

in association with:



Gibraltar Association of
Compliance Officers



Global Tax Enforcement Conference

Wednesday, 25 March 2015, Sunborn Yacht Hotel, Gibraltar

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Speakers

Clarissa Balmaseda

Attaché, International Affairs, IRS-CI, American Embassy, London

Miriam Fisher

Partner, Latham & Watkins LLP, Washington, D.C., United States

Brian McManus

Partner, Latham & Watkins LLP, Washington, D.C., United States

Tom Maher

Tom Maher, Managing Partner, Dougherty Quinn (DQ), Isle of Man

Annemarie Hughes

Partner and Head of Trusts & Private Client, DQ, Isle of Man

Sinead O'Connor

Head of Regulatory & Compliance Services, DQ, Isle of Man

Fiona Fernie

Partner, Pinsent Masons LLP, London, United Kingdom

Reg Day

Director, Pinsent Masons LLP, London, United Kingdom

Samantha Barrass

Chief Executive Officer, Gibraltar Financial Services Commission

Paul Astengo

Senior Executive, Gibraltar Finance, HM Government of Gibraltar

Carlos Martins

Senior Associate Director, SG Hambros Bank (Gibraltar) Limited and Chairman of GACO

Chris White

Partner, Hassans, Gibraltar

EVENT SCHEDULE

Wednesday, 25 March 2015, Sunborn Yacht Hotel, Gibraltar

8:30-9:00 a.m.	Registration and Coffee
9:00-9:20 a.m.	Welcome and Opening Remarks Co-Chairs Brian McManus and Tom Maher Samantha Barrass , Chief Executive Officer, Gibraltar Financial Services Commission Paul Astengo , Senior Executive, Gibraltar Finance, HM Government of Gibraltar Carlos Martins , Senior Associate Director, SG Hambros Bank (Gibraltar) Limited and Chairman of GACO
9:20-10:00 a.m.	FATCA in Practice Part 1 Reminders of the key components of FATCA, discussion as to where businesses should be now in terms of preparations, practical challenges to be considered Brian McManus , Partner, Latham & Watkins LLP Sinead O'Connor , Head of Regulatory & Compliance Services, DQ Fiona Fernie , Partner, Pinsent Masons LLP Reg Day , Director, Pinsent Masons LLP
10:00-10:30 a.m.	FATCA in Practice Part 2 – Questions and Answers Session Panel to address questions from the floor Brian McManus , Partner, Latham & Watkins LLP Sinead O'Connor , Head of Regulatory & Compliance Services, DQ Fiona Fernie , Partner, Pinsent Masons LLP Reg Day , Director, Pinsent Masons LLP
10:30-11:00 a.m.	Coffee Break
11:00-12:30 p.m.	Global Tax Enforcement Landscape History, current developments globally including UK and US, investigative tools and techniques, position and approach of Gibraltar and other offshore jurisdictions Miriam Fisher , Partner, Latham & Watkins LLP Clarissa Balmaseda , Attaché, IRS – Criminal Investigation Tom Maher , Managing Partner, DQ Fiona Fernie , Partner, Pinsent Masons LLP Chris White , Partner, Hassans
12:30-1:45 p.m.	Lunch

