

Wealth Structuring: Trusts and Foundations in Czechia and abroad

10 November 2023, starting 09.00 a.m.

Braunův dům, Karlovo náměstí 671/24, 110 00 Praha 1



CLE credits will be awarded. No participation fee is charged.

The working language will be English with no interpretation.

Speakers

Štěpán Holub, Holubová advokáti, Czech Republic

Attorney-at-law (CZ), TEP, admitted to the bar in CZ, Managing partner of Holubová advokáti

Jürg P. Brinkmann, Allgemeines Treuunternehmen (ATU), Liechtenstein

Dr. iur. HSG (University St. Gallen), LL.M. (Tax), Head of Tax ATU Vaduz and CEO Merco Trustees AG Zurich

Alicea Castellanos, Global Taxes, LLC, USA

CEO and Founder of Global Taxes LLC. Alicea provides personalized U.S. tax advisory and compliance services to high net worth families and their advisors.

John Davies, Farrer & Co LLP, United Kingdom

Lawyer, Partner of Farrer & Co LLP, focused on family and divorce.

Ahmed Elnaggar, Elnaggar & Partners ADGM

Attorney-at-law (UAE), Founder of Elnaggar & Partners in UAE, focusing on Corporate Structures, Succession Planning, and Trust Services

Martin Gassner, First Advisory Group, Liechtenstein

Lawyer, Certified Liechtenstein Fiduciary Expert, Client Advisor

Stella Kammitzi, Raza Corporate Services Ltd, Cyprus

Lawyer, Trust Legal Advisor, TEP, Member of the Cyprus Bar Association, focusing on Corporate, Banking and Trust Law. Managing partner of Raza Corporate Services Ltd, Chairwoman of STEP Cyprus and one of the Deputy Chairperson of the STEP Europe Region.

Tomasz Krzywański, GWW, Poland

Attorney-at-law (PL), TEP, Partner at Private Client & Tax Team

James Turnbull, New Zealand

Enrolled barrister and solicitor of the High Court of New Zealand. TEP, Uplift.cz and PT Trustees Limited

Hansjörg Wehrle, Allgemeines Treuunternehmen (ATU), Liechtenstein

Lawyer (DE), Specialist in Tax Law (DE) LL.M. (International Taxation), Member of the Executive Committee, ATU

Thomas Zwiefelhofer, First Advisory Group, Liechtenstein

Dr. iur. (University St. Gallen), Dipl. Architect (ETH Zurich), Member of the Group Board First Advisory Group, Honorary Consul General of the Czech Republic in Liechtenstein, Deputy Prime Minister and Minister of Justice, Economy and Home Affairs (2013-2017)

Programme

08:30 hrs Registration and Coffee

09.00 hrs **Introduction**

Štěpán Holub, Holubová advokáti

Martin Maisner, vice-president, Czech Bar Association

Stella Kamnitsi, STEP Europe

Petr Jakubec, Chairman of Asociace pro podporu a rozvoj svěřenských fondů

09.15 hrs **Challenging Trusts / Foundations**

Cyprus and EU Trusts: By-Passing Heirship Provisions?

Stella Kamnitsi, Cyprus

Broken Trust: Settlements and Divorce

John Davies, Farrer & Co, UK

Challenging foundations in Liechtenstein

Hansjörg Wehrle, ATU, Liechtenstein

Discussion

10:15 hrs Coffee break 

10.35 hrs **Recognition of Trusts / Foundations abroad**

Recognition of Trusts and Foundations in UAE

Ahmed Elnaggar, Elnaggar & Partners ADGM, UAE

Recognition of Liechtenstein Trusts

Martin Gassner, First Advisory

Recognition of New Zealand Trusts

James Turnbull, Uplift.cz, New Zealand

Discussion

11:35 hrs

Coffee break 

11.45 hrs

Tax considerations of cross-border trusts/foundations

Tax: Non-US Trusts Having US Beneficiaries

Alicea Castellanos, Global Taxes, USA

Taxation of trusts & foundation in Poland: Landmark cases

Tomasz Krzywański, GWW, Poland

Differences in Taxation of Trusts and Foundations in a Liechtenstein Perspective

Jürg P. Brinkmann, ATU, Liechtenstein


Double Tax Treaty - Liechtenstein Czech Republic

Thomas Zwiefelhofer, First Advisory, Liechtenstein

12:45 hrs

Discussion

13:00 hrs

Optional Lunch – sponsored by  APRSF

The Czech Bar Association

The Czech Bar Association is the biggest legal professional organization in the Czech Republic. It is a self-governing organization performing public administration in the area of the Legal Profession and, as such, it protects and guarantees the quality of the provision of the legal services by lawyers.

There are 11'883 active lawyers registered in the Register of Lawyers of the Czech Bar Association as of 1 January 2019.

For more Information: www.cak.cz

The Society of Trust and Estate Practitioners (STEP)

STEP is the global professional association for practitioners who specialise in family inheritance and succession planning.

We work to improve public understanding of the issues families face in this area and promote education and high professional standards among our members.

