

2nd Annual Global Congress
**INTERNATIONAL TAX PLANNING
MONEY LAUNDERING
COMPLIANCE**

December 4 - 6, 2002
Fontainebleau Hilton Resort • Miami Beach, Florida

Presented by:

*Prof. William H. Byrnes, IV, St. Thomas University School of Law, Graduate International Taxation (LL.M) Program
Dr. Robert J. Munro, University of Florida College of Law, Center for International Financial Crimes Studies*

Special Features:

- **Nine Pre-Congress Workshops and Seminars: December 4, 2002.**
- **3 Simultaneous Conferences in 1 and over 80 Speakers from 19 countries.**
 - **Track I: Money Laundering, Compliance & Cyber-Sabotage**
 - **Track II: Offshore Tax Planning and Latin American Financial Centers**
 - **Track III: Corporate International Tax Planning**
- Simultaneous Interpretation Services from English to Spanish.
- Royal Society of Fellows (RSOF) membership, which offers University and Professional Certification as an Anti-Money Laundering and Compliance Fellow, available to bankers, compliance and trust officers, insurance agents, government agents and attorneys.

Special Highlights:

- US Senator Bob Graham: Author, "USA Patriot Act".
- Money Laundering Financing of the Al-Qaeda Terrorism by Dennis Lormel, FBI.
- The USA Patriot Act: Current Enforcement, Ongoing Investigations, Bankers and Tax Professionals' Criminal and Civil Responsibilities Under the Act.
- Detection Software to Prevent Cyber-Sabotage. Computer Forensics, Data Recovery & Financial Cryptography by Alan E. Brill, Kroll Inc.
- IRS' Presentation on Offshore and Onshore Tax Shelters.
- US, Europe and Latin America Cross Border Tax Planning.
- Update on Transfer Pricing Issues and Offshore R&D.
- The Handling of Suspicious Transactions. The Bank Secrecy Act.
- US Tax Treaty Planning with Europe and Latin America.
- Latin America and The Caribbean Anti-Money Laundering Efforts.

Diamond Sponsors:



World Compliance

SOVEREIGN

• Royal Society of Fellows (RSOF)

Collaborating Associations:

Prof. Peter Koveos, Syracuse University School of Management, Diamond Center for International Tax and Trade
The Bahamas Bar Association • The Caribbean Bar Association

Congress Official Carrier:

American Airlines

Michael L. Alberga, Attorney at Law, Myers & Alberga, Grand Cayman, Cayman Islands (Confirmed)

Fraser Allport, President and Founder, The Constellation Group LLP, Miami Beach, Florida, USA (Confirmed)

Robert Anthony, European Editor for Tax Analyst, Anthony & C., Nice, France (Confirmed)

Luis Arritola, Appeals Officer, Large and Midsize Business, Internal Revenue Services (IRS), Miami, Florida, USA (Confirmed)

William E. Baugh, Jr., Attorney at Law & CEO, Savannah Technologies, Savannah, Georgia, USA; Former Assistant Director, FBI, Washington, D.C., USA (Confirmed)

Tom Borders, Partner, McDermott, Will & Emery, Chicago, Illinois, USA (Invited)

Alan E. Brill, Senior Managing Director, Kroll Inc., New York, New York, USA (Confirmed)

Gordon Butler, Professor of Law, School of Law, St. Thomas University, Miami, Florida, USA (Confirmed)

William H. Byrnes, IV, Esq., Professor of Law and Director, Graduate International Taxation (LL.M.) Program, St. Thomas University, School of Law, Miami, Florida, USA (Confirmed)

Juan J. Calvo, Vice Chairman, Board of Venceramica; President, Asociación Latino Americana de Industriales (AILA), Director, Venezuelan Federation of Chambers of Commerce and Industry (FEDECAMARAS), Former President, Confederación Venezolana de Industriales (CONINDUSTRIA), Caracas, Venezuela (Confirmed)

Beckett G. Cantley, Professor of Law, School of Law, St. Thomas University, Miami, Florida, USA (Confirmed)

Dr. Trevor A. Carmichael, Q.C., Barrister, Chancery Chambers, Chancery House, Bridgetown, Barbados (Confirmed)

Thomas V. Cash, Executive Managing Director, Kroll Inc.; Former Head, Drug Enforcement Administration, Miami, Florida, USA (Confirmed)

Carlos F. Concepción, Esq., Concepción Rojas & Santos, LLP, Coral Gables, Florida, USA (Confirmed)

Eric Crutchley, President, Cayman Islands Bankers Association; President & Chief Executive, Cayman National, Grand Cayman, Cayman Islands (Confirmed)

Robert E. Culbertson, Partner, King & Spalding Law, Washington, D.C., USA (Confirmed)

Miles Dean, International Fiscal Services, London, Ltd., England, United Kingdom (Confirmed)

Simon Denton, Managing Director UK, Sovereign Group, London, England, United Kingdom (Confirmed)

Kithsiri "Lucky" DeSilva, Corporate Sector Investigator, New Zealand Revenue, Wellington, New Zealand (Confirmed)

Dorothy Diamond, Editor and Journalist, Overseas Press and Consultants, Hartsdale, New York; Professor of Law, Graduate International Taxation (LL.M.) Program, St. Thomas University, Miami, Florida, USA (Confirmed)

Walter Diamond, Editor and Chief Economist, Overseas Press and Consultants, United Nations Tax Treaty and Free Trade Zone Advisor, Hartsdale, New York; Professor of Law, Graduate International Taxation (LL.M.) Program, St. Thomas University, Miami, Florida, USA (Confirmed)

