



VIRTUAL 21ST ANNUAL U.S. AND EUROPE TAX PRACTICE TRENDS MARCH 22-25, 2021

Designed for private wealth planners and young lawyers, the Workshop sessions taking place March 22 will cover:

- Wealth Management Workshop: Tax transparency and beneficial ownership registers
- Wealth Management Workshop: Tax audits and criminal investigations of high net worth individuals in the transparency era
- Wealth Management Workshop: Prospects for tax legislation affecting wealth planning
- Young Lawyers Workshop: Key tax issues related to cryptocurrency

Designed for international tax professionals from industry and private practice, the Tax Practice Trends sessions taking place March 23-25 will cover:

- BREXIT related tax issues
- DAC 6 implementation challenges
- Transfer pricing: new cases and pandemic impact
- Distressed and non-distressed deals during the pandemic
- Lawyers and non-lawyers working together: privilege and ethical issues
- Corporate/M&A post reform
- New acquisition structures related to the ECJ Danish cases
- Cross-border disputes and bilateral resolution
- Government and OECD updates
- Key impacts of OECD recommendations on Pillars
- New tactics by governments in criminal tax enforcement



REGISTER TODAY AT [HTTPS://AMBAR.ORG/21TAXEURO](https://ambar.org/21taxeuro)

0900 – 1000 EDT / 1400 – 1500 CET

WEALTH MANAGEMENT WORKSHOP

Tax Transparency and Beneficial Ownership Developments Affecting Private Clients

This panel will provide an overview of tax transparency and beneficial ownership developments in the U.S., the U.K., and the European Union.

Co-Chairs

Severiano Ortiz, Kozusko Harris Duncan, Washington, DC

Emma White, Forsters LLP, London

Speakers

Stephanie Auferil, Arkwood SCP, Paris

Joanna Prokurat, Wardynski & Partners, Warsaw

1000 – 1030 EDT / 1500 – 1530 CET

WEALTH MANAGEMENT WORKSHOP

Networking ZOOM Break

1030 – 1115 EDT / 1530 – 1615 CET

YOUNG LAWYERS WORKSHOP

Panel I: Building Crypto Policy: the Government View

This panel explores the policy terrain of how governments are adapting to the increasing use of virtual currencies in everyday life – investments, purchases, bartering – and developing tax rules accordingly. Government panelists will share their views and experiences in analyzing how cryptocurrencies fit into existing tax frameworks, where they are having to break new ground, and tactics used in the enforcement sphere.

Co-Chairs

Jeremiah Coder, PwC, Washington, DC

Niklas Schmidt, Wolf Theiss, Vienna

Speakers

Erika Bonner, Ernst & Young LLP, San Francisco, CA

Ksenija Cipek, Head of Tax Risk Analysis, Ministry of Finance Croatia, Zagreb

Julien Jarrige, G20 Tax Adviser, OECD, Paris

Amanda Wick, Chief of Legal Affairs, Chainalysis Inc., Washington, DC

1030 – 1145 EDT / 1530 – 1645 CET

WEALTH MANAGEMENT WORKSHOP

Tax Audits and Criminal Investigations of High Net Worth Individuals in the Transparency Era

This panel will provide an overview regarding recent tax controversy developments in Germany, Italy, Switzerland and the U.S.

Co-Chairs

Thierry Boitelle, Bonnard Lawson, Geneva

Dianne Mehany, Caplin & Drysdale, Washington, DC

Speakers

Gerd Kostrzewa, Heuking Kühn Lüer Wojtek, Düsseldorf

Nicola Saccardo, Maisto e Associati, London

1115 – 1130 EDT / 1615 – 1630 CET

YOUNG LAWYERS WORKSHOP

Networking ZOOM Break

1130 – 1245 EDT / 1630 – 1745 CET

YOUNG LAWYERS WORKSHOP

**Panel II: Responding to a Mess(ier)
Crypto Tax Landscape**

This follow-on panel tackles the myriad problems that arise for taxpayers and advisers in navigating no, new, and confusing rules in trying to comply in a rapidly evolving environment. Speakers will address frequent compliance issues, such as computing basis, dealing with conversions/forks, and dealing with confidentiality issues, as well as providing practical advice on guiding taxpayers through challenging enforcement actions.

