

LATIN AMERICAN PRIVATE CLIENTS

Elections of J. Bolsonaro and A. M. López Obrador, Argentina's crisis:
pro-active tax & estate planning strategies in times of political instability



Javier Canosa

CANOSA ABOGADOS, BUENOS AIRES

Ezequiel Lipovetzky,

BRUCHOU, BUENOS AIRES

Ricardo Leon Santacruz,

SANCHEZ DEVANNY, MONTERREY

Luis Gerardo Del Valle,

JAUREGUI Y DEL VALLE, S.C., MEXICO

Fernando Retzler Martins,

SV LAW, SAO PAULO

Priscila Stela Mariano da Silva

PINHEIRO NETO ADVOGADOS, S. PAULO

Thiago Hohl,

CH LAW, SAO PAULO

Fabio Pegas,

NOGUEIRA PEGAS, LISBON

Alejandro Gil Rivero,

SOPHOS ADVISORS, MIAMI

Jorge Carstensen,

SOPHOS ADVISORS, MIAMI

BRAZIL, MEXICO, ARGENTINA

- > Political situation and tax reforms (announced and anticipated)
- > Game changers and clients' needs in terms of wealth planning strategies, products and services in the current context
- > Restructuring: why? what for? how?
- > Structures to re-invest in Brazil / Mexico / Argentina from abroad
- > CFC rules: new strategies and most recent exposures
- > Choosing the holding jurisdiction after BEPS/ATAD/MLI
- > Impact of new offshore entities economic substance requirements
- > PPLI and captive insurance: a growing interest in Mexico, Brazil...
- > Transfer of residence for Brazilian and Mexican families
- > Estate planning strategies: how to anticipate the creation of a gift and estate tax in Mexico

MEDIA PARTNER

AGEFI

19 & 20 JUNE 2019, GENEVA, HOTEL PRESIDENT WILSON

LATIN AMERICAN PRIVATE CLIENTS

WEDNESDAY 19 JUNE 2019

8.50 Introduction by the chairman of the conference
Fernando Retzler Martins, Partner, SV Law, Sao Paulo

POLITICAL/FISCAL GAME CHANGERS - CLIENTS' PSYCHOLOGY AND NEEDS IN 2019

Game changers and clients' needs in terms of wealth planning strategies, products and services in the current context

9.00 BRAZIL

• Political and economic situation and fiscal reforms under the presidency of J. Bolsonaro in Brazil

Priscila Stela Mariano da Silva, Senior Associate – Tax, Pinheiro Neto Advogados, Sao Paulo

9.40 MEXICO

• Political and economic situation and fiscal reforms under the presidency of AMLO in Mexico

• What is keeping UHNW Mexicans up at night: labor environment, exchange of information, corruption and "the wall"
Ricardo Leon Santacruz, Partner, Sanchez Devanny, Monterrey

10.20 ARGENTINA

• Political and economic situation, fiscal reforms in Argentina
Javier Canosa, Partner, Canosa Abogados, Buenos Aires

11.00 Coffee break

"RESTRUCTURING": WHY? WHAT FOR? HOW?

11.20 ARGENTINA

• What are the reasons and objectives of restructuring?
• Necessary restructuring of complex and redundant structures
• Tax reform in Argentina – analysis of restructuring
• Tax transparent and non-tax transparent structures – pros and cons
• The search and interest for alternative structures: avoiding legal personality; circumventing "control"; what works and what does not work

Ezequiel Lipovetzky, Partner, Bruchou, Buenos Aires

11.50 **BRAZIL: Priscila Stela Mariano da Silva**

12.20 **MEXICO: Ricardo Leon Santacruz**

12.50 Lunch

INVESTING FROM ABROAD AND CFC RULES

14.00 BRAZIL

- Myths and facts about CFC rules.
- Main strategies, advantages, disadvantages, new strategies and most recent exposures.
- What are the possible changes in CFC legislation for individuals? What shall Brazilian clients do?
- What are the new constraints on the strategies used to reinvest foreign funds in Brazil?

Fernando Retzler Martins, Partner, SV Law, Sao Paulo

14.30 MEXICO

- How is CFC legislation applied? Benefits and opportunities afforded by the CFC legislation
- How do Mexican clients reinvest foreign funds in Mexico?

Ricardo Leon Santacruz

15.00 ARGENTINA

- The tax reform of 2017 imposed new CFC rules; how has the reform been applied in practice?
- Main strategies, advantages, disadvantages, new strategies and most recent exposures.

Ezequiel Lipovetzky

15.30 Coffee break

CHOOSING THE JURISDICTION OF THE HOLDING COMPANIES AFTER BEPS/ATAD AND THE MLI

15.50 ARGENTINA

- What is the impact of the implementation of the ATAD by the main holding jurisdictions used to invest in Brazil, Mexico and Argentina (USA, Netherlands, Spain, Switzerland, UK, Uruguay, Cayman, BVI) on the choice of the holding?
- Alternatives to invest in Argentina from abroad
- Pros and cons of each alternative

Ezequiel Lipovetzky

16.20 MEXICO

- Has the U.S. tax reform changed investing structuring into your jurisdiction?

Ricardo Leon Santacruz

16.50 BRAZIL

- New Brazil-Switzerland DTT (not yet ratified): the first DTT after the MLI (LOB clause); what implications in practice?

Fernando Retzler Martins

17.20 End of the first day of the conference

THURSDAY 20 JUNE 2019

8.50 Introduction by the chairman of the conference
Fernando Retzler Martins, Partner, SV Law, Sao Paulo

OFFSHORE ENTITIES AND ECONOMIC SUBSTANCE REQUIREMENTS

- The new economic substance requirements imposed by the EU to offshore jurisdictions (Guernsey, Jersey, Cayman Islands, BVI, Bermuda, Bahamas passed laws in December 2018 to avoid the EU blacklist) notably on companies and funds
- What are the rules relative to non-cooperative and low or zero-tax jurisdictions in Brazil, in Mexico and in Argentina?
- Which offshore entities are used by clients?
- What measures need to be made to comply with the new substance requirements?

