



the global voice of
the legal profession

A Conference presented by the Committees on Individual Tax and Estate Planning, Wills, Trusts and Succession and Art, Cultural Institutions and Heritage Law of the IBA Legal Practice Division and supported by the Section of International Law of the American Bar Association

Up to
10³/₄ CPD hours
available*



11th Annual Conference

International Wealth Transfer Practice

Trust, tax, wealth and business planning for artists and sportspersons

6-7 March 2006

**The Landmark London
LONDON, England**

At this Conference, experts from all over the world will address panel topics from the perspective of their jurisdictions, followed by an interactive panel discussion.

Sessions will cover topics such as the 'Structuring of contracts', 'Trusts', 'Tax planning' and 'Past, present and future planning' for artists and sportspersons.

* As per the Law Society of England and Wales. The number of CPD points/hours available may vary for other Bar Associations and Law Societies depending on their criteria.

Who should attend?

Advisers on arts and sports law and those representing artists and sportspersons. Also international tax lawyers, trust company officers, in-house counsel working for trust companies and banks and compliance officers.

Programme

Conference Chair Edgar H Paltzer *Niederer Kraft & Frey, Zurich*
Organising Committee Cristina Manasse *Studio Legale Rubini, Milan*
Christopher Potter *Jones Day, Paris*
Monica Reyes *Brigard & Urrutia, Bogotá*
Paul Sczudlo *Loeb & Loeb LLP, Los Angeles*
Lian Ee Teoh *Drew & Napier LLC, Singapore*

Conference Format

Panellists will first address the panel topics from the perspective of their respective jurisdictions followed by an interactive discussion with the other panellists.

These subsequent discussions are based on the same case study throughout the two-day conference. This 'conference case study' shall serve as a red line connecting the panels with each other and shall also facilitate the discussion as members of the audience do not have to memorise different case studies.

Conference Case Study

Last summer on the Côte d'Azur, the world-famous tennis player Björn Becker met magnetic pop superstar Modanna. Modanna has been living in several locations throughout the world, preferring the life in Europe to that of the US.

Several months later, the couple announce their engagement with the wedding date set for the following spring. Unwilling to extinguish their blazing flame of love by talking money and finances, they instruct their respective legal counsels to handle such issues and to use this opportunity to review each other's wealth management from a legal point of view.

Recreationally, Modanna dedicates a considerable amount of time to painting. Since her paintings are increasingly popular and pricy, Modanna asks the legal counsels to include issues arising from her hobby in the legal analysis.

As Björn will participate in the Retired Tennis Pro Championship 2006, and Modanna is about to launch her European Tour, both their counsels understand that they should focus on contract structuring and alternative agreements for their planned performances. Furthermore, they are both concerned with intellectual property rights and protecting their royalties, licensing fees and revenues. Björn is appalled by all the cheap imitations of his merchandising products, while Modanna discovered that anyone can download her songs and music videos for free on the internet.

Day one

During the morning session, a panel of experts presents contractual solutions for the couple, highlighting similarities and varieties of the problems arising for the athlete and the artist.

During the afternoon session, a panel of trust experts discusses the pros and cons of trusts or other vehicles to manage and protect intellectual property rights of the two clients. Additionally, the experts will take into account the planned wedding of the couple and seek solutions to protect the wealth of the spouses.

Day two

During the morning session, a panel of tax experts scrutinises the tax situation and perspective of the couple. Furthermore, the counsels consider a number of jurisdictions as possible domiciles for this couple.

Finally, during the afternoon session, all of the counsels discuss global trends in advising artists and sportspersons from all over the world.

Continuing Professional Development/ Continuing Legal Education

For delegates from countries where CPD / CLE is mandatory, the International Bar Association will be pleased to provide a Conference Certificate of Attendance which, subject to the exact CPD / CLE requirements, may be used to obtain the equivalent accreditation in your jurisdiction.