STEP members help families plan for their futures, from drafting a will to advising on issues concerning international families, protection of the vulnerable, family businesses and philanthropic giving. Full STEP members, known as TEPs, are internationally recognised as experts in their field, with proven qualifications and experience.

For more Information: www.step.org

Holubová advokáti

Holubová advokáti has provided legal services to corporate clients, international families and successful individuals with their legal issues in the Czech Republic since 1991. The firm is particularly known for its expertise in travel business law, corporate, real estate transactions and professional liability cases. It is featured in various independent catalogues, such as Chambers and partners of Who's Who Legal, as a leading law firm in the Czech Republic for high net worth individuals and private clients. Holubová advokáti has access to an extensive network of international lawyers around the globe.

For more information: www.holubova.cz

Allgemeines Treuunternehmen (ATU)

Allgemeines Treuunternehmen (ATU) is one of Liechtenstein's first and leading trust companies with subsidiaries and offices in Hong Kong, Panama, Tortola and Zurich. The headquarters in Vaduz employ a total staff of 120. Worldwide, ATU group has a total of 180 employees. These professionals combine their exceptional qualifications and know-how with a high degree of experience in international trust management and company law.

For over 90 years, ATU has been providing its clients with advice and support with a view to regional and international trust and corporate services. Together with its clients, ATU develops solutions which are tailored to their personal circumstances.

ATU strongly identifies with the Principality's liberal economic policy, culture and tradition. At the same time, ATU is an outward-looking and modern company with access to business contacts in important financial centres through its well-established and extended network. This provides us with the necessary proximity to our clients, enabling us to understand their individual needs and to devise the right solutions for them.

Our services

- **Asset structuring and financial planning**
- **Family office**
- **International tax advice and tax planning**
- **Formation and administration of (holding) companies, foundations, trusts and other legal entities**
- **Accounting and auditing**
- **Processing of business transactions**
- **Asset management**
- **Asset management controlling**
- **Fund solutions**
- **Succession planning**
- **Legal advice**
- **International change of residency**
- **Advise on selection of a banking institution**

Our speakers

Hansjörg Wehrle, email: hansjoerg.wehrle@atu.li

Jürg P. Brinkmann, email: juerg.brinkmann@atu.li

For more information: www.atu.li

First Advisory Group

First Advisory Group is a leading independent financial services provider with offices in Geneva, Hong Kong, Singapore, Vaduz and Zurich. The group offers clients diverse and innovative wealth management services through a single platform. The Group has assets of over CHF 50 billion under administration.

Wealth management through the generations

First Advisory Group is positioned to deliver a dynamic combination of services, precisely tailored to client needs. Our asset and succession planning solutions are flexible and enduring, ensuring optimum asset protection and smooth transitions of wealth from generation-to-generation. As all the services derive from a single platform, First Advisory Group can guarantee a seamless and effective solution for our clients.

The Group has over 240 experienced employees working around the world to fulfil this commitment. With expertise backed by 60 years' experience and a diversity of external specialists, First Advisory Group offers an independent, one-stop and results focused advisory service for its clients' wealth management needs.

Financial services first hand

- **Fiduciary Services** | Structuring, succession planning, trust services
- **Legal Advice**
- **Tax Advice** | International tax advisory
- **Finance & Accounting**
- **Investment Controlling** | Consolidated risk, performance, cost control
- **Investment Advisory** | Asset advice, investment advice
- **Asset Management**
- **Insurance Advice & Brokerage**
- **Family Advisory** | Comprehensive advice for large-scale family assets
- **Corporate & Financial Data Services** | Back office services for financial **companies**
- **Art Advisory**
- **Relocation Services** | Serving 17 destination countries

For more Information: www.first.li

Asociace pro podporu a rozvoj svěřenských fondů (APRSF)

APRSF is a self-governing, voluntary, non-political and non-profit association founded for the purpose of supporting and developing trusts and the trust sector. It is an obligatory consultation body within the legislative procedure of the Ministry of Justice and Ministry of Finance with an important role in shaping new legislation.

Our mission and objectives

- Bring together experts in the field of trust funds
- Encourage the sharing of knowledge and experience relating to trusts and their administration
- Raise awareness of trusts and their proper usage
- Create a platform for professional communication between our members and the public
- Promote a high standard of quality and expertise among service providers, consultants and trust administrators
- Contribute to the continual improvement of trust law
- Represent the interests of our members both in the Czech Republic and internationally

Our long-term goals

- Create a fully developed Czech trustee industry
- Protect the stability of the legal and regulatory framework for trusts and trustees
- Achieve a high level of expertise and professionalism among service providers, consultants and administrators of trust funds
- Enforce a code of “best practice“

For more Information: www.aprsf.cz

Registration form

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- I would like to register for the seminar
- Yes, I would like to join the lunch after the seminar

Name/first name:

Company:

Function:

Address/postal code/city:

Phone/e-mail:

We kindly ask you to return this registration form by **31 October 2023** by e-mail to:
slovackova@cak.cz

Please note that only registered participants are allowed to attend this Seminar.

We very much look forward to welcoming you to our event!