Co-Chairs

Jeremiah Coder, PwC, Washington, DC
Niklas Schmidt, Wolf Theiss, Vienna

Speakers

Franziska Hertel, Ropes & Gray LLP, Boston, MA
Antti Lehtimaja, Krogerus, Helsinki
Gianluca Mazzoni, Alvarez & Marsal Taxand LLC, Washington, DC
Miguel Pimentel, Garrigues, Lisbon

1145 – 1200 EDT / 1645 – 1700 CET

WEALTH MANAGEMENT WORKSHOP

Networking ZOOM Break

1200 – 1245 EDT / 1700 – 1745 CET

WEALTH MANAGEMENT WORKSHOP

Prospects for Tax Legislation

This panel will provide an update on possible new tax legislation (some related to COVID-19 and some not) in Spain, the U.K. and the U.S. which will affect high net worth individuals and family offices.

Chair

Alan Winston Granwell, Holland & Knight LLP, Washington, DC

Speakers

Guadalupe Díaz-Súnico, Lener, Barcelona, Spain
Emma-Jane Weider, Maurice Turnor Gardner, London

1245 – 1345 EDT / 1745 – 1845 CET

WEALTH MANAGEMENT WORKSHOP

Networking ZOOM Event

1245 – 1345 EDT / 1745 – 1845 CET

YOUNG LAWYERS WORKSHOP

**Networking ZOOM Event: Practicing
During the Pandemic**

0900 – 0945 EDT / 1400 – 1445 CET

Opening Plenary and Keynote Address

Introduction by Conference Co-Chairs

Kat Saunders Gregor, Ropes & Gray LLP,
Boston, MA

Reto Heuberger, Homburger, Zurich

Margriet Lukkien, Loyens & Loeff, Amsterdam

Stanley C. Ruchelman, Ruchelman P.L.L.C.,
New York, NY

Carol Tello Fellowship Award Announcement

Joan C. Arnold, Troutman Pepper,
Philadelphia, PA

Richard M. Lipton, Baker McKenzie, Chicago, IL

Keynote Speaker

Andrew Strelka, Senior Tax Counsel, The
White House, Washington, DC, USA

0945 – 1045 EDT / 1445 – 1545 CET

CONCURRENT SESSION 1

Brexit Happened: Now What?

A closer look at how Brexit might shape the
future of tax:

- Challenges, and opportunities
- The future of cross border imports and exports
- Decisions for fund managers

Co-Chairs

Jessica Kemp, Travers Smith LLP, London

Joshua D. Odintz, Holland & Knight LLP,
Washington, DC

Speakers

Peter Adriaansen, Loyens & Loeff, Luxembourg

Torsten Engers, Flick Gocke Schaumburg,
Frankfurt am Main

Rachel Fox, William Fry, Dublin

Alex Jupp, Skadden, Arps, Slate, Meagher &
Flom LLP, London

0945 – 1045 EDT / 1445 – 1545 CET

CONCURRENT SESSION 2

Hallmark Hall of Mirrors: DAC6

Implementation Experiences

This panel will assess what we have learned
thus far from the implementation of the
2018 European Commission Directive on
administrative cooperation in the field of
taxation (DAC 6). Among other topics,
panellists will discuss:

- Issues arising from varying/inconsistent standards of implementation among Member States of the EU;
- Challenges for practitioners arising from complex, multijurisdictional planning (e.g., what information must be disclosed and to which jurisdictions? Which practitioners have the obligation to disclose? Is coordination among different firms desirable or necessary?);
- Concerns of taxpayers (e.g., when is the disclosure obligation imposed on taxpayers? What confidentiality concerns are raised? Do taxpayers have the right or ability to take ownership of disclosure regarding their transactions?);
- Whether the compliance burdens imposed on practitioners and taxpayers are commensurate with the likely value of the information to tax authorities;
- Whether future changes are likely to lessen administrative burdens or increase the scope of information required?;
- How does DAC 6 fit within the broader context of the transparency debate currently taking place within the EU?;
- Is DAC 6 impacting on taxpayer “behaviour”?