Fitz-Roy Drayton, Legal Judicial Advisor, Caribbean Anti-Money Laundering Programme, Trinidad (Confirmed)

J. Richard Duke, Attorney at Law, Duke Law Firm, P.C., Birmingham, Alabama, USA (Confirmed)

Dr. Michael J. Eula, Administrative Law Judge and Professor of History, El Camino College, Palos Verdes Estates, California, USA (Confirmed)

Ronald Evans, Partner, Baker & McKenzie, Caracas, Venezuela (Confirmed)

Victoria H. Figge, Partner (Socia) and Founder, BERG Associates (Latin America), Inc.; Former Head, Financial Intelligence Unit, Panama City, Panama (Confirmed)

Alan S. Fine, Attorney at Law and Managing Partner, Fine, Rasco and Martinez, LLP, Miami, Florida, USA (Confirmed)

Larry C. Fedro, Executive Director, School of Law, Tax Clinic, St. Thomas University, Miami, Florida; Manager of Appeals (Retired), Internal Revenue Service; Former National Coordinator, Tax Shelters, Atlanta, Georgia, USA (Confirmed)

Giovanni B. Ferrari F., Ex-President, Colon Free Zone Users Association, Panama City, Panama (Invited)

Antonio Fernández, Area Financial Manager, Division of Banking, Florida Department of Banking and Finance, Tallahassee, Florida, USA (Invited)

Ross Gaffney, Special Agent in Charge, Federal Bureau of Investigation (FBI), North Miami Beach, Florida, USA (Confirmed)

Marie-Marthe Gagnon, Former Senior Tax Policy Officer, Tax Treaties Section, Department of Finance, Canada; CGA, M. Fiscalite, LLM Candidate (STU, Miami), Nassau, The Bahamas (Confirmed)

Phillip G. Gay, Jr., Senior Vice President, Commercial Bank of Florida; President, Compliance Advisory Services, Miami, Florida, USA (Confirmed)

Jaime González-Bendiksen, Baker and McKenzie, Juárez, Chihuahua, México (Confirmed)

Ricardo González Orta, National Director, Deloitte & Touche, Mexico City, D.F., Mexico (Invited)

Claudia Gramaccia, Professor, American University of Rome, Rome, Italy (Confirmed)

Stephen Gray, Attorney, Shutts & Bowen, London, England, United Kingdom (Confirmed)

Jorge Guerrero, CEO, External Compliance Officer, Inc., Union City, New Jersey; President, National Money Transmitters Association, New York, New York, USA (Confirmed)

Joseph Guttentag, Deputy Assistant (Retired), U.S. Secretary of Treasury for International Tax Affairs, Washington, D.C., USA (Invited)

David Herzig, Attorney at Law and Partner, Herzig, Ledow & Bloink, Miami, Florida, USA (Confirmed)

Hal J. Hicks, Mayer, Brown, Rowe & Maw, Washington, D.C., USA (Confirmed)

S. Peter Horn, Ph.D., LLM Associate Professor, School of International Management, Ecole Nationale des Ponts et Chaussées, Paris, France (Confirmed)

Robert F. Hudson, Jr., Senior Tax Partner, Baker & McKenzie, Miami, Florida, USA (Confirmed)

J. Ifor Hughes, Assistant Financial Secretary, International Business, Bermuda Government, Hamilton, Bermuda (Invited)

Thomas Hunker, Executive Commander, North Miami Beach Police Department, North Miami Beach, Florida, USA (Confirmed)

Katherine L. Johnson, Director, Kroll Inc., Miami, Florida, USA (Confirmed)

Thomas M. Jones, Partner, McDermott Will & Emory, Chicago, Illinois, USA (Invited)

Joel J. Karp, Esq. and President, Karp and Genauer, P.A., Coral Gables, Florida, USA (Confirmed)

Adam M. Katz, Partner-Tax, PricewaterhouseCoopers LLP, New York, New York, USA (Confirmed)

Sheppard King, Partner, Greenberg Traurig, Miami, Florida, USA (Invited)

Denis A. Kleinfeld, Attorney at Law, The Kleinfeld Law Firm, Miami, Florida, USA (Confirmed)

Dr. Peter Koveos, Professor and Director, School of Management, Syracuse University, Diamond Center for International Tax and Trade, Syracuse, New York, USA (Confirmed)

Jules Kroll, Founder, Kroll Inc., Miami, Florida, USA (Invited)

Marshall Langer, Of Counsel, Shutts & Bowen, London, England, UK and Miami, Florida, USA; Trade and Investment Commissioner, Grenada (Confirmed)

Dennis Lormel, Section Chief, Financial Review Group, Federal Bureau of Investigations (FBI), Washington, D.C., USA (Confirmed)

Dr. Jorge Luciani-Gutiérrez, Attorney at Law and President, Escritorio Jurídico Luciani; Attorney at Law, Banco Mercantil de Venezuela; Advisor, Venezuelan Banking Association; Professor, School of Law, Andrés Bello Catholic University, Caracas, Venezuela (Confirmed)

Paulo Ludovici, Attorney at Law, Maisto E. Associates, Milan, Italy (Confirmed)

David Marchant, CEO, World Compliance; Publisher, Offshore Alert and InsideBermuda, Miami, Florida, USA (Confirmed)

Elizabeth R. Marchese, Senior Vice President and Director, Security and Loss Prevention, Union Planters Bank, Miami, Florida, USA (Confirmed)

