The 3rd Annual STEP Pacific Rim Conference

Early Bird – Preliminary Program

Register early and pay only $795 (members and non-members)

This fee applies when you register and pay by April 1, 2010. Rates after April 1, 2010: STEP Members: $895 / Non-members: $995

To register, please visit **WWW.REGONLINE.COM/STEP2010**

Accredited for 10.75 hours of MCLE and CPA Continuing Education

The 3rd Annual STEP Pacific Rim Conference will focus on planning for United States citizens or United States resident individuals with assets located abroad, development of structures for individuals to hold personal residences abroad, investment in United States real estate by foreign persons, international enforcement initiatives and planning for multinational families and their businesses.

The conference will feature technical sessions, a panel on new developments, workshops on trust drafting and philanthropy, practical case studies (including a role play) dealing with both United States domestic and international issues, and a concurrent session on fundamentals of planning for United States investments by foreign persons.

Speakers include practitioners from the STEP U.S. Chapters, as well as speakers representing international jurisdictions such as Canada, Mexico, Channel Islands, India, Italy, the United Kingdom and others to be confirmed.

Panels will include two case studies illustrating typical two-country planning situations (e.g. United States-Mexico, United States-Canada, United States-India, United States-Japan and United States-United Kingdom).

This conference is co-sponsored by STEP Los Angeles, STEP San Francisco and STEP Seattle with the support of the Vancouver branch of STEP Canada. It will include a catered reception where delegates are encouraged to meet the speakers and network with fellow delegates.

Accommodations. STEP has reserved a block of rooms at Hotel Casa Del Mar, Santa Monica allocated on a first-come, first-served basis. You may reserve directly with the hotel (800) 898-6999. Please make reference to the "STEP Pacific Rim Conference."

For Membership Information
Los Angeles - contact Paul Sczudlo at paul@sczudlolegal.com
San Francisco - contact Kent Lawson at klawson@bpmllp.com
Seattle - contact Todd Beutler at beutlert@lanepowell.com

STEP Society of Trust and Estate Practitioners USA

The 3rd Annual STEP Pacific Rim Conference

Cross Border Estate Tax, Business and Investment Planning for High Net Worth Individuals, their Families and Businesses

Speakers

Program Chairs

Lawrence H. Heller, TEP Bryan Cave LLP, Santa Monica, California

William K. Norman, TEP Ord & Norman, Los Angeles, California

Kent Lawson, TEP Burr, Pilger & Mayer, San Francisco, California

Speakers/Panelists

John Ambrecht, TEP Ambrecht & Associates, Santa Barbara, California

Leigh-Alexandra Basha, TEP Holland & Knight LLP, McLean, Virginia

Daksha Baxi Khaitan & Co., Mumbai, India

David Berardo, TEP Di Mascio & Berardo, Los Angeles, California

Todd M. Beutler, TEP Lane Powell, PC, Seattle, Washington

Michael Cadesky, TEP Cadesky & Associates, Toronto, Canada

M. Katharine Davidson, TEP Holland & Knight LLP, Los Angeles, California

Michelle B. Graham, TEP Luce, Forward, Hamilton Scripps, LLP, San Diego, California