Co-Chairs

Patrick Brown, PwC, Washington, DC
James Somerville, A&L Goodbody, Dublin

Speakers

Antonio Barba, Cuatrecasas, Madrid
Petra Eckl, GSK Stockmann, Frankfurt am Main
Jan van den Tooren, Hamelink & van den Tooren, Amsterdam
Christian Wimpissinger, Binder Grösswang, Vienna

1045 – 1115 EDT / 1545 – 1615 CET

Networking ZOOM Break

1115 – 1230 EDT / 1615 – 1730 CET

CONCURRENT SESSION 1

New Transfer Pricing Developments: 2020 Key Cases and Pandemic Impact

The panel will focus on the impact of the pandemic on transfer pricing policies and operations, including OECD guidance. Panelists will look at the interplay between these dynamics and other developments, including the Coke case in the US, the Apple state aid decision and the Adecco decision in Denmark. In addition, the panel will feature the perspectives of tax executives on navigating changing TP laws and substantiation requirements during this turbulent economic period.

Co-Chairs

Kat Saunders Gregor, Ropes & Gray LLP, Boston, MA
Nikolaj Bjørnholm, Bjørnholm Law, Hellerup

Speakers

Sven Bremer, Head of Transfer Pricing, Siemens, Munich
Stuart Chessman, Vivendi S.A., New York, NY
Francesca Fracassi, Q8 Kuwait Petroleum Italia S.p.A., Rome
Mayra Lucas, Senior Advisor, Transfer Pricing, OECD, Paris

1115 – 1230 EDT / 1615 – 1730 CET

CONCURRENT SESSION 2

Selected Distressed and Non-Distressed Deals During the Pandemic

The pandemic has seen a change in the landscape of deals, which raises novel issues for advisers. The use of Special Purpose Acquisition Companies (SPACs) has dramatically increased. In an effort to deal with business uncertainty, contingent consideration and rollover equity are becoming a greater component of consideration paid by buyers. Distressed property sales have grown, which raises issues on how to deal with existing debt and limit adverse tax effects for borrowers and lenders alike. Broken deals have increased raising even more complexity.

Co-Chairs

Michael Hirschfeld, Andersen Tax, New York, NY
Susanne Schreiber, Bär & Karrer AG, Zurich

Speakers

Guillermo Canalejo, Uría Menéndez, Madrid
Ailish Finnerty, Arthur Cox, Dublin, Ireland
Abraham (Avi) Reshtick, Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., New York, NY
Frank Tschesche, GvW Graf von Westphalen, Frankfurt am Main

0900 – 1015 EDT / 1400 – 1515 CET

CONCURRENT SESSION 1

Lawyer + Nonlawyers + Disclosure = Privilege Problems and Conflicts

Changes have occurred in the practice of law that affect the relationship between attorney and client. In the U.S., at least one state and various professional bodies have removed barriers to accountants and lawyers practicing in one firm. This comes at a time when the attorney-client privilege is under attack in Europe and the U.S. Whether it is DAC6 obligations in the E.U., DOTAS reporting in the U.K., the Corporate Transparency Act in the U.S., and the crime-fraud exception to privilege in several jurisdictions, cross border tax advisers face a challenging environment in regard to privilege and confidentiality. Panelists will address rules in the U.K, Belgium, Italy, France and the U.S. regarding (i) differences in the scope of privilege for litigators, planning attorneys, and accountants, (ii) regulatory obligations imposed on lawyers to report transactions, and (iii) hidden traps for advisers.