This Conference has been accredited for CPD / CLE by the Law Society of England and Wales.

Delegates should ask staff at the Registration Desk for information as to how to obtain the hours.

Monday 6 March

0800 – 1700 **Registration**

0830 – 0845

Conference welcome Introduction

Edgar H Paltzer

0845 – 1030

PANEL 1

Contracts (1/2)

Contract structuring and alternative agreements for services or performances by artists or sportspersons – protection of their legal position, earning power, image, intellectual property and other rights.

Panel Chair

Cristina Manasse *Studio Legale Rubini, Milan*

Panellists

Michael Bernasconi *Baer & Karrer, Zurich*

Michelle Brown *Davenport Lyons, London*

Enric Enrich *Enrich Advocats, Barcelona*

Mel Goldberg *Max Bitel Greene, London*

Jon Grouf *Kirkpatrick & Lockhart, New York*

1030 – 1100 **COFFEE BREAK**

1100 – 1215

Contracts (2/2) continued

1230 – 1400 **LUNCH**

1400 – 1515

PANEL 2

Trusts (1/2)

Use of trusts and legal entities for:

- Planning wealth creation and transfer.
- Protecting assets against divorce and creditor risks.
- Securing long-term financial needs.
- Preservation of wealth for future generations.
- Facilitating philanthropic activities.

Is the trust an appropriate vehicle for managing and protecting property rights during and after the lifetime of the artist or sportsperson?

Panel Chair

Lian Ee Teoh *Drew & Napier LLC, Singapore*

Panellists

Barbara Hauser *Cadwalader Wickersham & Taft LLP, New York*

Dr Roxana M Kahale *Beretta Kahale Godoy, Buenos Aires*

Masatami Otsuka *Jones Day, Tokyo*

Daniel Simon *Collyer Bristow, London*

Jean-Marie Vulliemmin *Froriep Renggli, Geneva*

1515 – 1545 **COFFEE BREAK**

1545 – 1645

Trusts (2/2) continued

1645 – 1700

Summary and questions

1930 – 2200

COCKTAIL RECEPTION AND GALA CONFERENCE DINNER Skinners' Hall

8½ Dowgate Hill, London EC4R 2SP

Kindly supported by:

Bermuda International Insurance
Services Ltd

Honourable Guest Speaker:

Professor Curtis Price, Principal of the Royal
Academy of Music, will address issues
arising with respect to musicians and
composers and their heritage.

The Skinners' Company is one of the 'Great
Twelve' livery companies with a history going
back some 700 years; the Hall dates from
1670, immediately after the Great Fire of
London. Skinners' Hall is a Grade I listed
building, rich in history and tradition,
beautifully refurbished with great style and
elegance, housing outstanding paintings,
coats of arms and period furniture.

A perfect setting for dinner.

Entry by ticket.

Dress: business suit.

Coach transfers from the Landmark London
will be provided.

Ticket price: £70.

Tuesday 7 March

0830 – 0845

Welcome address

Edgar H Paltzer

0845 – 1015

PANEL 3

Tax (1/2)

The first tax panel will focus on income tax
planning for singers, musicians, actors, other
entertainers, athletes and other sportspersons.
Tax planning and structuring alternatives will
be considered for their cross-border tours,
performances and other engagements of
their personal services, as well as licensing
and exploitation of copyrights and other
intellectual property. Topics considered will
include:

- Characterisation of income among various
categories of income (eg, performing
services, non-performing services, product
endorsement, licensing fees, etc) and
related structuring alternatives.
- Sourcing of compensation among
jurisdictions.

- Advisability of using personal service
companies for international engagements.
- Planning to minimise income tax and
social security tax withholding and the
imposition of VAT-type taxes.
- Application of artist and athletes articles
of income tax treaties.
- Tax treatment and planning for revenues
earned from the cross-border licensing
and exploitation of talent's names and
likenesses, copyrights and other
intellectual property.
- Tax treatment and planning for the receipt
of contingent participations and residuals
from the exploitation of films, recordings
and other media incorporating the
performances and images of entertainers
and athletes.
- Unique planning opportunities and
potential traps presented under the laws
of various representative jurisdictions.