EVENT SCHEDULE

1:45-2:45 p.m.	<p>Inside a Global Tax Investigation, Part I</p> <p>How to be prepared, how to react to information requests and dealing with client confidentiality duties, AML issues, challenging TIEA requests, your regulatory and fiduciary duties, liaising with Police, Tax Office and Regulator</p> <p>Brian McManus, Partner, Latham & Watkins LLP Annemarie Hughes, Partner, DQ Sinead O'Connor, Head of Regulatory & Compliance Services, DQ Chris White, Partner, Hassans</p>
2:45-3:45 p.m.	<p>Inside a Global Tax Investigation, Part II</p> <p>Global tax issues and how they impact Gibraltar businesses caught up in an investigation, getting paid, voluntary co-operation, preparing to be interviewed, self-preservation, immunity, different approaches of IRS and HMRC</p> <p>Brian McManus, Partner, Latham & Watkins LLP Clarissa Balmaseda, Attaché, IRS – Criminal Investigation Tom Maher, Managing Partner, DQ Fiona Fernie, Partner, Pinsent Masons LLP Reg Day, Director, Pinsent Masons LLP</p>
3:45-4:15 p.m.	<p>Coffee Break</p>
4:15-5:00 p.m.	<p>Future of Global Tax Enforcement and its Impact on Gibraltar</p> <p>What's next and why, comprehensive tax enforcement, what to expect from the IRS, HMRC and other tax authorities, Gibraltar's role, offshore's future, beneficial ownership register and Ed Milliband's plans for us all!</p> <p>Brian McManus, Partner, Latham & Watkins LLP Miriam Fisher, Partner, Latham & Watkins LLP Clarissa Balmaseda, Attaché, IRS – Criminal Investigation Tom Maher, Managing Partner, DQ Fiona Fernie, Partner, Pinsent Masons LLP Chris White, Partner, Hassans</p>
5:00-5:30 p.m.	<p>Questions and Closing</p>
5:30 - late	<p>Drinks Reception</p> <p>Sponsored by Dougherty Quinn, Latham & Watkins, the Gibraltar Association of Compliance Officers and the Gibraltar Funds & Investments Association</p>

EVENT INFORMATION

Why You Should Attend

The goal of this conference is to provide delegates with an understanding of how international governments pursue tax investigations, what best practices you can implement on a “going forward” basis and the implications of various strategies for handling and meeting the challenges of an investigation. The ultimate purpose is to demystify tax investigations and arm the delegate so that when an enforcement proceeding begins, a feeling of rational calmness will replace what otherwise would have been anxiety and a creeping sense of panic.

Most financial services industry executives would like to focus on one goal: expanding their business. That ambition usually contemplates offering new services and/or enlarging the business’ footprint across new borders. Executives are not expected to be steeped in the know-how and complexities of confronting an international tax investigation, and for the most part would prefer to avoid such matters. However, the reality is that the likelihood of having to encounter a global tax investigation is on the rise.

We are standing at the foot of an inexorable upward curve in global tax enforcement. With Gibraltar’s significant (and growing) number of TIEAs, the introduction of US and UK FATCA and a commitment to implementing the Common Reporting Standard, the number of global tax and criminal cross border investigations is going to rise significantly. Previously confidential information is now at the fingertips of most tax authorities and if you haven’t already received a TIEA request for disclosure or been involved in a tax investigation, then it is only a matter of time. A business can no longer choose the path of passive ignorance.

The conference will serve as a stimulating discussion in an open environment which will encourage delegates to think, learn, exchange views and network. Steered by pan-industry experts, the conference will offer valuable insights through panel discussions at which your questions can be answered, as well as at lunch and networking breaks, and a reception at the conclusion of the day’s panels.

What You Will Learn

Topics include:

- History and background of global tax enforcement
- Newly enacted information gathering regimes
- A walk-through of a tax investigation from a Gibraltar perspective
- A walk-through of a tax investigation from a US and UK perspective
- Practical steps you should take in meeting the challenges presented by global tax enforcement
- Strategic implications of varying approaches in responding to requests for information
- Whether to allow and how to prepare for interviews by investigators • considerations for producing documents to investigators
- Whether the client’s funds can be used to hire legal representation and important AML issues
- Reconciling your duties to the client with issues of “self-preservation” and regulatory duties

EVENT INFORMATION

Who Should Attend

This conference is aimed specifically at senior management, MLROs and compliance officers within financial services industries such as:

- Fiduciaries
- Banks
- Insurance Companies
- Fund and Investment Companies
- Accountants
- Lawyers

This conference will provide practical and commercially relevant guidance to financial services businesses dealing with international tax, fraud and criminal investigations involving their clients or related parties. We will provide background on global tax enforcement, as well as guidance on the best practices and strategies to adopt before and after you are contacted by foreign tax or criminal authorities. We aim to help you be ready to meet the challenges posed in this new era of heightened cross-border enforcement.

Speaker Biographies

Please [click here](#) for full details of the speakers' biographies and expertise.

Booking

Please see electronic booking form on next page.

Links

For further information on DQ, please visit www.dq.im

For further information on Latham & Watkins, please visit www.lw.com

For further information on GACO, please visit www.gaco.gi

For further information on GFIA, please visit www.gfia.gi