# SWISS & LIECHTENSTEIN STEP FEDERATION

**ALPINE CONFERENCE** 

MASTERING THE WAVE OF CHANGE igress Centre Kursaal Interlaken **31 JANUARY / 1 FEBRUARY 2018** 

MEDIA PARTNER

























THE WORLD IS NO SAFE HAVEN FOR WEALTH – BUT IT CAN BE UNDER CERTAIN CIRCUMSTANCES.



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# CONFERENCE WELCOME

Dear Members and Friends,

Welcome to our second Alpine conference. The response to our inaugural conference of last year was overwhelmingly positive, and we are absolutely delighted by the continued support from delegates and sponsors, enabling us to bring you this year's programme.

There have been many fundamental changes in our professional sphere in recent years, and there will be more to come. Instability and change have become the new normal. Our sessions are geared to help inform you by laying out and debating the issues involved, whilst highlighting the opportunities that our Region holds and how we may best use them.

With change comes instability, and it is essential that we are proactive and united in designing our own future within the changing landscape, both for ourselves as an industry, and for our clients.

One reason for the establishment of the Swiss & Liechtenstein STEP Federation was to enable us to represent a united point of view amongst the Member Branches on subjects that affect us all, and to foster closer communication with other professional associations. In the last twelve months' we have taken a seat with the newly formed Swiss Supervisory Organisation of Wealth Managers and Trustees so that we may add our voice to the discussion on the regulation of Trustees. The round table session on FINLA FINSA -The Impact of Licensing Asset Managers and Trustees will debate the best way of navigating some of those expected changes.

For our clients, we look to how we may help them plan their business and family matters, in a compliant manner within this age of uncertainty.

How though do we as advisors manage when things go wrong? When transparency is misused and client data is purloined, or when the client has withheld some critical information regarding his tax status? We hope to provide insight on how to handle such matters when we inadvertently find ourselves in a vulnerable and exposed position

To help us on our way, and to show us how from small things mighty results may grow, we are extremely honoured to have with us, Professor Hans Peter Beck, a leading scientist at CERN. Having reached for the stars last year, we are turning our gaze inwards to the fundamental fabric and the inner workings of the Universe. Professor Beck holds pivotal functions in the design, development, and construction of key elements of the ATLAS experiment. The developments and the learning that we have so far gained from this are far reaching indeed, and show us the way to achieving the unimaginable!

This event is for you. We welcome a respectful and interactive environment, and have established many areas where you may discuss and network with your peers to create ideas to build and move into the future.

#### **ORGANISING COMMITTEE**



**FELICITY KELLER**LLB (Hons), Barrister-at-Law, TEP, Co-Chair,
Swiss & Liechtenstein STEP Federation



**ANDREW McCALLUM**Partner,
Rawlinson and Hunter SA, Geneva

# **CONFERENCE PROGRAMME**



10:00 **REGISTRATION, BREAKFAST & NETWORKING** - Kindly sponsored by



#### 11:00 WELCOME FROM THE SWISS & LIECHTENSTEIN STEP FEDERATION

**FELICITY KELLER** 

- LLB (Hons), Barrister-at-Law, TEP, Managing Director, J. Stern & Co (Switzerland) AG and Co-Chair, Swiss & Liechtenstein STEP Federation

- Co-Chair, Swiss & Liechtenstein STEP Federation

#### 11:05 **WELCOME FROM STEP WORLDWIDE**

**CECILE CIVIALE-VUILLIER** 

#### 11:10 CHAIR'S OPENING REMARKS

**FELICITY KELLER** 

 LLB (Hons), Barrister-at-Law, TEP, Co-Chair Swiss & Liechtenstein STEP Federation

#### 11:15 **KEYNOTE ADDRESS - CERN**

**PROFESSOR HANS PETER BECK** 

Senior Scientist and a Research Team Leader, CERN; President of the Swiss Physical Society; Albert Einstein Centre for Fundamental Physics

### 11:45 THE CHANGING POLITICAL LANDSCAPE - EFFECTS ON EUROPE AND IN PARTICULAR CH/FL

- What are the biggest game changers now in regulation, succession and tax law in the EU, UK and CH/FL
- Effects of Brexit and independence desire of European regions
- Effects of current OECD and EU initiatives (BEPS, AiA/CRS)
- Germany after the election Vacuum in central Europe?

RICHARD FRIMSTON
HSH PRINCE MICHAEL
OF LIECHTENSTEIN
DR CHRISTIAN VON OERTZEN
DR ARIEL SERGIO GOEKMEN

- Partner, Russell-Cooke LLP
  - Chairman, Industrie- und Finanzkontor Ets, Wealth Preservation Experts
  - Partner, Flick Gocke Shaumburg
- Member of the Executive Board, Schroder & Co Bank AG (Moderator)

#### 13:00 **NETWORKING & REFRESHMENTS** - Kindly sponsored by



#### 14:15 FINIA FINSA – THE IMPACT OF LICENSING ASSET MANAGERS AND TRUSTEES IN SWITZERLAND

- The new Financial Services & Financial Institutions Act
- · The licensing and supervisory model
- Implications for asset managers in/operating from Switzerland



- New rules for Swiss trustees
- Trustee exemptions from FinIA
- What about single / multiple family offices?
- Transition period and rules
- Impact on organisation

FRANZ DE PLANTA - President of OAR-G, Organisme d'Autoregulation des Gerants de

patrimoine; Co-Chairman of SOWT, Swiss Supervisory Organisation of Wealth Managers and Trustees; Chairman of MANTOR SA (Geneva,