Panel Chair

Monica Reyes *Brigard & Urrutia, Bogotá*

Panellists

Nigel Clay *Tenon Group Plc, Inkberrow,
Worcestershire*

Fred Feingold *Feingold & Alpert LLP,
New York*

Dr Dick Molenaar *All Arts Tax Advisers,
Rotterdam*

Sonia Velasco *Cuatrecasas, Barcelona*

1015 – 1045 COFFEE BREAK

1045 – 1230

PANEL 4

Tax (2/2) continued

The second tax panel will review definitions
and questions of tax residency and domicile
applicable to entertainers and athletes.

The discussion will focus on international
tax planning opportunities to structure the
entertainer's or athlete's residency in a tax-
advantaged manner, while reviewing the risk
and implications of establishing residency or
domicile in key jurisdictions. Topics
considered will include:

- Special tax rules applicable to international
entertainers and athletes who reside in
various jurisdictions.
- Favourable residency regimes in the United
Kingdom, Switzerland, Singapore and
other jurisdictions.
- Definitions of tax residency for income and
estate and gift tax purposes in the United
States, the United Kingdom, France,
Switzerland, Singapore and other key
jurisdictions.
- Tax treatment and planning opportunities
available to entertainers and athletes
terminating residency in key jurisdictions.
- The impact of citizenship and particular
visa status on residency and domicile
determination, as well as tax treatment.

- Risks and implications associated with dual
resident or dual nationality status.
- Determination of residency and domicile
under tax treaties.

Panel Chair

Paul A Sczudlo *Loeb & Loeb LLP, Los
Angeles*

Panellists

Christopher Potter *Jones Day, Paris*

Leslie J Powell *Davenport Lyons, London*

Lian Ee Teoh *Drew & Napier LLC, Singapore*

Dr Nedim Peter Vogt *Baer & Karrer, Zurich*

1230 – 1400 LUNCH

1400 – 1515

PANEL 5

Global trends

Past, present and future planning for artists
and sportspersons – global trends. What was
done before, what is happening now, and
what trends can we identify?

Panel Chair

Christopher Potter *Jones Day, Paris*

Panellists

Richard Hay *Stikeman Elliott LLP, London*

Edward E Lehman *Lehman Lee & Xu,
Beijing*

Cristina Manasse *Studio Legale Rubini,
Milan*

Julian Pike *Farrer & Co, London*

Howard Ricklow *Collyer~Bristow, London*

1515 – 1545 COFFEE BREAK

1545 – 1645

Summary and questions

1800 – 2000

COCKTAIL RECEPTION AND AWARDS

Collyer~Bristow offices, London

Sponsored by

Collyer~Bristow

AIB Jersey

Exhibitors at this Conference

Legal Week

Practical Law Company

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).

General Information

Date

6-7 March 2006

Venue

The Landmark London
222 Marylebone Road
London NW1 6JQ
tel: +44 (0)20 7631 8000
fax: +44 (0)20 7631 8080
www.landmarklondon.co.uk

Language

All working sessions and Conference materials will be in English.

How to register

Please complete the attached registration form and return it to Harriet Rowland at the IBA together with your payment. You should receive written confirmation of your registration within 14 days; if you do not then please contact Harriet Rowland at the above address.

Fees

Registration forms and fees received:

	<i>on or before 13 February</i>	<i>after 13 February</i>
IBA	£780	£880
Non member	£880	£980
Young Lawyers (under 30 years)	£585	£980
Academics/Judges (Full time)	£585	£980
Corporate Counsel	£705	£980
Conference Dinner	£70	£70

Full payment must be received in order to process your registration.