The Hon. Alyson Maynard-Gibson, Minister of Financial Services and Investments, Nassau, The Bahamas (Invited)

Dr. Peter D. Maynard, Attorney at Law, Dr. Peter D. Maynard & Co., Nassau, The Bahamas (Confirmed)

Manny Mencia, Senior Vice President, International Business Development, Enterprise Florida Inc, Florida State Dept. of Commerce, Florida, USA (Confirmed)

Dr. Daniel J. Mitchell, Senior Fellow, The Heritage Foundation, Washington, D.C., USA (Confirmed)

Dirk Mohrmann, President, World Compliance, Miami, Florida, USA (Confirmed)

Dr. Gilbert NMO Morris, Executive Director, The Landfall Centre, Nassau, The Bahamas (Confirmed)

Dr. Robert J. Munro, Co-Director, Center for International Financial Crimes Studies, College of Law, University of Florida, Gainesville, Florida, USA (Confirmed)

Timothy J. Murphy, Partner, Shutts & Bowen; Chairman, International Law and Tax Practice Group, Miami, Florida, USA (Confirmed)

Dr. Jaime Ospina-Velasco, International Consultant; Counsel on Anti-Money Laundering Issues, Colombian Bankers Association; Founder Member, Specialized Firm on Anti-Money Laundering Program, Ospina & Consultores Asociados Ltda. and Bogotá and Skol, Ospina, Serna, Bogotá, C.F., Colombia (Confirmed)

Ana D. Penn, J.D., LL.M. International Banking, LL.M. Tax, CEO and Executive Director, International Business Law Services (IBLS), Irvine, California; Professor of Law, School of Law, St. Thomas University, Miami, Florida, USA (Confirmed)

John H. Poorman, Director of Corporate Security, City National Bank of Florida, Miami, Florida, USA (Confirmed)

Andrew Quinlan, President, Center for Freedom and Prosperity, Washington, D.C., USA (Confirmed)

William L. Richey, Attorney at Law, William L. Richey P.A., Miami, Florida, USA (Confirmed)

Rod Rodríguez, Director, Kroll Inc., Miami, Florida, USA (Confirmed)

Eugene Rostov, Baker & McKenzie, Caracas, Venezuela (Invited)

G. Philip Rutledge, Chief Counsel, Pennsylvania Securities Commission, Harrisburg, Pennsylvania, USA (Confirmed)

Dr. George L. Salis, LLB (Hons) MA, LL.M., PhD, Academic Dean-Lakeland, Programme Director, Dept. of Legal Studies, Keiser College-Lakeland, Florida, USA (Confirmed)

Eduardo Sampaio, Country Director, Kroll Inc., Sao Paulo, Sao Paulo, Brazil (Confirmed)

Ozzie Schindler, Partner, Baker & McKenzie, Miami, Florida, USA (Confirmed)

Corinna Schulze, Legal Officer, Electronic Commerce Unit, European Union Commission, Directorate-General Information Society, Brussels, Belgium (Confirmed)

Leonardo Scudere, Managing Director, Kroll Inc., Sao Paulo, Sao Paulo, Brazil (Confirmed)

George Summerfield, Attorney at Law, Stadheim and Gear, Chicago, Illinois, USA (Confirmed)

David Tilzer, AML Program Manager, IRS, New York, New York, USA (Confirmed)

Andrew M. Tiktin, Industry Counsel for Offshore Compliance, Large and Mid-Size Businesses, Internal Revenue Service, U.S. Treasury, Miami, Florida, USA (Confirmed)

Miguel Valdes, Managing Partner, Valdes, Machado & Associates, LLC; Ernst and Young, Chicago, Illinois, USA (Confirmed)

Rene Valks, Partner and Attorney at Law, Loyens & Volkmaars, Rotterdam, The Netherlands (Invited)

Clemente Vázquez-Bello, Esq., Partner, Gunster, Yoakley & Stewart, P.A.; Chairman, Security and Fraud Prevention Committee, Florida International Bankers Association (FIBA); Former Chairman, Legal Affairs Committee; Member of the Bank Secrecy Act Advisory Group, Financial Crimes Enforcement Network (FINCEN), Department of Treasury, Miami, Florida, USA (Confirmed)

Ruben Verdes, Managing Director, Kroll Inc., Miami, Florida, USA (Confirmed)

Karen M. Warfel, Technical Advisor for Offshore Compliance, Large and Midsize Operating Division, Internal Revenue Service, U.S. Treasury, Sarasota, Florida, USA (Confirmed)

Wendy C. Warren, CEO and Executive Director, The Bahamas Financial Services Board (BFSB), Nassau, The Bahamas (Invited)

Bruce Zagaris, Partner, Berliner Corcoran & Rowe, Washington, D.C., USA (Confirmed)

Track 1

MONEY LAUNDERING, COMPLIANCE & CYBER-SABOTAGE

Pre-Conference Workshops & Seminars

Wednesday, December 4, 2002

Chairperson: Dr. Robert J. Munro
(1:00 pm - 6:30 pm)

1:00 pm - 3:00 pm
Cyber-Sabotage, Computer Forensics, Data Recovery and Financial Cryptography

Alan E. Brill • William E. Baugh, Jr. • Leonardo Scudere

3:00 pm - 3:30 pm
Tea and Coffee Break

3:30 pm - 5:00 pm
Detection Software to Prevent Money Laundering and Cyber-Sabotage

Alan E. Brill • William E. Baugh, Jr. • Leonardo Scudere • Dirk Mohrmann

5:00 pm - 6:30 pm
Roundtable: Questions and Answers

6:30 pm
Workshops and Seminars End

Thomas V. Cash, Moderator • J. Richard Duke • Phillip G. Gay, Jr. • Clemente Vázquez-Bello • David Marchant

10:00 am - 10:30 am
Tea and Coffee Break

10:30 am - 11:30 am
The USA Patriot Act: Compliance Implications for Bankers

New due diligence standards and duties in correspondent and private banking. New stringent customer identification procedures. Revised BSA regulatory and examinations. Needed changes in anti-money laundering programs. Needed changes in written policies and procedures, internal controls, tools and training. What regulations are on the horizon?