Lugano, Zurich) and MANTOR (UK) Ltd, London

**ALEXANDER RABIAN** - Partner, Streichenberg & Partner; Chairman of the SRO Board Swiss

Association of Asset Managers (SAAM)

**ALEXANDRE VON HEEREN** - Chairman of the Swiss Association of Trust Companies SATC, Chairman

of the Board of Directors, Mandaris Ltd

**DAVID WALLACE WILSON** - TEP M.C.J. (NYU), Partner, Schellenberg Wittmer Ltd (*Moderator*)

16:00 **NETWORKING & REFRESHMENTS** - Kindly sponsored by

SCHRODER & CO BANK AG

### **Schroders**

### 16:30 TRUSTS OWNING SWISS RESIDENTIAL AND COMMERCIAL PROPERTY

- The obstacle of Lex Koller for residential real estate
- Why Swiss real estate property and trusts represent a complex mix from a Swiss tax perspective?
- What are the differences between irrevocable/revocable and fixed/discretionary trusts?
- Which taxes apply and what are the issues?
- Practical examples

**DR DELPHINE PANNATIER KESSLER** - Partner, Etude Pannatier & Quinodoz SA

**DR JEAN-FREDERIC MARAIA** - Partner, Schellenberg Wittmer Ltd

**ANDREW MCCALLUM** - Partner, Rawlinson & Hunter SA (*Moderator*)

17:30 DAY ONE ROUND-UP

17:45 **SWISS & LIECHTENSTEIN STEP FEDERATION STUDENT AWARDS** 

18:30 DRINKS RECEPTION, SALON NAPOLEON, VICTORIA JUNGFRAU - Kindly sponsored by



The art of finance.

19:30 **GALA DINNER, SALLE DE VERSAILLES, VICTORIA JUNGFRAU** - Kindly sponsored by

SCHELLENBERG WITTMER



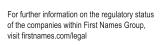
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# **CONFERENCE PROGRAMME**



### DAY 2 1 FEBRUARY 2018

08:00 **BREAKFAST & NETWORKING** - Kindly sponsored by

Baker McKenzie. Link

#### 08:55 **CHAIR'S OPENING REMARKS**

**CECILE CIVIALE-VUILLIER** 

- Co-Chair, Swiss & Liechtenstein STEP Federation

#### 09:00 INTERNATIONAL RECOGNITION OF CH & FL STRUCTURES

- Why Switzerland is attractive to set-up and run a foundation?
- What are the options structures given to donors in Switzerland while reflecting on their giving?
- What makes Switzerland particularly attractive for private donors?
- What are the prerequisites for tax exemption?
- Why are there hardly any family foundations in Switzerland?
- How are FL foundations treated in Switzerland (both charitable and family)?
- How foreign courts have pierced the veil of Liechtenstein foundations on public policy grounds (OLG Stuttgart and Düsseldorf), and how to avoid that in the future.
- The recognition of trusts by the EU Court of Justice and what trustees need to pay attention to in order to be able to invoke the freedom of establishment, or free movement of capital.
- In what context is it better to use trusts or foundations or nothing at all...?

ETIENNE EICHENBERGER DR JOHANNES GASSER DR NATALIE PETER

- Co-Founder and Managing Partner, WISE Philanthropy Advisors
- LL.M. Partner, Gasser Partner
- LL.M. TEP, Partner, Blum & Grob Attorneys

#### 10:00 WHEN CAN TRANSPARENCY GO WRONG? HOW WILL YOUR DATA BE USED?

- Swiss Principle of Specialty; how can its adherence be ensured? What will it take for an AEOI agreement to be suspended?
- Swiss Finish on adopting a "control mechanism" for certain AEOI agreements; what can be expected?
- Terms of reference on confidentiality by the OECD's Global Forum; are they failing taxpayers?
- What's the reality on the ground in LatAm, Russia and elsewhere?
- To what extent do data leaks, hacking, infiltrations matter?
- Company and Trust registers; not (yet) publicly accessible?
- Attempting to solve the problem of tax evasion but creating multiple more serious problems, including human rights violations?

DR HANS-JOACHIM JAEGER KLEMENS R ZELLER TATIANA MENSHENINA

- Partner, EY
- Executive Director, Wealth Advisor, J.P. Morgan, Geneva
- Partner, Withers LLP

# **CONFERENCE PROGRAMME**



[10 hours CPD]

### 11:00 **NETWORKING & REFRESHMENTS** - Kindly sponsored by



#### 11:30 TAX REGULARISATION IN 2018

- Is it too late anyway for tax regularisation now that CRS data exchange is here? If you have not declared, what can you do, if anything.
- The historic bank data that can be obtained by tax authorities and what to expect when they have it.
- How to negotiate.
- What if your client has lied to you?

#### **JUERG BIRRI**

- Partner/Head of Legal, Switzerland, Global Head of Legal, KPMG

STEPHANE DE LASSUS GERD KOSTRZEWA RICHARD MORLEY Partner, Charles Russell SpeechlysPartner, Heuking Kuehn Luer Wojtek

- Partner, BDO LLP

### 12:30 LUNCH & NETWORKING

#### 13:40 CHAIR'S OPENING REMARKS

### **ANDREW McCALLUM**

- Partner, Rawlinson and Hunter SA, Geneva

### 13:45 **DIGITAL LEGACY**

- What are digital assets, who "owns" them and how can they be passed on to heirs (if at all)?
- Financial assets such as PayPal accounts, virtual bank accounts, online gaming accounts, bitcoin.
- Social media accounts and websites.
- E-books/audio-books.
- Music and movies.
- Photos or personal movies stored in the cloud.
- Planning considerations for loss of capacity and death.