Co-Chairs

Annabelle Bailleul-Mirabaud, CMS Francis Lefebvre Avocats, Paris
Stanley C. Ruchelman, Ruchelman P.L.L.C., New York, NY

Speakers

Kimberly J. Majure, KPMG LLP, Washington, DC
Jonathan Peacock, 11 New Square, London
Stefano Petrecca, CBA Studio Legale e Tributario, Rome
Henk Verstraete, Stibbe, Brussels

0900 – 1015 EDT / 1400 – 1515 CET

CONCURRENT SESSION 2

Corporate/M&A—Post Reform

The panel will focus on practical hot topics for tax lawyers in M&A transactions, in particular the impact of the US tax reform, cross-border M&A (inversions, dual resident companies, SPACs), changes in NOL carry-back rules and how to manage tax risks in M&A transactions considering the impact of M&A insurance.

Co-Chairs

Layla J. Asali, Miller & Chevalier Chartered, Washington, DC
Reto Heuberger, Homburger, Zurich

Speakers

Olivier Dauchez, Gide Loyrette Nouel, Paris
Wiebe Dijkstra, De Brauw Blackstone Westbroek, Amsterdam
Gareth Miles, Slaughter and May, London
Kara Mungovan, Cravath, Swaine & Moore LLP, New York, NY

1015 – 1045 EDT / 1515 – 1545 CET

Networking ZOOM Break

1045 – 1215 EDT / 1545 – 1715 CET

CONCURRENT SESSION 1

Putting a Hold on Holding Companies Due to the ECJ Danish Cases? New Acquisition Structures

Following the ECJ Danish Cases, the use of holding companies is undergoing a thorough scrutiny in many jurisdictions. The panel will discuss, from a practical perspective, the impact of the Danish Cases on investment structures, taking into account the domestic case law and the administrative practice developed in the jurisdictions represented. The panelists will also address the new trends in investment structures.

Co-Chairs

Francesco Capitta, Facchini Rossi Michelutti, Milan

Rachel D. Kleinberg, Sidley Austin LLP, Palo Alto, CA

Speakers

Mike Carew, Kirkland & Ellis LLP, Chicago, IL

Sylvia Dikmans, Houthoff, Amsterdam

Francisco Lavandera, Garrigues, Barcelona

Anders Oreby Hansen, Lundgrens, Copenhagen

Thierry Lesage, Arendt & Medernach, Luxembourg

1045 – 1215 EDT / 1545 – 1715 CET

CONCURRENT SESSION 2

Fighting on Multiple Fronts: Cross-Border Disputes and Bilateral Resolution

In this panel we will discuss dispute prevention and dispute resolution mechanisms at the various stages of the tax administrative procedure.

We will start our panel with an up to date report from the IRS on MAP cases, in particular relating to transfer pricing topics, and an outlook on current projects on the domestic as well as the OECD level. The panel will then focus on case studies relevant to multiple jurisdictions, and will explore topics such as joint audits on the basis of the EU Administrative Assistance Directive, permanent establishments and the implementation of the EU Tax Dispute Resolution Directive, and challenging a GAAR in a MAP proceeding.

Co-Chairs

Annette Keller, McDermott Will & Emery, Munich
Sarah E. Paul, Eversheds Sutherland, New York, NY

Speakers

Jennifer Best, Director, Treaty and Transfer Pricing Operations Practice Area, IRS, Washington, DC

Dèlcia Capocasale, Cuatrecasas, Barcelona

Raul-Angelo Papotti, Chiomenti, Milan

Floran Ponce, Lenz & Staehelin, Geneva

1230 – 1330 EDT / 1730 – 1830 CET

Women in Tax Networking Event

The Women in Tax Forum is excited to announce a video interview with Karine Uzan Mercié, Group Head of Tax, LafargeHolcim. Prior to joining LafargeHolcim, Karine was the VP, Head of Tax & Corporate Strategic Initiatives for Coca-Cola European Partners. During a 1-hour interactive discussion on Zoom, we'll join Karine as she shares stories of success and resiliency throughout an exceptional career in tax, and we'll explore what it means to rely on adventure and risk as keys to success in career and life.