Stephanie Hathaway Moss Adams LLP, Bellingham, Washington

Charlotte Ito, TEP Fox Rothschild LLP, San Francisco, California

Christopher J. Lintott, TEP Penningtons Solicitors LLP, London

Conference program

May 6	DAY 1
8:15 – 8:30 am	**CONTINENTAL BREAKFAST**
8:30 – 8:40 am	**WELCOME AND INTRODUCTION** ***Lawrence H. Heller, STEP Los Angeles Branch Chair*** ***Kent Lawson, STEP San Francisco Branch Chair***
8:40 – 9:30 am	**PANEL 1** **INTERNATIONAL TAX ENFORCEMENT AND REPORTING - UPDATE** Recent developments of practical interest; Multilateral "soft initiatives" and "commitments"; What to expect from the new high net worth IRS audit group; Practical protocols for advisors, trustees and financial consultants to protect and minimize exposures to clients and themselves; Voluntary disclosures after 10/15/09; FBAR and other international tax and financial reporting forms; Amnesty and enforcement programs in other jurisdictions; Uncertain future of international private banking and international financial centers. ***PANEL CHAIR: WILLIAM K. NORMAN, STEP LOS ANGELES PROGRAM CHAIR (UNITED STATES)*** ***PANELISTS: KENT LAWSON (UNITED STATES), CHRISTOPHER LINTOTT (UNITED KINGDOM), MARCO ROSSI (ITALY), BRUCE ZAGARIS (UNITED STATES)***
9:35 – 10:30 am	**PANEL 2A – ADVANCED TOPICS IN FOREIGN INVESTMENT IN UNITED STATES REAL ESTATE** United States and home country considerations; Evaluation of alternative structures; Use of trusts, partnerships and LLCs; Financing arrangements; Liquidation and gain repatriation strategies; Treatment of rent-free use of real property held in trust or by a corporation; Balancing estate planning and income tax considerations; Compliance and reporting. ***PANEL CHAIR: M. KATHARINE DAVIDSON, STEP LOS ANGELES SECRETARY (UNITED STATES)*** ***PANELISTS: LEIGH-ALEXANDRA BASHA (UNITED STATES), CHRISTOPHER LINTOTT (UNITED KINGDOM), JAVIER PORTAS LEDESMA (MEXICO)***
	OR
	PANEL 2B – PRACTICAL INSIGHTS ON THE FUNDAMENTALS OF PLANNING FOR UNITED STATES INVESTMENTS BY FOREIGN PERSONS Residency determinations and advance day counting strategies; Selection of exempt portfolio investments for United States nonresident aliens; Vehicles for holding United States residential properties; Estate and gift tax basics for the nondomiciled alien working in the United States; Compliance and essential reporting forms for noncitizens. ***PANEL CHAIR: PAUL A. SCZUDLO, STEP LOS ANGELES MEMBERSHIP CHAIR (UNITED STATES)*** ***PANELISTS: CHARLOTTE ITO (UNITED STATES), STEPHANIE HATHAWAY (UNITED STATES), MARIA NÚÑEZ(UNITED STATES)***
10:30 – 11:00 am	**BREAK**
11:00 – 12:15 pm	**PANEL 3 – RIGHTS OF CREDITORS AGAINST INTERESTS IN TRUSTS, CIVIL LAW FOUNDATIONS AND LEGAL ENTITIES ORGANIZED AND ADMINISTERED IN SELECTED JURISDICTIONS (FOREIGN AND DOMESTIC) – INTERACTIVE PANEL** Discretionary trusts; Spendthrift trusts; Self-settled trusts; Charging orders against LLCs; Civil law foundations; Modular (tiered) structures; Post-mortem issues for the heirs to an asset protection structure; Using common sense and keeping it simple; Minimizing exposure for the advisor. ***PANEL CHAIR: WILLIAM K. NORMAN (UNITED STATES)*** ***PANELISTS: JEFFREY R. MATSEN (UNITED STATES), DAVID BERARDO (UNITED STATES)***
12:30 – 1:15 pm 1:15 – 1:45 pm	**LUNCH** **KEYNOTE SPEAKER – WHAT A YEAR!** ***LEIGH-ALEXANDRA BASHA (UNITED STATES)***
2:00 – 2:10 pm	**TWITTER Q AND A**
2:15 – 3:30 pm	**PANEL 4A – CROSS-BORDER TAX AND ESTATE PLANNING ACROSS THE PACIFIC (ASIA, THE UNITED STATES AND CANADA) – ANALYSIS OF CASE STUDY ILLUSTRATING TYPICAL TWO-COUNTRY PLANNING SITUATIONS** Coping with varying requirements for testamentary instruments and limits on testamentary freedom; Use of situs wills; Design of trusts (single generation skip and dynastic); Use of private trust companies; Efficacious use of a "third jurisdiction"; Tax and non-tax aspects of multigeneration planning for the Pan Pacific family; Incorporating Sharia law into trust documents. ***PANEL CO-CHAIRS: MICHELLE GRAHAM (UNITED STATES), LEIGH-ALEXANDRA BASHA (UNITED STATES)*** ***PANELISTS: DAKSHA BAXI (INDIA), IAN WORLAND, STEP CANADA SECRETARY (CANADA), CHARLOTTE ITO (UNITED STATES)***
	OR

