



Corporate Tax Alliance

**Members Directory
2014**

Australia



Philip Price

Level 12, 60 Castlereagh Street
Sydney NSW 2001

Telephone + 61 2 9233 8933
Telefax + 61 2 9233 8521
E-mail philip.price@rsmi.com.au
philip.price@corptax.org

Philip graduated in Accounting and Taxation from New England University in Australia and worked in a broad based tax practice with Bentleys MRI in Australia. In late 1992 Philip transferred to the Netherlands to further his international tax experience with Paardekooper & Hoffman in Amsterdam, became a partner specialising in international tax and continuing to work on multinational company and high net worth clients with activities in Europe, North America and in the Asia Pacific Region. During those 10 years he benefited from membership of the National Federation of tax advisers and lectured on international tax across Europe and North America. In 2003 Philip returned to Australia and set up his own International Tax Practice which has since been merged back into the MRI network. Philip's current main area's of professional activity include issues connected with profit allocation to branches, tax efficient structuring of company finance and finance products, and foreign inbound investment into Australia. He is also actively involved in consultative committees engaged in the Review of International Tax Arrangements (RITA) in Australia.

Areas of expertise

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| <input checked="" type="checkbox"/> Corporate income tax | <input checked="" type="checkbox"/> Withholding taxes and tax credits | <input checked="" type="checkbox"/> International tax planning |
| <input type="checkbox"/> Mergers & Acquisitions | <input checked="" type="checkbox"/> Profit allocation to branches | <input checked="" type="checkbox"/> Expatriate taxation |
| <input checked="" type="checkbox"/> Reorganisations | <input type="checkbox"/> Tax litigation | <input type="checkbox"/> Tax Compliance |
| <input type="checkbox"/> Transfer Pricing | <input type="checkbox"/> Tax audits | <input type="checkbox"/> VAT |

Argentina



Daniel Rybnik

Sinclair 3139 3b
CI425FRE Buenos Aires

Telephone +54 11 4776 8200
Telefax +54 11 4776 8111
E-mail drybnik@enterpricing.com
daniel.rybnik@corptax.org

Daniel Rybnik studied law at the Fordham University in America and at the University of Buenos Aires. He has been operative in the tax service since 1991 and held several senior positions with Coopers and Lybrand. Before joining Enterpricing in 2003, he worked for Ernst and Young as head of the international tax services in Argentina. He has experience in several tax areas and is currently focused on transfer pricing.

Areas of expertise

- Corporate income tax
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- Profit allocation to branches
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- Tax audits
- VAT

Austria



Robert Schneider

Hormayrgasse 7A Top 18
A-1170 Vienna

Telephone + 43 | 486 720 90
Telefax + 43 | 486 720 919
E-mail email@tax-law.at
robert.schneider@corptax.org

Robert is an attorney at law, an Austrian tax advisor and public accountant. He started in January 1987 with Ernst & Whinney and has worked for several major companies in Austria as a tax advisor and lawyer. Since August 2003 he is a lawyer at his own firm.

Areas of expertise

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Belgium



Bernard Peeters

Havenlaan 86c/b 419 Avenue du Port
1000 Brussels

Telephone +32 277 34000

Telefax +32 277 34055

E-mail bernard.peeters@tiberghien.com
bernard.peeters@corptax.org

Bernard Peeters is a Partner at Tiberghien. He is a member of the Brussels and Luxembourg Bar. As a lawyer, his area expertise mainly focuses on corporate tax, mergers and acquisitions, private equity, international and European tax planning as well as double tax treaties.

Bernard lectures at the University of Brussels (VUB) on tax law (Double Tax Treaties and Triangular Cases) and is a frequent speaker at tax seminars in Belgium and abroad. In 2011, he was appointed as auxiliary judge of the Antwerp Court of appeal. He now regularly assists the Court in international tax cases.

Bernard is member and former chair of the tax & legal committee of the European Venture Capital and Private Equity Association (EVCA), a member of the tax and legal committee of the American Chamber of Commerce in Belgium (AMCHAM) and the Belgian Venturing Association (BVA) and member of the International Fiscal Association (IFA), the American Bar Association (ABA) and the International Association of Tax Judges (IATJ). He is also a member of the editorial staff as well as former chief editor of the monthly newsletter on international tax "Fiscoloog Internationaal" and member of the editorial staff of "Tijdschrift voor Fiscaal Recht". Bernard is a regular contributor to a wide variety of fiscal-related publications consisting of articles, books and monographs.

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China



Michael Zheng

21#301, Zhengli Road,
Yangpu District 200434 Shanghai

Telephone + 86 (21) 6135 6286 * 102
Telefax + 86 (21) 6135 6267
E-mail Michaelzhengtax@sina.com
michael.zheng@corptax.org

Michael graduated from Shanghai Jiaotong University and started his professional career in Tax, Legal and Business Advisory division of PwC Shanghai. During his years in PwC, Michael has built up knowledge with respect to PRC tax, customs and legal systems. He has extensive experience in advisory projects for multi-national corporations in their investment projects in China and is still providing on-going services to many of them.