Phillip G. Gay, Jr., Moderator • Ruben Verdes • Victoria H. Figge • Eric Crutchley

11:30 am - 12:30 pm
The Handling of Suspicious Transactions: Know Your Customer, Your Employee, Your Correspondent Bank and Agent

Eric Crutchley • Victoria H. Figge • Dr. Peter D. Maynard • Dr. Jaime Ospina-Velasco

2-Day Program

Thursday, December 5, 2002

7:00 am - 8:15 am
Registration and Continental Breakfast

Chairperson: Dr. Robert J. Munro
(8:30 am - 12:30 pm)

8:15 am - 8:30 am
Welcome Introduction

8:30 am - 10:00 am
Roundtable: Putting the Crooks Out of Business! The Financial War on Organized Crime and Terror. The Impact of the USA Patriot Act on Money Laundering, Terrorism, Banks, Funds Transfers and Civil Liberties Summary of Act. Penalty phase review for non-compliance. The new money laundering watch list. Our freedoms and civil liberties.

12:30 pm - 2:00 pm
Luncheon

Luncheon Speaker: US Senator Bob Graham*

Chairperson: Dr. Robert J. Munro
(2:00 pm - 6:15 pm)

2:00 pm - 3:00 pm
Intelligence Briefing on Money Laundering, Organized Crime, Cyber-Sabotage and Fraud in the Western Hemisphere: Update, Prevention and Remedies

Ross Gaffney, Moderator • Thomas V. Cash • Dennis Lormel

3:00 pm - 4:00 pm
The Current Threats to Banks and Other Financial Institutions from Fraud
International wire transfers frauds. Plastic frauds. Identity frauds. Documentary and trade frauds. Bank frauds.

Phillip G. Gay, Jr. • John H. Poorman • Elizabeth R. Marchese • Rod Rodríguez

4:00 pm - 4:30 pm
Tea & Coffee Break

4:30 pm - 5:15 pm
Roundtable: Anti-Money Laundering Efforts in Panama, Brazil, Venezuela and Colombia
Ms. Figge will present a comparison of key Latin Nations with the U.S. considering critical components of their anti-money laundering and anti-terrorism programs. The results will surprise you. A roundtable discussion will follow. Update on Brazil. Update on Venezuela.

Victoria H. Figge, Moderator • Eduardo Sampaio • Dr. Jorge Luciani-Gutiérrez • Katherine L. Johnson

5:15 pm - 6:15 pm
What the New Suspicious Activity Reporting Duties for Securities Broker-Dealers and Money Services Businesses Require?

Jorge Guerrero • G. Philip Rutledge • Katherine L. Johnson • David Tilzer

6:15 pm
Day One Adjournment

7:00 pm
Cocktail Reception & Hors D'oeuvres - Beachside

Friday, December 6, 2002

7:00 am - 8:15 am
Continental Breakfast

Chairperson: Dr. Robert J. Munro
(8:30 am - 12:30 pm)

8:15 am - 8:30 am
Welcome Introductions

8:30 am - 9:15 am
Staff Training in Compliance, Due Diligence, and Anti-Money Laundering

Phillip G. Gay, Jr. • Eric Crutchley • Ruben Verdes

9:15 am - 10:00 am
Recovering the Monies Across the Borders
William L. Richey • Alan S. Fine

10:00 am - 10:30 am
Tea and Coffee Break

10:30 am - 11:30 am
Update on the Current U.S. Law of Money Laundering and Forfeiture

Carlos F. Concepción, Moderator • Alan S. Fine • William L. Richey • Clemente Vázquez-Bello

11:30 am - 12:30 pm
Red Flags of Terrorism, Money Laundering, Tips for Security and Operational Personnel

Dennis Lormel • Ross Gaffney

12:30 pm - 2:00 pm
Luncheon

Luncheon Speaker: Jules Kroll, Founder, Kroll Inc.*

Chairperson: Dr. Robert J. Munro
(2:00 pm - 6:15 pm)

2:00 pm - 2:45 pm
Global Supervision and Compliance
Fitz-Roy Drayton • Dr. Trevor A. Carmichael • Dr. Peter D. Maynard • Dr. Michael J. Eula

2:45 pm - 3:15 pm
Update on Bank Security

Elizabeth R. Marchese • John H. Poorman

3:15 pm - 3:45 pm
Tea and Coffee Break

3:45 pm - 4:45 pm
Protecting the Financial Integrity of Banks and Other Financial Institutions

Thomas V. Cash, Moderator • Dr. Jaime Ospina-Velasco

4:45 pm - 5:15 pm
Intelligence Briefing on Money Laundering and Financial Crimes in South Florida and The Caribbean

Ross Gaffney • Thomas Hunker

5:15 pm - 6:15 pm
Roundtable: The USA Patriot Act, Forfeiture Abuses and Reforms, and Tax Harmonization or Competition: National Necessities or Has Big Brother Grown Too Big?