Featured Speaker

Karine Uzan Mercie, Group Head of Tax, LafargeHolcim, Paris

0900 – 1030 EDT / 1400 – 1530 CET

PLENARY SESSION

Government/OECD Updates

International tax topics of current interest will be discussed from the perspective of governments and the OECD. The discussion will include perspectives on the OECD pillars 1 & 2 and certain EU initiatives. From a US standpoint, a sampling of issues faced by the IRS in the regulatory process (including proposed regulations affecting the creditability of foreign taxes), the ruling process, treaty interpretation, and litigation will be addressed. Further topics of discussion will include UK tax developments (in particular in light of UK Budget Day), the tax certainty agenda, and the prospects for public country by country reporting.

Co-Chairs

Margriet Lukkien, Loyens & Loeff, Amsterdam
Danielle Rolfes, KPMG LLP, Washington, DC

Speakers

Peter H. Blessing, Associate Chief Counsel (International), Office of Chief Counsel, IRS, Washington, DC
Martin Kreienbaum, Director General of International Taxation, Federal Ministry of Finance, Berlin
Grace Perez-Navarro, Deputy Director, Centre for Tax Policy and Administration, OECD, Paris
Mike Williams, Director, Business and International Tax, HM Treasury, London

1030 – 1100 EDT / 1530 – 1600 CET

Networking ZOOM Break

1100 – 1230 EDT / 1600 – 1730 CET

CONCURRENT SESSION 1

Remaking International Tax for the 21st Century: Impact of and Outlook for OECD's Evolving Pillars

The Blueprints are in, and construction is scheduled to begin soon on the OECD/G20 Inclusive Framework's grand project to redesign the international tax system for the digital age. As the project advances toward a mid-summer deadline for planning approvals, its proposed nexus, profit allocation, and global minimum tax rules are already affecting companies' tax planning and structuring decisions.

Political consensus has thus far remained elusive, but will the new US administration make success more likely? Will technical and administrative complexity persist following pleas for simplification at the January public consultation? Our panel of US and European practitioners, joined by an OECD official, will assess the current state of play and likely prospects from the perspectives of taxpayers and tax administrations. How would each set of stakeholders define "success" for this project? What are the implications of success (or failure) for global investment, systemic stability, and tax revenue? And what will it take to get Pillar One, Pillar Two, or both over the line?

Co-Chairs

Sandy Bhogal, Gibson Dunn, London
Elizabeth J. Stevens, Caplin & Drysdale, Washington, DC

Speakers

Paul D. Carman, Chapman and Cutler LLP, Chicago, IL
Pia Dorfmueller, Dentons, Frankfurt am Main
Joe Duffy, Matheson, Dublin
Grace Perez-Navarro, Deputy Director, Centre for Tax Policy and Administration, OECD, Paris

1100 – 1230 EDT / 1600 – 1730 CET

CONCURRENT SESSION 2

New Tactics by Governments in Criminal Tax Enforcement

Despite the pandemic, governments around the world are actively investigating and prosecuting tax crimes. These investigations involve some of the most complex and sophisticated financial transactions we have seen to date, including the cum-ex investigations in Germany, Belgium, and Denmark involving more than 1,000 suspects, and the complex financial dealings of high wealth individuals engaged in broad, cross-border conduct. To identify and effectively prosecute these cases, governments are deploying all available resources and investigative tools. This panel will address some of those tools, including investigative interviews, search warrants, and exchange of information provisions.