### PATRICK SCHMUTZ NICOLAS CAPT

- Attorney-at-Law, Vallucci & Schmutz AG
- Attorney-at-Law (Geneva and Paris), CAPT & WYSS Attorneys

#### 14:30 HELP, GET ME OUT OF HERE! CHOICE OF CITIZENSHIP?

- Conceptual framework: Foreign investment vs. residence planning vs. citizenship planning.
- Why has citizenship planning become so relevant?
- Why move out? What are the most relevant triggers?
- What countries offer the most interesting residence-by-investment options?
- Latest trends in residence and citizenship planning.
- Risks of non-recognition? Requirement for "effective citizenship"? Multi-citizenship issues.
- Meaning and significance of the concept of citizenship in the 21st century.



JAMES CORBETT QC
DR GUILLAUME GRISEL

- LL.M. (Exeter), TEP Senior Counsel, Kobre & Kim (UK) LLP
- LL.M. (Cambridge), Ph.D., TEP Partner, Bonnard Lawson. Committee Secretary to the Swiss & Liechtenstein STEP Federation, Chairman of

STEP Lausanne

**DR PETER KRUMMENACHER** 

- Partner, Henley & Partners Switzerland AG

15:15 **NETWORKING & REFRESHMENTS** - Kindly sponsored by



### 15:45 **GREAT DEBATE - HOW TO PLAN IN UNCERTAINTY?**

- What are the new challenges?
- What will be the expectations of generation Y and Z clients?
- What will be the profile of the adviser in 10 years' time?
- From KYC to UYC?
- Will Switzerland remain a premier wealth management jurisdiction?
- Do Swiss service providers need to change?
- Will life assurance, foundations or other structures eclipse trusts?
- Should clients use service providers or product providers (whether automated or not!)?

MARK BARMES
LYUBOMIR GEORGIEV
CHARLES GOTHARD
CHRISTIAN ROCKSTROH

- Partner, Lenz & Staehelin
- Partner, Baker McKenzie Zurich
- Partner, Macfarlanes LLP
- Partner, swisspartners

### 16:45 **CONCLUSION & CLOSING REMARKS**



### **KEYNOTE SPEAKER PROFESSOR HANS PETER BECK**

President of the Swiss Physical Society Albert Einstein Center for Fundamental Physics, University of Bern

Professor Beck is a senior and long-time member at CERN's Large Hadron Collider where he played and plays major roles in the LHC's largest experiments - ATLAS. In 2012 he was a lead scientist in finding the long sought Higgs particle – one of the programme's most important breakthroughs. The discovery resulted in François Englert and Peter Higgs, the originators of the theory dating back to 1964, being awarded the 2013 Nobel Prize in physics, the year after the discovery was made. On the day of their Nobel presentation in Stockholm, Professor Beck gave the speech detailing the discovery's background and significance to a worldwide audience at the Noble Symposium, University of Oslo. Having developed his expertise in physics, mathematics, and astronomy at the University of Zurich, he studied for his PhD at Hamburg, Germany. From there he joined the University of Bern physics, and is the founder of the International Particle Physics

Outreach Group (IPPOG), as an international collaboration incorporating 28 countries, six major experiments world wide, and CERN. In September 2017, he was elected president of the Swiss Physical Society, uniting physicists from university, schools, research, development and industry, promoting the scientific exchange of ideas in Switzerland and with its international environment. Hans Peter Beck's boundless enthusiasm and desire to inspire the world about his subject and the importance of the work undertaken at CERN led to the Agora project 'Interactions' (http://particlephysics.ch) that he initiated and got founded via the Swiss National Foundation, the States Secretary of Research and Innovation, and the Swiss Academy for Natural Sciences. Under his leadership this project engages with high-school students, industry, and the general public as a whole. Its mission mirrors that of Professor Beck himself: 'to make their fascinating research understandable to the interested public and to debate its meaning for our society together with representatives of



### **MARK BARMES**

Partner Lenz & Staehelin

Mark Barmes advises individuals and trustees in all aspects of wealth planning. He regularly advises in both international and domestic contexts, particularly assisting foreign private clients and trustees to establish themselves in Switzerland and to resolve disagreements.

Mark Barmes is on the board of Swiss trustee companies and contributes actively in the field of wealth planning in Switzerland through membership and lecturing for STEP (Society of Trust and Estate Practitioners) and as a committee member of the Swiss Association of Trust Companies (SATC).



### **JUERG BIRRI**

Partner/Head of Legal Switzerland, Global Head of Legal, KPMG

Juerg Birri is a Partner at KPMG in Switzerland and heads the firm's legal department advising clients on a wide range of tax and regulatory issues. His expertise is advising on the transformation process from the traditional offshore to onshore banking models. In addition, Juerg holds the role of KPMG's global head of legal.

He also advises wealthy individuals with respect to almost all legal and tax matters. This includes the analysis of financial products from a tax and legal point of view and advising on the tax-efficient structuring of assets. His role also includes coordinating family office services in large entrepreneurial family structures across the globe.