Michael has become an expert in advising foreign investors in doing business in the different stages – planning in the pre-investment stage, setting up various business vehicles in China in the investment stage, advising clients on various PRC tax, customs, labor, foreign exchange and legal issues, assisting in some M&A transactions and advising on the disposal of China investment. In addition to corporate tax planning, Michael also has extensive experience in assisting individuals, expatriates and Chinese nationals, to design and implement tax efficient packages to minimize Individual Income Tax in China.

During his career, Michael has also been seconded to a China Holding Company, held by German headquarter, as a great China tax leader for more than six months, developing and implementing the effective and efficient tax strategy and practices for all entities in China and ensure compliance with the tax laws and regulations.

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Cyprus



Andreas Athinodorou

Elia House, 77 Limassol Avenue
2121 Nicosia, Cyprus

Telephone +357 224 188 14
Telefax +357 224 188 15
E-mail andreas.athinodorou@taxaz.com
andreas.athinodorou@corptax.org

Andreas studied Business Economics and Accounting at the University of Southampton, UK. He is a Fellow Chartered Accountant of the Institute of Chartered Accountants of England and Wales (I.C.A.E.W.).

Andreas specialised in national and international tax planning at one of the big four audit companies before setting up his own practice. He is connected to different organisations and has also published a number of technical articles in international publications. Andreas is one of the founders of the tax firm Athinodorou & Zevedeou, a company specialising in providing International Tax Advice with a prime focus on Cyprus.

Andreas is also a founding member and on the board of directors of the Cyprus Investment Funds Association (CIFA).

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Cyprus



Marina Zevedeou

Elia House, 77 Limassol Avenue
2121 Nicosia, Cyprus

Telephone +357 224 188 14
Telefax +357 224 188 15
E-mail marina.zevedeou@taxaz.com
marina.zevedeou@corptax.org

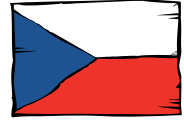
Marina graduated with a degree in Economics, Accounting and Finance from the London School of Economics, UK. She is a Fellow Chartered Accountant of the Institute of Chartered Accountants of England and Wales (I.C.A.E.W). She has worked with PriceWaterhouse and Arthur Andersen. She specialised in national and international tax strategy and planning with one of the big four audit firms.

Marina is one of the founders of Athinodorou & Zevedou, a company specialising in providing International Tax Advise with a prime focus on Cyprus.

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Czech Republic



Helena Navratilova

Jungmannova 24
110 00 Prague 1

Telephone + 420 224 103 316
Telefax + 420 224 103 234
E-mail hnavratilova@ksb.cz
helena.navratilova@corptax.org

Helena graduated at the University of Economics in Prague and worked at the university as assistant professor. In 1990 Helena joined PriceWaterhouse and in 1993 qualified as a tax advisor. She worked for four years as a tax manager at PriceWaterhouse. Since 1995 she is a tax partner at Kocian Solc Balastik in Prague.

Helena is a member of the Czech Chamber of Tax Consultants (Corporate Income Tax and International Taxation Working Groups) and the International Fiscal Association. Helena is author of articles and reports in IBFD and IFA publications.

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Denmark



Henrik Dietz

Toldbodgade 39
1253 Copenhagen

Telephone + 45 33 19 33 16
Telefax + 45 33 91 80 20
E-mail hd@actiolaw.com
henrik.dietz@corptax.org

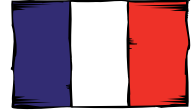
Henrik is a graduate in Law from the University of Copenhagen in 1991. He worked at the Danish tax authorities for 4 years, 3 years as a senior consultant at the Danish Parliament attached to the Danish Tax Committee, 3 years with a major Danish law office and 6 years with Anderson and Deloitte.

Henrik is a partner in ACTIO Law in Copenhagen. He is specialized in international tax for companies and individuals. Areas of expertise: corporate tax, Danish and international mergers and acquisitions, reorganisations, withholding taxes and tax credits, tax litigation, tax audits, international tax planning ACTIO Law also provides legal service within commercial and corporate law, real estate, insolvency and IP law. For the past number of years, Henrik acted as tax advisor to a number of large Danish corporations and multinationals.

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France



Vincent Grandil

31 Avenue Hoche
75008 Paris

Telephone +33 142 270 538
Telefax +33 142 272 523
E-mail vincent.grandil@altexisnet.com
vincent.grandil@corptax.org

Vincent Grandil has more than 23 years of experience in the tax field. Prior to joining Altexis Law firm as senior partner, Vincent served as Chief Tax Officer and Senior Vice President of Havas, the 6th largest advertising group worldwide operating in 75 countries (2000 – 2004). Until 1999 he was Vice President - Tax department of Aventis, 5th largest pharmaceutical company worldwide, operating in more than 135 countries (1989 – 2000).