Andrew Quinlan, Moderator • Thomas V. Cash • Alan S. Fine • William L. Richey • Phillip G. Gay, Jr. • Dr. Daniel J. Mitchell • Dr. Gilbert NMO Morris

6:15 pm
The Royal Society of Fellows Annual Meeting

7:15 pm
Conference Adjournment

Track 2

OFFSHORE TAX PLANNING & LATIN AMERICAN FINANCIAL CENTERS

Pre-Conference Workshops & Seminars

Wednesday, December 4, 2002

Chairpersons: Walter and Dorothy Diamond
(1:00 pm - 6:30 pm)

1:00 pm - 3:00 pm

The OECD in 2003 - Where Does It Go From Here?
The US as an offshore jurisdiction - a comparison of six US state offshore regimes: Are these OECD compliant?

Walter Diamond • Kithsiri "Lucky" DeSilva • Joseph Guttentag*

3:00 pm - 3:30 pm

Tea and Coffee Break

3:30 pm - 5:00 pm

Tax Planning for Latin American Families
Structuring the US property holdings of the Latin American family. Structuring the Latin American family business - Comparison of estate tax rules. Structuring the Latin American family business - Comparison of income tax rules.

David Herzig • Sheppard King • Joel J. Karp

5:00 pm - 6:30 pm

Roundtable: Questions and Answers

6:30 pm

Workshops and Seminars End

8:30 am - 10:00 am

The Future for Caribbean Financial Centers
The Caribbean economic forecast for 2003.

Marshall Langer, Moderator • Walter Diamond • Michael L. Alberga • The Hon. Alyson Maynard-Gibson*

10:00 am - 10:30 am

Tea and Coffee Break

10:30 am - 12:30 am

Roundtable: Financial Services and the Future Relationship Between Florida and The Caribbean

Dr. Gilbert NMO Morris, Moderator • Wendy C. Warren* • Manny Mencia • Antonio Fernández* • Dr. Trevor A. Carmichael

12:30 pm - 2:00 pm

Luncheon

Luncheon Speaker: US Senator Bob Graham*

Chairperson: Larry C. Fedro

(2:00 pm - 4:00 pm)

2:00 pm - 4:00 pm

IRS' Presentation on Offshore and Onshore Tax Shelters

Updated on listed transaction - new Circular 230. Enforcement actions under new tax shelter rules.

Kithsiri "Lucky" DeSilva, Moderator • Karen M. Warfel • Luis Arritola • Andrew M. Tiktin • Stephen Gray

4:00 pm - 4:30 pm

Tea & Coffee Break

Chairperson: Kithsiri "Lucky" DeSilva

(4:30 pm - 6:15 pm)

4:30 pm - 6:15 pm

Roundtable: Tax Information Exchange Agreements: The OECD Model TIEA and Alternative Proposals - What is not Included in the Agreements and Should Be / What Targeted Jurisdictions Should Demand The procedural process of negotiating for targeted jurisdictions Alternative proposals - what the OECD left out? A revenue agent perspective.

2-Day Program

Thursday, December 5, 2002

7:00 am - 8:15 am

Registration and Continental Breakfast

Chairperson: Professor Gordon Butler

(8:30 am - 12:30 pm)

8:15 am - 8:30 am

Welcome Introduction

Marie-Marthe Gagnon, Moderator • Bruce Zagaris • J. Ifor Hughes* • Marshall Langer • Kithsiri “Lucky” DeSilva

6:15 pm
Day One Adjournment

7:00 pm
Cocktail Reception & Hors D’oeuvres - Beachside

Friday, December 6, 2002

7:00 am - 8:30 am
Continental Breakfast

Chairperson: Dr. Peter Koveos
(8:30 am - 12:30 pm)

8:30 am - 9:15 am
US Inward Immigration Update, Practical Experience with US-Domestic Expatriation: The US Virgin Islands, and Update on Programs for Obtaining Foreign Nationality and Residency
Update on the tax and immigration consequences of US expatriation by HNWI. Domestic expatriation - Why leave when you can stay...in the USVI? Inward US visa and immigration update.

Marshall Langer • Timothy J. Murphy

9:15 am - 10:00 am
Effective Strategies for Purchasing US Property and FIRPTA

Robert F. Hudson, Jr.

10:00 am - 10:30 am
Tea and Coffee Break

10:30 am - 12:30 pm
Tax Strategies Using Domesticating and Foreign Life Insurance and other Deferred Compensation Techniques
Death of the COLI? - 419 and 412 (i) Plans.

J. Richard Duke, Moderator • Fraser Allport • Miles Dean • Paulo Ludovici

12:30 pm - 2:00 pm
Luncheon

Luncheon Speaker: Jules Kroll, Founder, Kroll Inc.*

Chairperson: Professor Peter Koveos
(2:00 pm - 6:15 pm)

2:00 pm - 3:15 pm
Effect of US Bankruptcy Law Changes on Domestic Asset Protection Strategies and the Experience with Comparable Foreign Alternatives, Update on Foreign Asset Protection Jurisprudence

J. Richard Duke • Katherine L. Johnson • Dr. George L. Salis

3:15 pm - 3:45 pm
Tea and Coffee Break

3:45 pm - 6:15 pm
Advising the Cross-Border US-European Client
Update on UK, France, Italy, Germany, The Netherlands.