Fees include

- Attendance at all working sessions
- Conference materials, including any available speakers' papers submitted to the IBA before 13 February
- Access to the above Conference working materials from the IBA website (www.ibanet.org) approximately seven days prior to the Conference
- Lunch on 6 and 7 March
- Tea and coffee during breaks
- Invitation to cocktail reception and awards on 7 March

Please note that registrations are not transferable.

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 Louise Young at the IBA (louise.young@int-bar.org).

Payment of registration fees

Pounds sterling: by cheque or bank draft drawn on a UK bank and in favour of the International Bar Association. Please send to: 10th Floor, 1 Stephen Street, London W1T 1AT, United Kingdom.

OR by bank transfer to the IBA account number: 13270222 at the National Westminster Bank, St James's & Piccadilly Branch, (Sort Code 56-00-03), 208 Piccadilly, London W1A 2DG, United Kingdom or SWIFT address NWBKGB2L or IBAN GB05NWBK56000313270222.

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

Euro: by bank draft converted at the current rate of exchange and in favour of the International Bar Association.

OR by bank transfer to the IBA Bank Account Number 550/00/06570631 at the National Westminster Bank, St James's & Piccadilly Branch, (Sort Code 56-00-03), 208 Piccadilly, London W1A 2DG, United Kingdom SWIFT address NWBKGB2L or IBAN GB58NWBK60721106570631.

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

US dollars: by cheque or bank draft converted at the current rate of exchange and drawn on a US bank and in favour of the International Bar Association. Please send to: 1 Stephen Street, London W1T 1AT, United Kingdom.

OR by bank transfer to the IBA account number: 01286498 at the National Westminster Bank, St James's & Piccadilly Branch, (Sort Code 56-00-03), 208 Piccadilly, London W1A 2DG, United Kingdom.

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

Credit card payments: by Visa, Mastercard or American Express. **No other cards are accepted.**

PLEASE ENSURE THAT YOUR NAME AND THE WORDS 'CON830 + LONDON' APPEAR ON ANY TRANSFER OR DRAFT.

Cancellation of registration

If cancellation is received in writing at the IBA office by 3 February, fees will be refunded less a 25 per cent administration charge. We regret that no refunds can be made after this date.

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 send out letters supporting visa applications to embassies prior to receipt of your registration form and full payment of registration fees.**

Please apply for your visa in good time.

Hotel accommodation

A limited number of rooms have been reserved at the Landmark London:

The Landmark London

222 Marylebone Road
London NW1 6JQ
tel: +44 (0)20 7631 8000
fax: +44 (0)20 7631 8080

e-mail: reservations@thelandmark.co.uk for the nights of 5-6 March inclusive.

The following rates are per room, per night and exclusive of breakfast and VAT.

Single/Double occupancy: £195

Please complete the attached accommodation form and send it direct to the hotel to make your reservation. The hotel requires a credit card number to secure your reservation.

As a limited number of rooms have been blocked at the hotel, availability cannot be guaranteed once the room block is full.

Delegates are responsible for making accommodation reservations directly with the hotel and enter into an agreement with the hotel regarding credit card guarantees, cancellation terms and conditions, and room rates (should these differ from the special IBA rate). The IBA cannot accept responsibility for hotel accommodation disputes between a delegate and the hotel.

Cancellation and no-show policy

Cancellations received before 24 hours prior to arrival will not incur a cancellation charge, cancellations received after this deadline will incur a cancellation charge.

Disabled access

The Landmark London is wheelchair accessible. Please notify us if you require special assistance.

List of participants

In order for your name to appear in the list of participants, which will be distributed at the Conference, your registration form must be received by 27 February at the latest.

Social programme

6 March 2006

Cocktail reception and gala conference dinner Skinners Hall

Kindly supported by:

Bermuda International Insurance
Services Ltd

Social event ticket reservations cannot be guaranteed unless payment has been received by 28 February, subject to availability.