In addition, the panelists will delve into several hot topics in global criminal tax enforcement, including the focus on professional enablers and facilitation of tax evasion, use of deferred and non-prosecution agreements, and the application of double jeopardy. Finally, the panelists will discuss some of the “ripped from the headlines” cases in their respective jurisdictions.

Co-Chairs

Caroline D. Ciralo, Kostelanetz & Fink, LLP,
Washington, DC

Sabine Stetter, stetter Attorneys at Law, Munich

Speakers

Felice D'Acquisto, LMS Studio legale, Rome

Lawrence S. Feld, Law Office of Lawrence S.
Feld, New York, NY

Jessica Parker, Corker Binning, London

Alice Rousseau, Alice Rousseau Avocats, Paris

INFORMATION

DESCRIPTION

The Virtual 21st Annual U.S. and Europe Tax Practice Trends Conference will focus on practical tax practice trends for multinational corporations and their international advisors, as well as provide insight into how government tax officials may view the international tax landscape in light of important international developments that impact corporate taxpayers. Panelists will include industry leaders, senior government and OECD officials, and leading tax practitioners from the United States and Europe.

Designed for international tax professionals from industry and private practice, sessions will cover:

- BREXIT related tax issues
- DAC 6 implementation challenges
- Transfer pricing: new cases and pandemic impact
- Distressed and non-distressed deals during the pandemic
- Lawyers and non-lawyers working together: privilege and ethical issues
- Corporate/M&A post reform
- New acquisition structures related to the ECJ Danish cases
- Cross-border disputes and bilateral resolution
- Government and OECD updates
- Key impacts of OECD recommendations on Pillars
- New tactics by governments in criminal tax enforcement

REGISTRATION

Registration is available at the following website: <https://ambar.org/21taxeuro>. All individuals attending any part of the Workshop and Conference must register and pay the applicable fee. Payment may be by check, credit card, or wire transfer. Email taxmeeting@americanbar.org to pay by wire transfer or for group registration options (discounts available).

Registration Categories and Fees	Through March 12	After March 12
ABA, IBA, IFA Members and Past Conference Attendees	\$300	\$330
Non-Member	\$600	\$660
Workshops Only	\$100	\$110
Tax Executive	\$100	\$110
Young Lawyer (under 35 years)	\$100	\$110
Government Attorney	\$100	\$110
Academic	\$325	\$325
Non-Profit	\$25	\$25
Full-Time Law Students	FREE	FREE

REGISTER TODAY AT [HTTPS://AMBAR.ORG/21TAXEURO](https://ambar.org/21taxeuro)

INFORMATION

CLE CREDIT

The American Bar Association will seek 11.25 CLE credit hours in 60-minute states and 13.5 CLE credit hours 50-minute states. Credit hours are estimated and are subject to each state's approval and credit rounding rules. For more information about CLE accreditation in your state, please email tim.brady@americanbar.org.

ABA OPEN MEETINGS POLICY

In accordance with the American Bar Association Open Meetings Policy, all ABA programs are open to the media unless they are to conduct business sessions of a confidential nature. The Association encourages media coverage of its activities. If you have questions about this policy, please contact the ABA Tax Section at +1.202.662.8670.

CONTENT DISCLAIMER

All Workshop and Conference content, including live, recorded, and written presentations, represents the opinions of the authors and speakers and should not be construed to be those of either the American Bar Association or Section of Taxation unless adopted pursuant to the bylaws of the Association. Nothing contained herein is to be considered as the rendering of legal advice for specific cases, and readers are responsible for obtaining such advice from their own legal counsel. This Workshop and Conference content and any forms and agreements herein are intended for educational and informational purposes only.

All rights reserved. No part of these materials may be reproduced, stored in a retrieval system, or transmitted, in any form by any means, electronic, mechanical, photocopying, recording, or otherwise, without the written permission of the American Bar Association.