Simon Denton, Moderator • Paulo Ludovici • Miles Dean • Robert Anthony • Stephen Gray

6:15 pm
The Royal Society of Fellows Annual Meeting

7:15 pm
Conference Adjournment

* Invited

Congress offer:

- The chance to Network with Colleagues and Experts
- Live Audience Participation
- Simultaneous Interpretation Services from English to Spanish
- Social Program, including a Cocktail Reception
- Christmas Shopping in Miami, Florida

Track 3

CORPORATE INTERNATIONAL TAX PLANNING

Pre-Conference Workshops & Seminars

Wednesday, December 4, 2002

Chairperson: Dr. Peter Koveos
(1:00 pm - 6:30 pm)

1:00 pm - 3:00 pm

Cross-Border Investment between Latin American and the US

Update on freedom of movement of goods and services in Latin America. Structuring cross-border investment with Mexico. Structuring cross-border investment with Brazil. Using tax treaties to structure cross-border investment with Latin America.

Juan J. Calvo, Moderator • Ricardo González Orta* • Eugene Rostov* • Ronald Evans • Jaime González-Bendiksen • Miguel Valdes

3:00 pm - 3:30 pm

Tea and Coffee Break

3:30 pm - 5:00 pm

Currency Risk Management and Taxation
Currency risk management and transfer pricing.
Accounting for derivatives and hedging.

Prof. S. Peter Horn, Moderator • Adam M. Katz

5:00 pm - 6:30 pm

E-Commerce Tax Update and a Survey of Offshore Jurisdictions for Your Server and Data Storage
Taking E-business offshore. EU legislation.

Prof. Claudia Gramaccia • Ana D. Penn • Corinna Schulze.

Roundtable: Questions and Answers

6:30 pm

Workshops and Seminars End

2-Day Program

Thursday, December 5, 2002

7:00 am - 8:15 am

Registration and Continental Breakfast

Chairperson: Dorothy Diamond
(8:30 am - 12:30 pm)

8:15 am - 8:30 am

Welcome Introduction

8:30 am - 10:00 am

Update on Use of Tax Advantaged Financial Products with Latin America
Update on Brazil, Latin America and Mexico.

Juan J. Calvo, Moderator • Ricardo González Orta* • Eugene Rostov* • Ronald Evans

10:00 am - 10:30 am

Tea and Coffee Break

10:30 am - 12:30 am

Latin American and Caribbean Free Trade Zones and an Update on US Export Incentives (ETI and What's to Come)

The future of free trade zones and free trade agreements. Update on extra-territorial income and the ETI replacement export incentives regime. Panama's Latin perspective.

Walter Diamond, Moderator • Giovanni B. Ferrari F*

12:30 pm - 2:00 pm

Luncheon

Luncheon Speaker: US Senator Bob Graham*

Chairperson: Larry C. Fedro
(2:00 pm - 6:15 pm)

2:00 pm - 4:00 pm

IRS' Presentation on Offshore and Onshore Tax Shelters

Update on listed transactions - new Circular 230 - Enforcement actions under new tax shelter rules.

Kithsiki "Lucky" DeSilva, Moderator • Karen M. Warfel • Luis Arritola • Andrew M. Tiktin • Stephen Gray

4:00 pm - 4:30 pm
Tea & Coffee Break

4:30 pm - 5:15 pm
Foreign Captive Insurance

Thomas M. Jones*

5:15 pm - 6:15 pm
Transfer Pricing 2002 Update

Ricardo González Orta* • Adam M. Katz

6:15 pm
Day One Adjournment

7:00 pm
Cocktail Reception & Hors D'oeuvres - Beachside

Friday, December 6, 2002

7:00 am - 8:30 am
Continental Breakfast

Chairperson: S. Peter Horn
(8:30 am - 12:30 pm)

8:30 am - 10:00 am
IP Valuations in R&D Cost Sharing Arrangements,
and Inclusion of Stock Options Update

S. Peter Horn, Moderator • George Summerfield •
Corinna Schulze

10:00 am - 10:30 am
Tea and Coffee Break

10:30 am - 11:30 am
Update on Corporate Inversions: The Bermuda -
Barbados - USA Triangle
Corporate Governance: The Enron political story
that no-one has told; what corporate compliance
departments need to look for in their companies;
and would the fully implemented OECD Report
have mitigated Enron's situation?

Dorothy Diamond, Moderator • J. Ifor Hughes*

11:30 am - 12:30 pm
Update on European Union Tax and Repatriation of
Earnings to US. Holding Company Update

Paulo Ludovici, Moderator • Rene Valks*

12:30 pm - 2:00 pm
Luncheon

Luncheon Speaker: Jules Kroll, Founder, Kroll Inc.*

Chairperson: Professor Claudia Gramaccia
(2:00 pm - 6:15 pm)

2:00 pm - 3:15 pm
Update on US Inbound-Outbound Planning

Rene Valks, Moderator • Hal J. Hicks

3:15 pm - 3:45 pm
Tea and Coffee Break

3:45 pm - 5:00 pm
Update on Subpart F Planning Techniques

Rob E. Culbertson • Ozzie Schindler

5:00 pm - 6:15 pm
Update on Tax Treaties and Planning Opportunities

Marshall Langer, Moderator • Robert E. Culbertson •
Paulo Ludovici

6:15 pm
The Royal Society of Fellows Annual Meeting

7:15 pm
Conference Adjournment

* Invited

ADVANCE
REGISTRATION
IS
REQUIRED!