Speakers/Panelists continued…

Jeffrey R. Matsen, TEP Bohm, Matsen, Kegel & Aguilera, LLP, Costa Mesa, California

Kim G C Moody, TEP Moodys LLP Tax Advisors, Calgary, Canada

Maria E. Núñez, TEP Nunez Law Group, APC , San Diego, California

Jane Peebles, TEP Karlin & Peebles, LLP, Beverly Hills, California

Javier Portas Ledesma Creel, García-Cuéllar, Aiza Y Enríquez , Mexico

Marco Rossi Marco Q. Rossi & Associati, New York, New York

Paul A. Sczudlo, TEP Law Offices of Paul A. Sczudlo, Los Angeles, California

Jonathan Speck, TEP Mourant du Feu & Jeune, St. Helier, Jersey

Debra Thomas, TEP TD Waterhouse Private Trust, Vancouver, Canada

Ian Worland, TEP Legacy Tax + Trust Lawyers, Vancouver, Canada

Bruce Zagaris, TEP Berliner Corcoran & Rowe, Washington D.C.

Barbara M. Zak Ord & Norman, Los Angeles, California

PROGRAM COMMITTEE

With special thanks to Lawrence H. Heller of Bryan Cave LLP, William K. Norman of Ord and Norman and Kent Lawson of Burr, Pilger & Mayer for producing the 2009 Pacific Rim Conference.

ABOUT THE ORGANIZERS

The Society of Trust and Estate Practitioners (STEP) is a unique professional body providing members

