecting trusts, including the tracing of proceeds of crime
- Charities, foundations and not-for-profit organisations
- Taxation of capital transfers and income; tax treaties
- Property rights of spouses and co-habitees
- Conflict of law rules

These matters are studied not only in the context of a sole jurisdiction but also with cross-border and multi-jurisdictional implications.

For more information please visit the Private Client Tax Committee home page.

Family Law Committee overview:

The Family Law Committee provides a unique forum for members from different countries and different legal systems to exchange views, meet during conferences and debate issues concerning the substantive and procedural aspects of family law. The work of the committee has focused on developments of international significance, involving all aspects of family law, for example, marriage, divorce, inheritance, human rights in the family, adoption, international child abduction, etc. There is a close interaction within the committee and its members through newsletters and via email.

The committee has ambitious aspirations for the future. It hopes to expand its membership and to encourage others to join the committee. Family law is at the core of general legal practice.

For more information please visit the Family Law Committee home page.
Registration form

29th Annual International Private Client Tax Conference
Navigating the private client world in turbulent times
3–5 March 2024, Raffles London at the OWO, London, England

Please read the ‘Information’ section before completing this form and return it together with your proof of bank transfer to the Conference Department at the address below.

REGISTER ONLINE AT WWW.IBANET.ORG/CONFERENCE-DETAILS/CONF2341 TO MAKE IMMEDIATE AND SECURE PAYMENT BY CREDIT CARD AND OBTAIN A TEN PER CENT DISCOUNT ON THE FEES BELOW

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SPECIAL DIETARY REQUIREMENTS
If you have special dietary requirements, due to allergen intolerances, medical, religious reasons or a life choice, please specify the requirement below. The IBA is unable to cater for dietary requirements other than for the above reasons.

☐ Please tick box if you have allergen intolerances and specify __________________________________________________________________________

Please state all other dietary requirements clearly, i.e. I am a vegetarian.

Disclosure of dietary information denotes you have agreed to the IBA sharing this information with relevant third parties who are providing catering on our behalf.

TO OBTAIN A TEN PER CENT DISCOUNT ON THE FEES BELOW, PLEASE REGISTER BY 28 FEBRUARY ONLINE AT WWW.IBANET.ORG/CONFERENCE-DETAILS/CONF2341
IBA MEMBERS CAN REGISTER ONLINE BY 19 JANUARY FOR £995. PLEASE SEE ‘INFORMATION’ FOR FURTHER ONLINE REGISTRATION DETAILS.

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<td>Corporate counsel**</td>
<td>£995</td>
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Social programme
Confidence dinner
☐ I will attend £125 £

One place per registered delegate is permitted

TOTAL AMOUNT PAYABLE £

*JOIN THE IBA TODAY AND REGISTER FOR THIS CONFERENCE AT THE IBA MEMBER RATE. PLEASE FIND THE MEMBERSHIP APPLICATION FORM AT WWW.IBANET.ORG.

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