**NICOLAS CAPT** 

Attorney-at-law (Geneva and Paris), CAPT & WYSS Attorneys

A founding partner of the firm CAPT & WYSS in Geneva in 2012, Nicolas has since developed a flourishing practice in all legal issues relating to information technology and the media in general, whether on an advisory or dispute resolution basis. Registered at the Paris Bar (UE lawyers list), he also acts in France on behalf of his clients. He has in particular developed a specialisation in the area of online reputations (right to be forgotten, identity theft, defence of online presence) and the management thereof, providing these services to institutions, companies and to those private individuals who are particularly liable to be exposed to such issues.

Nicolas Capt regularly speaks at conferences, both in Switzerland and across the globe, on the law governing the media and new technologies; he is often invited to appear in the broadcast media and is regularly published in relation with all these areas of legal expertise.



JAMES CORBETT QC LLM (EXETER) TEP

Senior Counsel, Kobre Kim (UK) LLP

James Corbett QC LLM (Exeter) TEP is an English barrister specializing in international litigation and arbitration. His areas of expertise include offshore trusts and estates, commercial disputes, company law and insolvency, land and intellectual property.

He appears regularly in British Commonwealth courts and has been admitted to the Bars of England, the Cayman Islands, the BVI, The Bahamas, Anguilla, Gibraltar and many others. He is a Chartered Arbitrator and commercial mediator.

He has published extensively on asset tracing and cross-border judgment enforcement. He is resident principally in the United Kingdom but spends much of his time in the Cayman Islands.



CECILE CIVIALE-VUILLIER

Co-Chair Swiss & Liechtenstein STEP Federation

Cecile has enjoyed a varied career working with small and large trust companies alike, earning a solid reputation for her work on international trust and foundation administration/corporate services.

Cecile worked in the UK and France before relocating to Switzerland heading up a trust company. She is a member of several significant professional bodies; The International Tax Planning Association, Association of International Business Lawyers. She is currently Chairwoman of the Swiss & Liechtenstein STEP Federation and will also be acting as a judge for the 2018 WealthBriefing Swiss Awards.

Cecile has qualifications in company law and practice, international trust management, trust administration and accounts, and trust creation.



**STEPHANE DE LASSUS** 

Partner Charles Russell Speechlys

Stephane de Lassus advises family and private groups, company directors and managers on LBO transactions. He is also a lecturer in international tax law at the University of Paris IX Dauphine as part of the Master of "Professional Assets Law" programme.

Stephane began his career as a tax specialist at Archibald Andersen in 1995, where he managed the asset management and family business department. He joined Landwell in 2002 and, in 2005, participated in the creation of STC Partners where he became a partner. Stephane joined Speechly Bircham in 2013.

A graduate of the Institut d'Etudes Politiques of Paris, he holds a Master's degree in Business Law (Universite Paris II –Pantheon Assas) and a DESS in taxation (Universite Paris IX Dauphine).

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### **FRANZ DE PLANTA**

President of OAR-G, Co-Chairman of SOWT, Chairman MANTOR SA and MANTOR UK

Franz R. de Planta has 33 years experience in banking, high net-worth financial services and family office, specialising in portfolio management and wealth management solutions. For 20 years he has been Chairman of de Planta & Cie, his private family office and financial company and since 2013 of MANTOR (www.mantor.ch), an asset management, integration and service company for independent asset managers and their clients. Since 2003 Franz has been chairman of OAR-G, a self-regulatory organisation for asset managers, family offices and trust companies, as their supervisory body by delegation of the FINMA, the Swiss Financial Market Supervisory Authority. Together with STEP, SATC and SAAM, the OAR-G has co-founded SOWT, the Swiss Supervisory Organisation of Wealth Managers and Trustees in Bern, co-chaired by Franz. He is member of economiesuisse (Swiss Business Federation), their legal committee and working group on the regulation of the financial sector, as well as the financial market policy forum of State Secretariat for International Matters.



#### RICHARD FRIMSTON BSC ARCS TEP CTAPS

Partner Russell-Cooke LLP

Richard is a partner and head of the Russell-Cooke LLP private client group in London and his areas of expertise include cross-border estates and private international law. He is chair of STEP EU committee and co-chair of STEP public policy committee and a member of various professional bodies including ELI, BIICL and TIAETL.

Richard is co-author of a work on the EU succession regulation by Sellier in English and German and one by OUP on the international protection of adults and Hague 35.



#### ETIENNE EICHENBERGER

Co-Founder and Managing Partner WISE – Philanthropy Advisors

Co-founder and WISE's managing partner, Etienne is an expert in high impact philanthropy as he has been working directly with families and foundations across Europe and some emerging countries, elaborating their strategy and realizing their projects.

Before creating WISE, he collaborated with the Foundation Avina for the social entrepreneurship, supported the development of the Schwab Foundation and worked for the Swiss Development Cooperation. He also is the co-founder of Sustainable Finance Geneva.

Today, he serves as the chairman of the Swiss Philanthropy Foundation, as an expert in philanthropy for the Family Firm Institute and as a member of the advisory board of the Debiopharm Chair on Family Philanthropy in the IMD.