7 March 2006

Cocktail reception and awards Collyer~Bristow offices

Sponsored by:

Collyer~Bristow
AIB Jersey

Registration Form

11th Annual Conference
International Wealth Transfer Practice
Trust, tax, wealth and business planning for artists and sportspersons
The Landmark London, 6-7 March 2006

Please read the 'General Information' section before completing this form and return it together with your payment to Harriet Rowland at the address overleaf. (Please attach your business card or write in block capitals)

Name _____

Membership number (if applicable) _____

Date of birth _____

Firm/Company/Organisation _____

Address _____

Tel _____ Fax _____

E-mail _____

Name and country to be shown on badge, if not as above

Special dietary requirements

Registration form and fees received:	On or before 13 February	After 13 February	Amount payable
IBA member	£780	£880	£
Non member	£880	£980	£
Young Lawyers (Under 30 years)	£585	£980	£
Academics/Judges (Full time)	£585	£980	£
Corporate Counsel	£705	£980	£
Conference Dinner	Number of tickets _____ @ £70		£
Social function ticket reservations are subject to availability and cannot be guaranteed unless payment has been received before 28 February			
TOTAL AMOUNT PAYABLE			£

Full payment must be received in order to process your registration

Please note that registrations are not transferable

Join the IBA today and register for this Conference at the IBA member rate.
Please find the membership application form at www.ibanet.org

Continued overleaf

For office use only

Payment _____ Ref No _____ Banked _____

Underpayment _____ Overpayment _____ Processed _____

Payment

- I enclose a cheque/bank draft made payable to the IBA for the total amount payable.
- I have transferred to the IBA bank account the total amount payable and have attached a copy of the bank transfer details.
- Please charge the total amount due to my Visa / Mastercard / American Express. Other cards are not accepted.

Card number _____ Expiry date _____

Name of card holder _____

Signature _____ Date _____

Where did you first hear about this Conference?

- IBA CONFERENCE OTHER CONFERENCE DIRECT MAIL INTERNET ADVERTISEMENT
- E-MAIL EDITORIAL RECOMMENDATION OTHER

Please provide further details, quoting code (if applicable)

IBA listings are provided to third parties, are used for marketing purposes and are published on the internet and other internationally available networks and media. The IBA will treat your personal information with the utmost respect and in accordance with UK data privacy laws.

If you do not want your details to be passed on, please tick the box

Please send the completed form to:

Harriet Rowland

International Bar Association

10th Floor, 1 Stephen Street, London W1T 1AT, United Kingdom

tel: +44 (0)20 7691 6868 fax: +44 (0)20 7691 6545 fax: +44 (0)20 7691 6544

e-mail: harriet.rowland@int-bar.org website: www.ibanet.org

Accommodation Form

International Bar Association

11th Annual Conference

International Wealth Transfer Practice

Trust, tax, wealth and business planning for artists and sportspersons

The Landmark London, 6-7 March 2006

Name _____

Company _____

Address _____

Tel _____ Fax _____

E-mail _____

Single room / Double room: £195 per room per night

The rate excludes breakfast and VAT.

Please reserve:

Single room Double room

Arrival date _____ Departure date _____

Payment Details

To secure your booking the hotel requires one night's deposit per room.

Cancellation and no-show policy

Cancellations received before 24 hours prior to arrival will not incur a cancellation charge, cancellations received after this deadline will incur a cancellation charge.

Please charge my credit card: American Express Visa Mastercard

Card number _____ Expiry date _____

Name of card holder _____

Signed _____ Date _____

Please return to:

The Landmark London

222 Marylebone Road, London NW1 6JQ

tel: +44 (0)20 7631 8000 fax: +44 (0)20 7631 8080

e-mail: reservations@thelandmark.co.uk



About the International Bar Association the global voice of the legal profession

In its role as a dual membership organisation, comprising 20,000 individual lawyers and over 195 Bar Associations and Law Societies, the International Bar Association (IBA) influences the development of international law reform and shapes the future of the legal profession. Its Member Organisations cover all continents and include the American Bar Association, the German Federal Bar, the Japan Federation of Bar Associations, the Law Society of Zimbabwe and the Mexican Bar Association.