2nd Annual Track 3 Congress



Hotel Venue

Fontainebleau Hilton Resort
Miami Beach, Florida
4441 Collins Avenue • (305) 538-2000

We have reserved a block of rooms for our distinguished congress participants at the beautiful Fontainebleau Hilton Resort at a discounted rate starting at \$169 plus tax early bird reservations single/double occupancy per room night. Attendees arrange their own hotel accommodations. **Group Name:** Tax Money Laundering Congress. **Group Code:** TML. Please refer to the general information page for more details.

Located in Miami Beach, where tropical breezes meets the warm caress of Florida sunshine, you will find the relaxing splendor of Miami's most renowned landmark hotel, Fontainebleau Hilton Resort. Situated in the mist of 20 lush acres of tropical gardens overlooking the Atlantic Ocean, the resort accommodates housing for over 1,200 rooms and 60 suites. Since its construction in 1954, the Fontainebleau has been famous for its luxury and sophistication for movie stars, presidents, and jet setters. Enjoy the modern resort facilities with the style and service expected from a classic hotel. Close to the famous Ocean Drive, bars and discos, museums, shopping and sightseeing excitement of an international metropolis, but worlds apart in the tropical beauty of ocean, sand and endless sun, Miami Beach beckons with its perfect year 'round climate.



SOCIAL PROGRAM

We are planning a social program* for congress attendees, spouses or accompanying guests. Persons who would like to participate must register as a companion. Please contact us for details and registration information.

Evenings will be free for congress attendees for further discussions with fellow participants or to spend with family and friends. We are planning a list of social events to offer you for your evening entertainment. Please contact our offices.

Beach Cocktail Reception: All registered Congress delegates and companions are invited on Thursday evening December 5th after closing the first day opening sessions, an informal reception getting together will take place by the beach. Hors D'oeuvres, a toast and a Cash Bar will be available. All registered Congress delegates and companions are invited.

Further Details please contact us or visit our congress website at www.taxmoneylaundering.com. The chance to register for these social events will be given after we receive your registration for the Congress. Families and relatives will be welcome to all activities for an additional fee per person.

*Social program is subject to change, with the exception of the Cocktail Reception on Thursday, December 5th.

Congress:

The congress offers 3 simultaneous conferences in 1. Delegates can focus on one track or choose panels of their interest from all three tracks. It will also present over 80 speakers from 19 countries.

Payment:

Registration fee for the entire three-day program is \$1650, including the Pre Congress Workshops on Wednesday, December 4, 2002. The registration fee for the two-day program on Thursday, December 5th and Friday, December 6th is \$1450. These fees include conference sessions, presentations, course book and materials, breakfasts, luncheons, coffee/tea breaks and cocktail reception only for registered delegate. Conference registration fee does not include travel, transportation and hotel accommodation fees, or any other expenses incurred. Discounts are offered for government officials and full-time academics. Please make payments in U.S. dollars only. Method of Payment are as follows: a) **Credit Card:** Visa and MasterCard, b) **Check:** Payable to *Foundation for International Fiscal Studies, Ltd.* and drawn on a bank physically located in the U.S., c) **Wire Transfer:** Make payment to The Hong Kong and Shanghai Banking Corporation, 1 Queen's Road, Central, Hong Kong, Account #: HK500 573902; Swift Code #: HSBC HKH HH KH; Account Name: Foundation for International Fiscal Studies. Please fax copy of wire transfer receipt to our offices at 305 474 2469.

Hotel Reservations:

We have reserved a block of rooms for our distinguished congress delegates at the beautiful **Fontainebleau Hilton Resort** at an excellent daily discounted rate starting at \$169 plus tax early bird reservations single/double occupancy per room night; \$190 plus tax single/double occupancy late reservations; and \$210 plus tax for bay/ocean view rooms. Room block cut off date is November 4, 2002. Reservations made after this date are subject to availability and the discounted rate is not guarantee. The Resort is located at 4441 Collins Avenue, Miami Beach, Florida

Delegates arrange their own hotel accommodations. Please contact the reservations department at (305) 538-2000 or fax to (305) 673-5351, and mentioned the **Group Code:** TML or the **Group Name:** Tax Money Laundering Congress. Hotel cancellation policy is 7 days prior to arrival. We encourage people to make their hotel reservation as early as possible. You can also register online at www.fontainebleau.hilton.com, mentioning the group code.

Continuing Education Credit:

Delegates should expect to receive between 15 and 20 CPE and CLE credits hours.

Simultaneous Interpretation Services from English to Spanish:

Available if needed, please add \$150 per person to the conference registration fee.

Conference Registration Confirmation:

Please contact our offices at least 48 hours prior to the conference if you do not receive a registration confirmation letter before the congress. Please bring the letter to the event as proof of registration.

Cancellation, Refunds and Substitutions:

All cancellations must be received in writing by November 13, 2002 at our offices. Refunds will be issued less a non-refundable administrative fee of \$150. No refunds or credits will be honored for cancellation received after November 13, 2002. For substitutions of registered attendee, please contact our offices. If for any reason the congress is cancelled, the Foundation for International Fiscal Studies, Ltd. is not responsible for hotel, airfares or any other costs incurred by registrants.

Program and Speakers:

Speakers and program are subject to change or cancellation. Proper substitutions or additions will be made as a consideration to our distinguished delegation.

Visa Letter and Letter of Invitation:

If required, please contact our offices. Available only for persons registered for the conference.