### **JOHANNES GASSER LL.M.**

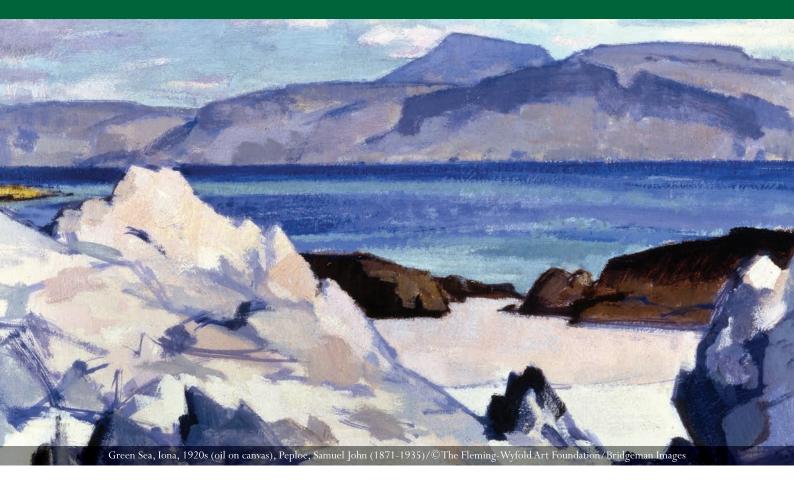
We will be the

Managing Partner GASSER PARTNER Rechtsanwalte

Dr Johannes Gasser is managing partner of GASSER PARTNER Rechtsanwälte, formerly Batliner Gasser, one of the leading law firms in Liechtenstein and a Chambers Global top tier firm, which was established in 1954. Dr Gasser is ranked by Chambers Global as a "leading individual" in Liechtenstein. He has been admitted to the Liechtenstein and Austrian Bar and specializes in challenging and defending Liechtenstein foundations and trusts in international and cross border litigation and arbitration. In recent cases, he has handled complex litigation on trust matters involving trustee removals and liabilities. Dr Gasser is a frequent speaker at the Liechtenstein University on foundation and trust law issues, legal expert witness in UK and other courts on Liechtenstein law, a member of the Judiciary Selection Panel by appointment of H.H. the Prince of Liechtenstein, a member (Trust Estate Practitioner) of the Society of Trust and Estate Practitioners (STEP), chairman of the Liechtenstein Arbitration Association (www.lis.li) and member of the board of the Liechtenstein Trustees Association (www.thk.li).



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LYUBOMIR (LUBO)
GEORGIEV

Partner
Baker McKenzie Zurich

Lyubomir Georgiev has practiced law since 2003 in US and in Switzerland and has assisted banks, insurance companies, fiduciaries, and high net worth individuals with their US, UK, Swiss and other legal questions in various jurisdictions in Liechtenstein, the European Union and globally. Lyubomir participated in the negotiations of the special arrangements between the Government of the Principality of Liechtenstein and the UK tax authority HMRC on voluntary disclosure under the Liechtenstein Disclosure Facility (LDF), tax compliance certification and tax information exchange under the bilateral agreement. He heads the firm's wealth management knowledge management & training in Europe, Middle East & Africa (EMEA) as well as the US Tax and Wealth Management practice in Zurich and the US Tax practice in Geneva. Previously Lyubomir has been a member of the EMEA Wealth Management Steering Committee and has worked in Washington, DC and New York. He is admitted to practice in Washington, DC; US Tax Court; England and Wales; and Switzerland as a foreign-qualified solicitor.



**CHARLES GOTHARD** 

Partner Macfarlanes LLP

Charles is a private client lawyer at Macfarlanes LLP and co-heads the firm's family office group. He specialises in advising international families and entrepreneurs as well as the family offices, trust companies and other institutions helping them. His work often relates to their estate planning, structures (whether trusts, foundations or other vehicles), philanthropy and personal affairs. This frequently involves complex cross-border tax planning and co-ordinating advice from advisers in different jurisdictions.

Charles also regularly advises foreign residents on the most tax efficient way to structure UK investments or a move to the UK. He also has experience of contentious UK and international trust and probate work – resolving disputes between trustees or executors and beneficiaries, acting for either side.



### DR ARIEL SERGIO GOEKMEN

Executive Board Member Schroder & Co Bank AG

Ariel Sergio Goekmen is a member of the executive board of Schroder & Co Bank AG, Switzerland and is in charge of the private client operations in Zurich. Here he manages teams looking after clients from Switzerland and Germany, as well as UK res non-doms, and those of Russian speaking Eastern Europe, and Nordic origin.

In his 30-plus year career, Ariel has held managerial positions at several banks in Switzerland and Liechtenstein. His focus is mainly on UHNW families and entrepreneurs, with the aim of mitigating risks and optimizing results in all areas of wealth management and related areas such as succession and estate planning as well as relocation, together with competent external specialists.

Ariel is a regular speaker and moderator at conferences and on specialist panels. He writes articles and has contributed to a number of books on wealth management topics.



### DR GUILLAUME GRISEL, LL.M. (CAMBRIDGE), PH.D., TEP

Partner, Bonnard Lawson; Committee Secretary, Swiss & Liechtenstein STEP Federation; Chairman, STEP Lausanne

Dr Guillaume Grisel is a partner at Bonnard Lawson – international law firm. He is a recognised expert in tax and estate planning, trust law and taxation, mutual assistance in tax matters, CRS and bank secrecy law.

His education (universities of Cambridge, Zurich and Lausanne) allows him to handle cases at the crossroads between civil law and common law, in three languages.

Guillaume advises international families, artists, sportsmen and art collectors, but also trust companies and family offices, and he serves as protector of trusts. He was also chairman of the board of a classical music festival for several years.