9.00 BRAZIL

- Should Brazil expect any impact from the new economic substance requirements imposed by the EU to offshore jurisdictions?
 - What adjustments should Brazilian companies controlled/ invested by offshore companies and funds should made?
 - How Brazilian families estate planning strategies could be affected?
- What are the rules relative to non-cooperative and low or zero-tax jurisdictions in Brazil?
 - Brazil's blacklist and tax and regulatory aspects.
- Which offshore entities are used by Brazilian clients?
 - Where is the Brazilian investment located abroad? Where are Brazilians investing abroad?
 - What are the main regulatory aspects of Brazilian investment abroad?
- How to comply with the Brazilian substance requirements to offshore holding companies?
 - The legal definition and the administrative and judicial courts approaches
 - Applicable measures to be in compliance with substance requirements

Thiago Hohl, Partner, CH Law, Sao Paulo

9.30 MEXICO

Luis Gerardo Del Valle, Partner, Jauregui y Del Valle, S.C., Mexico

10.00 ARGENTINA

Javier Canosa, Partner, Canosa Abogados, Buenos Aires

10.30 Coffee break

LIFE INSURANCE AND CAPTIVE INSURANCE

10.50 PPLI for Latin American clients

- Substance and form of insurance contracts to move away from traditional 101% products. Transferring risk to the insurer and US PPLI products for the foreign national market
- Transferring governing law of an insurance contract
- Domestic PPLI products with assets held offshore
- Regional Updates: Mexico, Colombia, Ecuador and Peru
- The growing interest for Life Insurance in Mexico

Alejandro Gil Rivero Managing partner, Sophos Advisors, Miami and Jorge Carstensen, Managing partner, Sophos Advisors, Miami

11.30 Captive insurance for Mexican clients

- Captive definitions and applications
- Captive insurance as a wealth accumulation tool for families
- Changes in Mexican tax law that benefit the use of captive
- Real cases
- Role of captives in private wealth

Alejandro Gil Rivero and Jorge Carstensen

TRANSFER OF RESIDENCE

12.10 MEXICO

- Transfer of residence for Mexican clients

Luis Gerardo Del Valle

12.40 Lunch

13.50 BRAZIL

- Transfer of residence for Brazilian clients

Fabio Pegas, partner, Nogueira Pegas, Lisbon

ESTATE PLANNING STRATEGIES

14.50 MEXICO

- Estate planning strategies for Mexican clients/families in anticipation of a gift and estate tax: "exposed" strategies and compliant/efficient strategies

Luis Gerardo Del Valle

15.30 Coffee break

15.50 BRAZIL

- The reasons behind the new interest for estate planning strategies
 - Economical and political factors in Brazil
 - Potential tax reforms and increase on tax inspections
 - Protection of wealth and change of domicile
- Estate planning strategies for Brazilian clients/families: "exposed" strategies and compliant/efficient strategies
 - Donation (foreign donors, assets located abroad) and donation with restrictive clauses
 - Life insurance: increase interest by HNWI. Could a Brazilian use a foreign life insurance?
 - Other alternatives
- Use of trusts and foundations by Brazilian clients
 - What may be the potential impacts of the indirect use of trusts by Brazilians?
 - Lack of rules: what are the regulatory implications in Brazil?
 - Reporting obligations for the involved parties (trustees, settlors and beneficiaries)

Thiago Hohl

16.30 ARGENTINA

- Estate planning strategies for Argentinean families
- How are the new fiscal rules relative to trusts applied? Is the trust the only tool left in the toolbox?

Javier Canosa

17.10 End of the conference

LATIN AMERICAN PRIVATE CLIENTS

19 & 20 JUNE 2019, GENEVA, HOTEL PRESIDENT WILSON

Venue

Hotel President Wilson
Quai Wilson 47, Geneva

How to register

by phone: +41 (0) 22 849 01 11
by fax: +41 (0) 22 849 01 10
by e-mail: info@academyfinance.ch
by post: Academy & Finance SA
PO Box 6069, CH-1211 Geneva 6
www.academyfinance.ch

Fees

- 19 & 20 June: 2360 CHF
 - One day only: 1280 CHF
- Prices do not include the Swiss VAT (7.7%).
Additional registrations from the same
company: - 50%

Registration and payment

Payment is made by bank transfer or by
credit card. Credit card payments will be
debited immediately upon receipt of card de-
tails. You will receive an invoice if you choose
to pay by bank transfer. You will receive a
credit card receipt if you choose to pay by
credit card.

Substitution & cancellation policy

Substitutions from the same company are
accepted at any time. Cancellation requests
must be received in writing, by fax or by post
up to the following dates end of business :

- 19 May 2019 refund of 80%
- 5 June 2019 refund of 30%
- after 5 June 2019 no refund will be made
for cancellation.

I register for the conference "Latin American private clients" and I choose:

- 19 & 20 June 2019 19 June 2019 only 20 June 2019 only

Accommodation

- Please send me the hotel booking form with preferential rates

You can also register by telephone: + 41 (0)22 849 01 11

1ST PARTICIPANT

Full name

Position

E-mail.....

2ND PARTICIPANT (-50%)

Full name

Position

E-mail.....

Company

Address

Postcode..... City

Tel Fax

Bank transfer Mastercard VISA AMEX

Card No / / / Expiry Date /

Name of card holder

Address of AMEX card holder

Date Signature