Travel Discounts (Airfare):

American Airlines is the congress official carrier, who offers special discounted First Class, Business and Economy rates to all Miami routes. Economy reservations discounts: 10%-Before 60 days and 5%-Days prior to the event. First/Business Class discounts: 15%-Before 60 Days and 10%-Days prior to the event. Refer to Authorization #69D2AL. Please contact your travel agent for details. To qualify for the discount, you may specify that you are attending "St. Thomas International Tax Conference" or call American Airlines at 1-800-433-1790 in the US. You may also contact Ms. Florence Dolan, The Travel Agent, at Tel: (305) 251-0443, Fax: (305) 251-4592 or E-mail: thetravelagent@mindspring.com. Refer to the group name: "Tax Money Laundering Congress." Group rates available.

Sponsorship and Exhibitions:

If your company or institution is interested in sponsoring or exhibiting our congress, please contact Sonnya Roa at (305) 474-2465 or sroa@stu.edu.

Social Program:

Spouses or accompanying guests who would like to participate in the Congress Social Program must register for the events with the congress administration. Please contact us for details and spouse/guests social program registration information.

For further information, please contact us:

Sonnya Roa, Head of Conference, CPE/Graduate International Taxation (LL.M.) Program
St. Thomas University School of Law
Tel: (305) 474-2467 / 2465 • US Toll-free: (877) 301-4736 • Fax: (305) 474-2469 / 2437
E-mail: sroa@stu.edu / taxconference@stu.edu • <http://www.taxmoneylaundering.com>

2nd ANNUAL GLOBAL CONGRESS INTERNATIONAL TAX PLANNING, MONEY LAUNDERING & COMPLIANCE REGISTRATION FORM

December 4, 5 & 6, 2002 • Wednesday, Thursday & Friday • Fontainebleau Hilton Resort • Miami Beach, Florida

- Register me for both, the **Two Day Congress** and the **Special Pre-Congress Workshops** on December 4-6. Fee: **\$1650.**
- Register me for the **Two Day Congress** on December 5-6, at a fee of **\$1450.**
- Yes, I need Simultaneous Interpretation Services from English to Spanish: \$150.00 per person.** Number of persons _____ x \$150 = \$ _____
- I wish to become a member of the **Royal Society of Fellows.** An application and information will be sent.
- I have particular interest in attending panels from:
- Track I:** Money Laundering, Compliance & Cyber-Sabotage **Track III:** Corporate International Tax Planning
- Track II:** Offshore Tax Planning & Latin American Financial Centers **Panels from all three tracks**
- I wish to receive information for companion persons' social program.
- I cannot attend the Congress, but I wish to be informed of future congresses. Please add me to your mailing list.
- Please send me **Sponsorship and Exhibiting** information.

Government Officials and Full-Time Academics please contact us for special discounted rates.

Please use block letters

1. Name: _____ Last Name: _____
 Title: _____ Email: _____

2. Name: _____ Last Name: _____
 Title: _____ Email: _____

Company: _____
 Address: _____
 City/State: _____ Country: _____ Zip Code: _____
 Phone: _____ Fax: _____

Please Indicate the Method of Payment: Please make payment in U.S. dollars. **TOTAL AMOUNT: \$** _____

Debit my **Credit Card.** Please select: Visa MasterCard

Cardholder Name: _____ Expiration Date: _____
 Card Number: _____ Signature: _____

- Check** enclosed payable in U.S. dollars to: Foundation for International Fiscal Studies, Ltd. and drawn on a bank physically located in the U.S.
- Wire Transfer to:** The Hong Kong and Shanghai Banking Corporation, 1 Queen's Road, Central, Hong Kong. Account Name: Foundation for International Fiscal Studies, Ltd.; Account #: HK500 573902; Swift Code #: HSBC HKH HH KH. Please attach a copy of the wire transfer receipt.

ADVANCE REGISTRATION IS REQUIRED. All registration forms must be accompanied with full payment. The organizers will refuse admission if payment has not been received.

CANCELLATION: \$150. NO REFUNDS after November 13.

Registration fees include conference sessions, presentations, course book and materials, breakfast, luncheons, coffee/tea breaks and cocktail reception only for registered delegate.

5 easy ways to register (English/Spanish/Portuguese)

| | | | | |
|--|--------------------------------------|--|---|--|
| Call: (305) 474 2467 / 2465 U.S. Toll-Free (877) 301 4736 | Fax: (305) 474 2437 / 2469 | Mail: Sonnya Roa, Head of Conference, CPE/Graduate International Taxation (LL.M.) Program, St. Thomas University School of Law, 16400 N.W. 32nd Avenue, Miami, Florida 33054-6459 USA. | Website: www.taxmoneylaundering.com | E-mail: taxconference@stu.edu |
|--|--------------------------------------|--|---|--|

A Professional & Networking Opportunity for:
 Bankers, Compliance Officers, Trust Officers, Attorneys, Auditors, Accountants, Investors, Entrepreneurs, Risk & Loss Prevention Managers, Money Transmitters, Security Brokers, Insurance Agents, Tax Attorneys, Law Enforcement (or Government) Officers and Regulators, Casinos and Free Zones Officers, Bank & Computer Security Officers and Other Professionals

- Congress offers:**
- The chance to Network with Colleagues and Experts
 - Live Audience Participation
 - Simultaneous Interpretation Services from English to Spanish
 - Social Program, including a Cocktail Reception
 - Christmas Shopping in Miami, Florida