Guillaume regularly publishes, speaks and teaches at

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**DR. HANS-JOACHIM JAEGER**Partner
EY

Hans-Joachim joined EY in 2003 where he deploys more than 25 years professional experience in the financial services and tax consulting sector as a partner. Jochen is responsible for tax transparency initiatives as well as operational tax issues like Swiss stamp taxes, withholding tax issues. He also advises on financing structures, and in EY is additionally responsible for projects and thought leadership in the broader area of "tax transparency". Jochen was previously deputy tax director at a Zurich-based private bank. He advised several governments in initiating agreements with the U.S. on the implementation of FATCA and advised central banks on tax policy issues. In 2016, he was awarded the prize for Leading Individual Advisor by "WealthBriefing" (wealthbriefing.com). Jochen holds a doctorate in tax law and a master in business administration (finance & accounting) of the University of St. Gall (lic. oec. HSG). He is a qualified Swiss tax adviser and a Certified Financial Planner CFP®.



FELICITY KELLER LLB (HONS), BARRISTER-AT-LAW, TEP

Managing Director J. Stern & Co (Switzerland) AG; Co-Chair, Swiss & Liechtenstein STEP Federation

Felicity runs the J. Stern & Co private investment office operation in Zürich and is a board director of the Stern Group.

She has over 30 years of top level executive and technical client focused expertise, running operations in the private client, family office and private banking arena within Switzerland.

Felicity is currently chairwoman of the Swiss & Liechtenstein STEP Federation, and from January 2018 is elected to the Council of STEP Worldwide. She also acts as a judge for the 2018 WealthBriefing Swiss Awards.



**GERD KOSTRZEWA TEP** 

Partner
Heuking Kuhn Luer Wojtek

Gerd Kostrzewa (TEP) is a tax partner in the German law firm Heuking Kuhn Luer Wojtek. He was admitted to the bar in 1996 and joined Heuking in 1999 where he became partner in 2002.

Working from Heuking's Düsseldorf and Zurich offices, he consults international clients in all areas of taxation and succession planning. He has also guided over 300 clients through voluntary disclosure procedures.

He is a regular speaker at international conferences and was the Chair of the Individual Tax and Private Client Committee of the International Bar Association in the years 2014 to 2015.



### **DR PETER KRUMMENACHER**

Partner Henley & Partners Switzerland AG

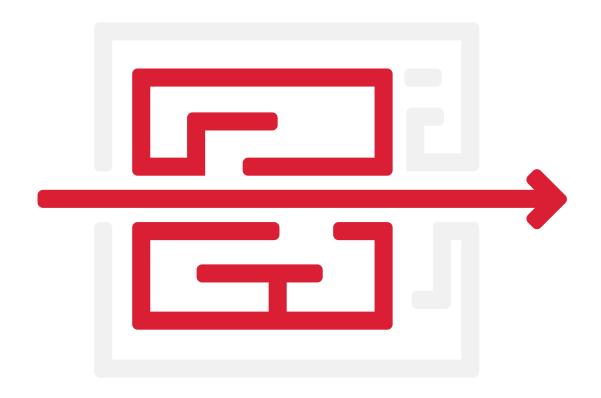
Dr. Peter Krummenacher is a lawyer and partner at Henley & Partners Switzerland AG in Zurich. Peter is an expert in international residence and citizenship planning and a member of the Investment Migration Council (IMC).

He is a holder of a master of law degree from the University of Zurich and a doctorate in law from the University of Lucerne.

Furthermore, he is an author of books and other publications on Swiss business law, Swiss immigration law, Swiss lump-sum taxation and related topics, and he is a frequent speaker at international conferences.



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HSH PRINCE MICHAEL OF LIECHTENSTEIN

Chairman Industrie- und Finanzkontor Ets. Wealth Preservation Experts

Prince Michael of Liechtenstein is chairman of Industrie- und Finanzkontor Ets., a leading trust company with a tradition and expertise in the long-term and trans-generational preservation of wealth, especially family wealth. Furthermore, he is also the founder and chairman of Geopolitical Intelligence Services AG, a geopolitical consultancy company, and information platform.

In addition, Prince Michael of Liechtenstein is a member of various professional organizations such as STEP, a board member of the Liechtenstein Institute of Professional Trustees and Fiduciaries, as well as chairman of the liberal think tank European Center of Austrian Economics Foundation.



**DR JEAN-FREDERIC MARAIA** 

Partner Schellenberg Wittmer Ltd

Jean-Frederic Maraia is a partner in Schellenberg Wittmer's taxation group in Geneva. He advises clients on all tax matters, at both domestic and international levels. His areas of expertise include M&A and real estate transactions, lump-sum taxation, estate planning, taxation for art related matters and tax litigation.

Jean-Frederic Maraia is a lecturer at the University of Geneva. In 2010 he became the executive director of LL.M. tax program at the School of Law at the University of Geneva. He is a member of the International Fiscal Association (IFA), Geneva Bar Association and Swiss Bar Association.



### **ANDREW McCALLUM**

Partner Rawlinson and Hunter SA, Geneva

Andrew is a trustee on various UHNW and HNW families, and also leads a wide portfolio of accounting and audit mandates in the private client, corporate and not-for-profit environments.

Andrew is a qualified Chartered Accountant (ICAS) and is a registered auditor in Switzerland, the UK and Ireland. He is the treasurer and a committee member of STEP Geneva, a member of the STEP Worldwide professional standards committee, and voluntarily sits as a member on the audit and risk commission of the International Federation of Red Cross and Red Crescent Societies

Andrew also sits on the organising committee of the Swiss & Liechtenstein STEP Federation Alpine conference.



### **TATIANA MENSHENINA**

Partner Withers LLP

Tatiana is a partner in the litigation and arbitration team and focuses on disputes involving Russia and the CIS.