2:15 – 3:30 pm (continued)	**PANEL 4B – CROSS-BORDER TAX AND ESTATE PLANNING WITHIN NORTH AMERICA (UNITED STATES, CANADA AND MEXICO) – ANALYSIS OF COMMON FACT PATTERNS** Estate planning under the United States-Canada Income Tax Treaty; United States-owned Alberta or British Columbia unlimited companies; Planning under different and conflicting marital property regimes in North America; Role, if any, of Mexican black-listed jurisdictions; Use of United States-Mexico Income Tax Treaty; Use of situs wills; Use of a "designer jurisdiction" trust; Use of private trust companies. ***CO-CHAIRS: TODD M. BEUTLER, STEP SEATTLE BRANCH CHAIR (UNITED STATES) AND MICHAEL CADESKY (CANADA)*** ***PANELISTS: M. KATHARINE DAVIDSON (UNITED STATES), KIM G C MOODY (CANADA), JAVIER PORTAS LEDESMA (MEXICO)***
3:30 – 4:00 pm	**BREAK**
4:00 – 4:10 pm	**TWITTER Q AND A**
4:10 – 5:30 pm	**PANEL 5 – DEPARTURE PLANNING FROM SELECTED JURISDICTIONS: EXIT-PLANNING CONSIDERATIONS FOR INTENDING EXPATRIATES CURRENTLY RESIDING IN UNITED STATES, UNITED KINGDOM AND CANADA – ANALYSIS OF SELECTED FACT PATTERNS** United States and Canadian exit tax regimes; Domicile and residency issues; Use of tax treaties; Alternative residency and citizenship jurisdictions. ***PANEL CHAIR: LAWRENCE H. HELLER (UNITED STATES)*** ***PANELISTS: IAN WORLAND (CANADA), CHRISTOPHER LINTOTT (UNITED KINGDOM), JAVIER PORTAS LEDESMA (MEXICO)***
5:30 – 7:30 pm	**COCKTAIL RECEPTION**
	DINNER ON YOUR OWN IN SANTA MONICA
MAY 7	**DAY 2**
8:00 – 8:30 am	**BUFFET BREAKFAST**
8:30 – 8:40 am	**TWITTER Q AND A**
8:40 – 8:45 am	**SECOND-DAY OPENING COMMENTS** ***WILLIAM K. NORMAN, STEP LOS ANGELES PROGRAM CHAIR*** ***TODD M. BEUTLER, STEP SEATTLE BRANCH CHAIR***
8:45 – 10:10 am	**PANEL 6 – CROSS BORDER TRUST: LEGISLATIVE AND LITIGATION DEVELOPMENTS, AN INTERACTIVE PANEL** Review and practical commentary on recent tax and non-tax cases and legislation (both pending and proposed) of more than local interest. ***PANEL CHAIR: PAUL A. SCZUDLO (UNITED STATES)*** ***PANELISTS: JONATHAN SPECK (JERSEY), MARCO ROSSI (ITALY), BRUCE ZAGARIS (UNITED STATES), IAN WORLAND (CANADA)***
10:15 – 11:10 am	**PANEL 7A – WORKSHOP – DRAFTING TRUSTS UNDER THE LAWS OF JURISDICTIONS OTHER THAN THE DOMICILE OF THE SETTLOR(S)** Coping with potential marital property claims and forced heirship rights; Beneficiary incentives and anti-vice clauses; Selection of protectors and advisors; Provisions for change of place of administration and governing law; Drafting tax, spendthrift and no contest clauses; Parentage of children conceived by use of assisted reproductive technologies; gestational surrogacy and posthumous conception; Getting the boilerplate right; Minimizing the risk of sham trust challenges; Recognition of trusts in civil law jurisdictions; Selection of trustees and successors; Use of a private trust company; Intervivos and pour-over funding mechanisms; Conflicts and choice of law issues. ***PANEL CHAIR: DEBRA THOMAS (CANADA)*** ***PANELISTS: MICHELLE GRAHAM (UNITED STATES), MARCO ROSSI (ITALY), JONATHAN SPECK (JERSEY), CHARLOTTE ITO (UNITED STATES)***
	OR
	PANEL 7B – WORKSHOP – CROSS-BORDER AND MULTIJURISDICTIONAL PHILANTHROPIC PLANNING Planning and drafting considerations; Selection of jurisdiction of administration; Tax implications of cross-border giving for donors and beneficiaries; Non-tax issues: donor advised funds as an option, strategic alliances, proper mix of family and public support; Conflicts of law issues. ***PANEL CHAIRS: MARIA NÚÑEZ (UNITED STATES), KENT LAWSON (UNITED STATES)*** ***PANELISTS: JANE PEEBLES (UNITED STATES)***
11:10 – 11:30 am	**Break**
11:30 – 1:00 pm	**PANEL 8 – BUSINESS SUCCESSION PLANNING FOR THE FAMILY-OWNED CROSS-BORDER BUSINESS AND ITS MULTINATIONAL FAMILY OWNERS IN AN ERA OF TAX AND ECONOMIC UNCERTAINTY – A ROLE PLAY** Planning for multi-generational succession; Use of dynasty trusts; Valuation suppression planning under recent court cases; Tax efficient cash distribution patterns; Avoiding family wars and conflicts; Family meetings and family constitutions as tools in communication and dispute resolution; Prioritizing family and business goals; Exit strategies for

with a local, national and international learning and business network for its members, who are professionals specializing in trusts and estates, executorship, administration and related taxes. STEP has nearly 14,000 members worldwide, providing coverage of over 60 jurisdictions. For further information, visit www.step.org or email step@step.org.		family members. ***PANEL CHAIRS: LAWRENCE H. HELLER (UNITED STATES), CHRISTOPHER LINTOTT (UNITED KINGDOM)*** ***PANELISTS: JOHN AMBRECHT (UNITED STATES), DAKSHA BAXI (INDIA), MARCO ROSSI (ITALY)*** ***ROLE PLAYERS: WILLIAM K. NORMAN (UNITED STATES), BARBARA ZAK (UNITED STATES)***
	1:00 – 1:15 pm	**CLOSING REMARKS** ***LAWRENCE H. HELLER, STEP LOS ANGLES BRANCH CHAIR*** ***DEBRA THOMAS, STEP VANCOUVER BRANCH CHAIR***
		TWITTER Q AND A THROUGHOUT THE WEEKEND AND BEYOND ***UNHOSTED***