Grouped into two Divisions – the Legal Practice Division and the Public and Professional Interest Division – the Association covers all practice areas and professional interests. It provides members with access to leading experts and up-to-date information as well as top-level professional development and network-building opportunities through high quality publications and world-class Conferences.

The IBA's Bar Issues Commission provides its Member Organisations with substantive programmes and social activities in and between meetings and the IBA's Human Rights Institute works across the Association, helping to promote, protect and enforce human rights under a just rule of law, and to preserve the independence of the judiciary and the legal profession worldwide.

Individual Tax and Estate Planning, Wills, Trusts and Succession Committee

The Individual Tax and Estate Planning, Wills, Trusts and Succession Committee has over 500 members in 70 countries.

The Committee is concerned not only with what the law is but how it might develop in areas including: inheritance rights and succession rules; will-making, lifetime giving; trusts; creditor claims against trusts and estates; and regulatory compliance affecting trusts. These matters are studied not only in the context of a sole jurisdiction but also with cross-border and multijurisdictional implications.

The Committee presents programmes at Conferences, distributes Newsletters to members and organises the annual International Wealth Transfer Practice Conference.

Art, Cultural Institutions and Heritage Law Committee

The Art, Cultural Institutions and Heritage Law Committee is concerned with all aspects of law as it relates to art, artists, and cultural heritage in the broadest context. This extends from archaeology and the protection of ancient monuments to national heritage and public and private collections to the art trade and contemporary art. Art law is an interdisciplinary field involving tax (individual estates and charities), commercial transactions, intellectual property in all aspects and private and public international law.

With a membership encompassing more than 58 different countries and lawyers active in representing auction houses, museums, artists and their estates, collectors, galleries, governments in the protection of cultural heritage, and dealers in antiquities, the Committee is an ideal forum to encourage and facilitate communications among art lawyers and other legal professionals about issues concerning all aspects of the law relating to the art market, international transactions in works of art, cultural property laws and museums.

International Bar Association

10th Floor, 1 Stephen Street, London W1T 1AT, United Kingdom

Tel: +44 (0)20 7691 6868 Fax: (0)20 7691 6544 e-mail: member@int-bar.org website: www.ibanet.org



About the American Bar Association Section of International Law

The ABA Section of International Law's goal is to serve as the gateway to international practice for 450,000 members of the profession. It has long been the home of leading experts in international law, and it also serves as the network for those who practise in international settings. The Section provides reliable and expert knowledge and perspectives on cutting-edge international legal issues to satisfy the information needs of its members.

Furthermore, the Section is the leader in advocacy for international legal policy and the rule of law.

Membership in both the ABA and Section of International Law is open to US lawyers and also non-US lawyers. The Section of International Law's membership is very diverse. Fifty per cent of its members are lawyers in private practice. In addition, the Section has 1,500 in-house counsel, 800 US lawyers living abroad, and 1,250 non-US lawyers from 90 countries.

The Section provides its members with tools indispensable to international law practitioners, including (1) cutting-edge, expert programmes and publications; (2) complimentary subscriptions to *The International Lawyer* (a quarterly journal) and the *International Law News* (a quarterly newsletter); (3) global networking opportunities via 50+ committees, listserves, and programmes; and (4) leadership and advocacy opportunities, which impact international laws and shape ABA policy.

International Private Client Committee

Work on the Committee is concerned with cross-border inheritance, inter vivos gifts, offshore trusts and taxation. A major focus is placed on recent developments in cross-border planning.

American Bar Association

740 15th Street NW, Washington DC 20005, USA

Tel: +1 (202) 662 1660 Fax: +1 (202) 662 1669 www.abanet.org/intlaw