She is an experienced commercial litigator, working on both court cases and arbitrations, with market-leading experience in complex cross-border disputes. She has worked on a range of high profile cases for both corporates and high net worth individuals.

Tatiana qualified as a solicitor – advocate with higher rights of audience, civil proceedings (England and Wales). She is also qualified as a Russian advocate and was called to the Moscow City Bar in 2002.

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    - Communications director mentoring



**RICHARD MORLEY** 

Partner BDO LLP

Richard is a Partner at BDO LLP with over 30 years of tax experience. He specialises in providing solutions to tax problems, managing investigations and voluntary disclosures with HMRC for both UK domiciled and non-UK domiciled clients.

Richard is a qualified chartered tax advisor, a fellow of the Association of Taxation Technicians and a member of the Society of Trust and Estate practitioners. Richard specialises in dealing with cases involving overseas assets and works with a worldwide network of contacts providing UK tax related solutions



DR DELPHINE PANNATIER KESSLER

Dr. iur., Attorney-at-Law and Public Notary (Wallis), LL.M. Partner Etude Pannatier & Ouinodoz SA

Delphine Pannatier Kessler is a partner in the law firm Etude Pannatier & Quinodoz SA in Sion, Valais. She holds a Doctoral degree from the University of Geneva and a LL.M. from Harvard Law School. She is an attorney and public notary in Valais.

She has written her doctoral thesis and a number of articles on the issue of the interface between trusts and civil law, especially real property and matrimonial law. She has worked in the private client practice group of Bär & Karrer AG in Zurich before returning to Valais, where she specializes in real estate, inheritance and litigation.



DR NATALIE PETER LL.M. TEP

Partner
Blum & Grob Attorneys

Natalie Peter is a partner at Blum & Grob Attorneys. She advises private individuals on all tax matters. This includes in particular the preparation of tax returns, obtaining ruling from the tax authorities and analysing, designing and implementing tax efficient structures.

She is highly experienced with the taxation of trusts and foundation as well as with the establishment of tax exempt non-profit organizations. Furthermore, Natalie Peter is an experienced advisor in international administrative assistance matters.

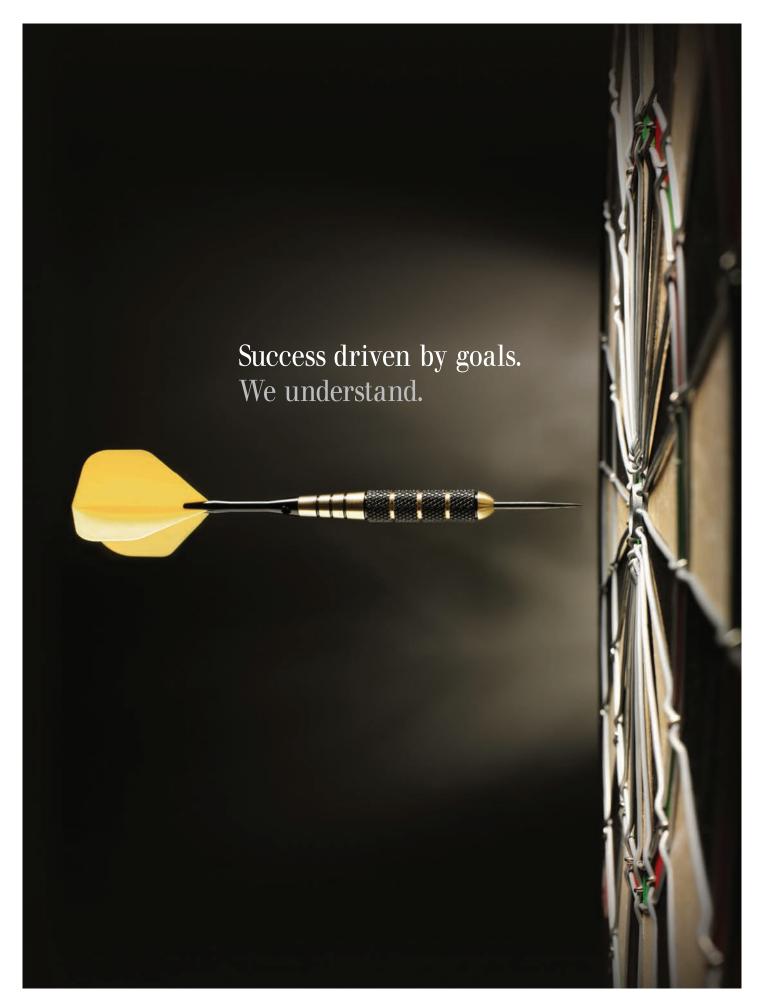


### **ALEXANDER RABIAN**

Partner, Streichenberg & Partner; Chairman of the SRO Board Swiss Association of Asset Managers (SAAM)

Alexander Rabian is Partner at the Zurich based law firm Streichenberg & Partner where he advises Swiss and international clients with a focus on financial services laws and regulations. Other important fields in which clients regularly seek his advice are IT, criminal, corporate, contract and intellectual property law.

Alex represents clients at court and vis-a-vis administrative bodies. He is the chairman of the SRO board of the Swiss Association of Asset Managers (SAAM) - the leading industry association of independent asset managers in Switzerland. In this capacity he also serves as a member of a number of private sector expert groups advising the Swiss Federal Government in matters of financial services regulations and international cooperation in tax matters.