For ease, register online at www.regonline.com/step2010

THE 3RD ANNUAL STEP PACIFIC RIM CONFERENCE
MAY 6 & 7, 2010
HOTEL CASA DEL MAR, SANTA MONICA, CA

REGISTER ONLINE:
THE EASIEST WAY TO REGISTER FOR THIS CONFERENCE IS ONLINE, YOU CAN DO THIS BY GOING TO WWW.REGONLINE.COM/STEP2010

REGISTRATION METHODS

- Via Online: **www.regonline.com/step2010**
- Via Fax: please complete this page and fax to (310) 434-2053

Title: _____
First Name: _____
Surname: _____
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PLEASE NOTE: We may not be able to cater for any access/dietary requirements that are not made known to us at least 10 working days prior to the event.

PAYMENT METHODS

By Check:
Please issue a check payable to "Gainsborough Capital – Fiduciary" and mail it to Roxann Mehle, Bryan Cave LLP, 120 Broadway, Ste 300, Santa Monica, CA 90401.

By Credit Card:
We accept Visa, MasterCard, Discover, Diners Club and American Express

Name on card: _____

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Card start date: ___ ___ ___ ___ Expires: ___ ___ ___ ___

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Total Amount:: $ _____

Signature of card holder : _____

Date: _____

I Plan To Attend *(check one for each concurrent session)*

Thursday (9:35 – 10:30 am)
Panel 2A – Advance Topics in Foreign Investment in U.S. Real Estate ☐
Or
Panel 2B – Practical Insights on the Fundamentals of Planning for U.S. Investments by Foreign Persons ☐

Thursday (2:15 – 3:30 pm)
Panel 4A – Cross-Border Tax and Estate Planning Across the Pacific (Asia, the U.S. and Canada) – Analysis of Case Study Illustrating Typical Two-Country Planning Situations ☐
Or
Panel 4B – Cross-Border Tax and Estate Planning within North America (U.S., Canada and Mexico) – Analysis of Common Fact Patterns ☐

Friday (10:15 – 11:10 am)
Panel 7A – Workshop – Drafting Trusts Under the Laws of Jurisdictions Other Than the Domicile of the Settlor(s) ☐
Or
Panel 7B – Workshop – Cross-Border and Multijurisdictional Philanthropic Planning ☐

REGISTRATION FEE – please check corresponding box

Early Bird **US$795** ☐

This fee applies when you register and pay by April 1, 2010.

RATES AFTER APRIL 1, 2010

STEP Members **US$895** ☐

STEP Member No: _____

Non STEP Members **US$995** ☐

Non-members who become members of STEP USA within 30 days of the conference will receive a rebate of the member/non-member fee differential.

For Membership Information Contact
Los Angeles – Paul Sczudlo at paul@sczudlolegal.com
San Francisco – Kent Lawson at klawson@bpmllp.com
Seattle – Todd Beutler at beutlert@lanepowell.com

Hotel Accommodations

Preferential rates have been negotiated at Hotel Casa Del Mar, Santa Monica. These are available on a first-come first-served basis. To book, please call (800) 898-6999. Please make reference to "STEP Pacific Rim Conference".

CANCELLATIONS/SUBSTITUTIONS

Cancellations must be received in writing by April 20, 2010 and will be subject to an administration charge of $200. It is regretted that cancellations made after that time will not be accepted and the delegate will be liable for the full conference fee. Substitutions may be made at any time provided the organizers are notified prior to the conference. Please note that if a non-STEP member attends in lieu of a STEP member the difference in fees will be charged. Please contact Roxann M. Mehle by email Roxann.Mehle@bryancave.com with any cancellations or substitutions.

Terms and Conditions

Conference documentation (partially in convenient CD format) will be distributed at the event. STEP reserves the right to amend or cancel this course where the occasion necessitates. In such circumstances a full refund of any registration fee will be made but STEP shall accept no further liability. Prices may be subject to change. This booking form constitutes a legally binding contract. The delegate and firm are jointly and severally liable for payment of the fees due.

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