

International Tax - Issues for the Individual

2011 Conference for tax specialists

- Residence -
Where Are We Now?
- Offshore Trust Planning
- IHT: Double Tax Treaties
and Cross-Border
Enforcement
- Overseas Investments and
Asset Protection Planning
- HMRC Investigations



East Midlands

6 December 2011

Hilton National, Castle Donington



Full Day Conference £295

(including lunch) plus VAT per person

£50 for MembershipPLUS 25% Discount for Members



International Tax - Issues for the Individual

2011 Conference for tax specialists

6 December 2011 Hilton National, East Midlands

Our one day International Tax conference has been specially designed for tax specialists who require an in depth knowledge of current topical issues. All sessions will be presented by highly acclaimed speakers who will look at recent key changes together with other current issues and enable those attending to give the best possible advice to their clients.

9.30am

Welcome and Introduction by Conference Chairperson

9.35am

Residence - Where Are We Now?

Dr Timothy Lyons QC,
15 Old Square Tax Chambers

- Case law and statute
- Topical issues affecting non-residence
- Life after Gaines Cooper, Grace and other recent cases
- HMRC6
- Remittance rules and the latest position

11.00am

Coffee

11.15am

Offshore Trust Planning

Jo Summers, PWT Advice LLP

- New remittance rules
- Trusts and companies as relevant persons
- Gift recipients
- New "disguised remuneration" tax
- EBTs, EFRBs and offshore pensions
- Planning opportunities

12.15pm

IHT: Double Tax Treaties and Cross-Border Enforcement

Dr Timothy Lyons QC,
15 Old Square Tax Chambers

- The uses and limits of IHT treaties
- Recent developments in cross-border tax recovery
- New exchange of information and assistance regimes
- EU/USA implications
- What next in treaties?

1.00pm

Lunch

2.00pm

Overseas Investments and Asset Protection Planning

Laurence Lancaster, The Sovereign Group

- An overview of investing abroad and double tax treaty issues
- Current trends, recent developments and innovative planning
- An overview of structures and arrangements deployed for parents subsidiary planning and royalty routing
- Practical examples and case study illustrations regarding the use of compliant offshore solutions for onshore residents

3.00pm

Tea

3.20pm

HMRC Investigations

Gary Ashford, RSM Tenon

- Insight into HMRC attacks on residence and domicile
- Case selection
- Specialist offices
- New powers and penalties
- Offshore Disclosure Facility

4.20pm

Chairperson's closing comments

CPD Hours: 6



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Speakers

Gary Ashford

Gary is Head of Tax Risk, Disputes and Investigations at RSM Tenon. He is a former Inspector of Taxes and is Chairman of the Chartered Institute of Taxation's Management of Taxes Technical Sub Committee which is responsible for all investigation and administration matters for the CIOT. Gary is an eminent tax investigation speaker and is author of various publications including the chapter on serious tax investigations for Bloomsbury Publishing.

Laurence Lancaster

Laurence is a qualified barrister and legal consultant of The Sovereign Group. Laurence was called to the Bar in November 2006. He also qualified as an advocate of the Bar Free Representation Unit (FRU) and continued to gain work experience at leading chambers in the Midlands and the South West. Laurence joined Sovereign's Isle of Man office in 2008, before he transferred to the London office. Business development is one of his strengths but considerable time is deployed in providing in-house legal advice and legal consultancy to clients of different subsidiaries of The Sovereign Group.

Dr Timothy Lyons QC

Timothy advises trustees of high net wealth individuals and has recently been involved in a number of court applications relating to high value trusts. He is consulted on cross-border matters and is the General Editor of Capital Taxes and Estate Planning in Europe, a unique book dealing with both tax and general law. He is a member of the committee of STEP's Cross Border Group. In addition to his work for private clients he works extensively in EC law and tax, both direct tax and VAT/customs.

Jo Summers

Jo runs her own law firm, PWT Advice LLP, which acts as consultant to other professionals including accountants and tax consultants. She has many years' experience advising on personal taxation and estate planning for individuals, especially non-domiciled clients or people moving overseas. Jo frequently speaks at conferences in the UK and the US.

Venue & Timings

East Midlands

Hilton National, Junction 24, M1,
Derby Road, Castle Donington
East Midlands DE74 2YW
(Sat Nav DE74 2SL)
Tel: 01509 674000

6 December 2011 9.30am - 4.30pm

25% discount for Members

A 25% discount on the total price will be given to all firms who pay an annual subscription (based upon the size of their practice) to belong to a Mercia training group. This does not include firms who buy season tickets. For further information please contact Sarah Moore.

£50 for MembershipPLUS

If you have recently enrolled as a MembershipPLUS firm the cost of attending this conference is £50 plus VAT per place.

Booking Form

I would like to book places on the **International Tax - Issues for the Individual** conference in Castle Donington on 6 December 2011 as follows:

A total of _____ places @ £295	£	<input type="text"/>
Less 25% discount for Members*	£	<input type="text"/>
A total of _____ places @ £50 for MembershipPLUS	£	<input type="text"/>
Sub total	£	<input type="text"/>
Plus VAT at 20%	£	<input type="text"/>
TOTAL	£	<input type="text"/>

Contact name

Name of firm

Address

Postcode

Telephone

Email

Delegate Name(s)

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I enclose a cheque for £ _____ made payable to Mercia Group Limited

I would like to receive more information about Membership/MembershipPLUS

*CPD members - 25% discount vouchers will be allocated to these bookings, if appropriate, unless you indicate otherwise.

Confirmation: An email confirming your booking will be sent to our enrolment or main contact. Joining instructions will be sent by email 10 days before the date of the event you are booked on to. Cancellations: No refund will be made where cancellation is received less than 14 days before the date of the course. All other cancellations will be subject to a £25 administration charge. All cancellations must be in writing.



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For further details on this
conference please contact
Emily Bailey on 0116 258 1200



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