**CHRISTIAN ROCKSTROH** 

Partner swisspartners

Chris has been a partner at swisspartners Group for nearly 18 years, focusing mainly on holistic, long-term wealth planning structures for international clients and their families. His advice may include written instruments such as family constitutions but also family charities, trusts, life insurance, private label funds and other modern instruments. Chris' strengths are listening, analyzing, advising and creating solutions.

He holds a PHD in comparative economics from the University of St. Gall, Switzerland.



**PATRICK SCHMUTZ** 

Attorney-at-Law Vallucci & Schmutz AG

Patrick is a partner in the Zurich based law firm Vallucci & Schmutz. He graduated from the University of Zurich with a law degree and from the University of Florida with a Master of Law (LL.M.) in Taxation. He is qualified as an attorney-at-law in Switzerland and as a Solicitor of the Supreme Court of England and Wales.

Patrick specialises in advising private clients, executives and entrepreneurs in Swiss and cross-border estate planning matters. His practice also focuses on resolving family, inheritance and trust disputes.



### **ALEXANDRE VON HEEREN**

Chairman of SATC, Chairman of the Board of Directors, Mandaris Ltd.

Alexandre von Heeren is the managing partner and owner of Basle/Zurich/Zug and Malta-based trust and advisory company Mandaris, where he also acts as executive chairman with overall responsibility for the firms legal & tax, fiduciary & accounting and trust & company services. In addition to his overall board and management responsibilities, Alexandre heads the firm's structured finance and investment fund solutions services.

Alexandre is a member of the Society of Trust & Estate Practitioners, the International Bar Association and the International Fiscal Association.

He is also the acting chairman of the Swiss Association of Trust Companies, of which Mandaris is a founding member.



DR CHRISTIAN VON OERTZEN

Partner Flick Gocke Schaumburg

Dr. Christian von Oertzen is partner in the German law firm Flick Gocke Schaumburg and head of the private clients department. He advises for more than twenty years national and international clients in estate planning, probate, income tax and capital gains tax matters and when immigrating or expatriating from Germany. He lectures regularly on national and international estate planning and tax planning for private clients and he published several articles on estate and gift tax planning and conflict of law questions. He is admitted to the bar in Frankfurt, is member of STEP Germany, member of the International Academy of Estate and Trust Law and is International Fellow of the American College of Estate and Trust Law. He is also member of the International Section of the NYSBA. He serves on the practitioners board of the German Law Review "Zeitschrift für Erbrecht und Vermögensnachfolge" (law review on inheritance laws and inheritance tax laws) and on the practitioners board of the German Law Review "Der ErbSt-Berater" (The Inheritance Tax Advisor).



### DAVID WALLACE WILSON TEP M.C.J. (NYU)

Partner Schellenberg Wittmer Ltd

David Wallace Wilson is a partner in Schellenberg Wittmer's private clients and estates practice in Switzerland. He advises individuals and families on all aspects of wealth structuring and estate planning for their personal and business assets. He also acts in complex guardianship and inheritance disputes, including administering international successions. Additional areas of expertise include anti-money laundering and art law.

David currently serves as chairman of STEP Geneva (officer since 2004), as editor of the *Trust Quarterly Review* and on the STEP Contentious Trusts and Estates Committee. He is the founder of www.trusts.ch.



### **KLEMENS R ZELLER**

Executive Director, Wealth Advisor JP Morgan, Geneva

Mr. Zeller is a wealth advisory professional with over 20 years of global experience in advising UHNW families who originate in Latin America. He is skilled in business development activities with expertise in wealth preservation and wealth structuring, integrated wealth transfer solutions, governance, fiduciary planning and tax optimization strategies in a multi-jurisdictional context. Having worked at several global financial institutions in Zurich, Nassau (Bahamas), New York and Miami, he is presently based in Geneva. He is fluent in English, German and Spanish and has basic knowledge in French and Portuguese. Mr. Zeller earned a bachelor's degree in business administration from the KV Zurich Business School in Zurich in 1997 and became a Certified Financial Planner (CFP®) in 2003. He is a registered Trust and Estate Practitioner (TEP) with the Society of Trust and Estate Practitioners and a member of the Financial Planning Association (FPA), International Fiscal Association (IFA), International Wealth Planners (IWP) and Family Firm Institute (FFI).

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### INDUSTRIE-UND FINANZKONTOR

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generations. The experience necessary to do this comes from the roots. Although the inception of Industrie- und Finanzkontor Ets. only dates back to 1948, those roots extend much farther into the past; they are embedded in the Princely House of Liechtenstein.

All employees of Industrie- und Finanzkontor Ets. build an experienced team in various disciplines and have access to a global network of professional partners. The company's specific areas of expertise are based on the development of wealth preservation strategies, encompassing the: • Implementation of Family Governance • Intra- and extra-familial long-term financial planning

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We offer a range of services across the Group; in Switzerland these include, but are not limited to:

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BDO's global network across 158 countries is utilized for clients with an international focus. BDO Ltd, with its head office in Zurich, is an independent, legally separate Swiss firm belonging to the international BDO network, whose head office is in Brussels (Belgium).



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work, enabling them to focus on other business-critical core tasks. Built on its founder's extensive expertise in the sector across North America, Europe, the Middle East and Asia, we deploy a range of skills in pursuit of our goal of adding value to clients brand leveraging activities. These include:

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- Editorial development (e.g. copy-writing, speech writing, editing and proofing)
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For further information please contact: Nicholas & Jackie Boole + 44 (0) 1845 578193 / enquiries@thebeehivepartnership.com

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