PHOTOGRAPHY AND VIDEO

Note that by attending the Conference, attendees have agreed to the terms of the American Bar Association Image/Audio/Video Release which allows images, audio, and video recorded on site to be used for educational and promotional purposes by the American Bar Association.

REGISTER TODAY AT [HTTPS://AMBAR.ORG/21TAXEURO](https://ambar.org/21taxeuro)

ORGANIZATION

CONFERENCE AND WORKSHOP PLANNING COMMITTEE

Joan C. Arnold, Troutman Pepper, Philadelphia, PA
Annabelle Bailleul-Mirabaud, CMS Francis Lefebvre Avocats, Paris
Sandy Bhogal, Gibson Dunn, London
Thierry Boitelle, Bonnard Lawson, Geneva
Francesco Capitta, Facchini Rossi Michelutti, Milan
Stuart Chessman, Vivendi S.A., New York, NY
Alan Granwell, Holland & Knight, Washington, DC
Kat Saunders Gregor, Ropes & Gray LLP, Boston, MA (*Conference Co-Chair*)
Reto Heuberger, Homburger, Zurich (*Conference Co-Chair*)
Hal Hicks, Skadden, Arps, Slate, Meagher & Flom LLP, Washington, DC
Annette Keller, McDermott Will & Emery, Munich
Jessica Kemp, Travers Smith LLP, London
Margriet Lukkien, Loyens & Loeff, Amsterdam (*Conference Co-Chair*)
Kimberly J. Majure, KPMG LLP, Washington, DC
Amelia O'Beirne, A&L Goodbody, Dublin
Anders Oreby Hansen, Lundgrens, Copenhagen
Severiano Ortiz, Kozusko Harris Duncan, Washington, DC
Grace Perez-Navarro, OECD, Paris
Stanley C. Ruchelman, Ruchelman P.L.L.C., New York, NY (*Conference Co-Chair*)
Niklas Schmidt, Wolf Theiss, Vienna
Dirk Suringa, Covington & Burling LLP, Washington, DC
Ewout van Asbeck, Van Doorne N.V., Amsterdam
Sonia Velasco, Cuatrecasas, Barcelona

PAST LOCAL CONFERENCE CHAIRS (2015-2019)

Michel Collet, CMS Francis Lefebvre Avocats, Paris (2019)
Olivier Dauchez, Gide Loyrette Nouel, Paris (2019)
Carola van den Bruinhorst, Loyens & Loeff N.V., Amsterdam (2018)
Peter Flipsen, Simmons & Simmons LLP, Amsterdam (2018)
Albert Collado, Garrigues, Barcelona (2017)
Sonia Velasco, Cuatrecasas, Barcelona (2017)
Bruno Gangemi, Macchi di Cellere Gangemi, Rome (2016)
Stefano Petrecca, Macchi di Cellere Gangemi, Rome (2016)
Pia Dorfmueller, P+P Pöllath + Partners, Frankfurt am Main (2015)

REGISTER TODAY AT [HTTPS://AMBAR.ORG/21TAXEURO](https://ambar.org/21TAXEURO)

PRIMARY ORGANIZATIONAL CO-SPONSORS

American Bar Association Section of Taxation

1050 Connecticut Avenue, NW, Suite. 400, Washington, DC 20036 <http://americanbar.org/tax>

As the national representative of the legal profession, the mission of the ABA Section of Taxation is to serve our members and the public through education and leadership to achieve an equitable, efficient, and workable tax system. The Tax Section puts all of the latest information on administrative and procedural developments right at your fingertips. Our publications, programs, and expert advice help you navigate the constantly changing landscape of tax law.

International Bar Association, Taxes Committee

4th Floor, 10 Saint Bride Street, London EC4A 4AD, England <http://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.

International Fiscal Association – USA Branch

2604 Elmwood Avenue, Suite 347, Rochester, NY 14618, USA <http://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.