He started his career as Tax Auditor, working for the French tax authorities (8 years). Vincent has acquired particular expertise in international tax reorganisations, effective tax rate management, transfer pricing, complex tax litigations and development of sophisticated remuneration tools for top executives or wealthy individuals. Vincent Grandil is member of the tax steering committee of the French-American chamber of commerce. He chaired the group designated by the MEDEF (French confederation of industry) to monitor the tax issues related to the development of the Electronic Commerce. Vincent is member of the IBA. He is guest speaker in various seminars and universities. Vincent has a master in Business Law (Panthéon-Sorbonne) and is graduated from the French National Tax School.

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Germany



Volker Streu

Esche Schümann Commichau
Am Sandtorkai 44
20457 Hamburg

Telephone + 49 40 36805-561
E-mail v.streu@esche.de
volker.streu@corptax.org

After an apprenticeship with Deutsche Bank Volker graduated in business administration at the University of Hamburg in 1992. He became an assistant teacher at the International Tax Institute in Hamburg thereafter and finished his academic education there with thesis on “Cross border leasing in multinational companies”, and received a Ph.D. in Business Administration for this work in 1997. He passed the German tax advisor exam and became an accredited tax consultant in 1997.

He worked as tax consultant in the head office for Tax and Law at BDO; specialized in International taxation. He joined Ernst & Young as a manager in 1998 and worked mostly for inbound clients, among them large US-based multinational groups. Volker was assigned to the German Tax Desk in New York, USA during 2000/2001 and worked as a Senior Manager in the International Tax Services group of Ernst & Young thereafter. In April 2005 he opened his own tax firm in Hamburg to serve international clients with ongoing compliance and consulting services.

Since 2005 Volker is working in a multi disciplinary law, tax and audit firm as partner.

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India



Rajat Chawla

43, Daryaganj
110002 Delhi

Telephone + 91 11 232 434 56
Mobile + 91 987 149 44 99
e-mail rajatchawla@jpc.co.in
rajat.chawla@corptax.org

Rajat Chawla is the Chief Executive Officer for M/s J P Chawla & Co.'s operations and is also the Managing Partner. He is a Fellow member of the Institute of Chartered Accountants in India and also a Certified Public Accountant from The American Institute of Certified Public Accountants, United States of America (not in public practice). Rajat is a commerce honours graduate from Delhi University, Delhi, India and a Certified Information System Auditor and a member of Information system Audit and Control Association, United States of America. He has been trained as a Chartered Accountant in one of the most prestigious Big Four firms "Deloitte Haskin and Sells" and holds a certificate in International taxation from the Institute of chartered accountants of India.

Rajat is a member of Executive Committee of Indian Federation of United Nation Association (IFUNA) and also a member of Committee of Chamber of Tax Consultants (New Delhi Chapter).

Rajat has been extensively involved in services to clients in various industry verticals. He has also had exposure to a cross section of industries including Electricity distribution and Power, Manufacturing, Telecommunication, Fast moving consumer goods, information technology, publishing & printing, MRO, Media, Banking, Microfinance, Infrastructure, Oil & Gas and automobile sector to name a few..

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India



Richa Juneja Chawla

43, Daryaganj
110002 Delhi

Telephone + 91 11 232 434 56
Mobile + 91 999 050 97 09
e-mail richajuneja@jpc.co.in
richa.juneja@corptax.org

Richa Juneja Chawla is a qualified Chartered Accountant having 7 years experience of working with M/s Mohinder Puri & Co., Chartered Accountants (Indian affiliate of World Tax Services). She has an experience of handling International taxation matters involving Permanent Establishment issues of Foreign Companies and Transfer Pricing.

Presently she is Partner in J P Chawla & Co. looking into various International Taxation matters and has an experience of representing Indian as well as foreign clients before Tax, Appellate and Regulatory Authorities for cases covering Corporate Tax Assessments, Transfer Pricing and International taxation matters.

In Transfer Pricing Richa has an experience of working on various Transfer Pricing software's used for Benchmarking purposes and further in conducting Transfer Pricing Audit and in preparation of Transfer Pricing study report and documentation.

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Ireland



Brendan Sherry

98 Lower Baggot Street
Dublin 2

Telephone + 353 1 67 62 262
E-mail brendan@hiberniastrust.ie
brendan.sherry@corptax.org

Brendan is a Fellow of the Institute of Chartered Accountant in Ireland with over 40 years experience of the Irish business environment. He is Managing Director of the Hibernia Trust Limited.

Brendan is also currently managing partner of Sherry McNabola Murray & Company, a firm of Chartered Accountants and Registered Auditors, Previously he worked as a consultant with Arthur Young and Company.

The Hibernia Trust is a firm of specialist tax consultants based in Dublin, Ireland. The Hibernia Trust works with owners and managers in protecting and preserving the capital of their organisations, by reviewing the tax structures in use and where appropriate, assisting them to avail of the competitive Irish tax regime.

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Italy



Walter Pugliese

Via Sant'Eufemia, 2
20122 Milano

Telephone + 39 (0)2 87380518
Telefax + 39 (0)2 87380630
E-mail walter.pugliese@studiowpugliese.it
walter.pugliese@corptax.org

Walter is an international tax consultant and chartered accountant. He was graduated with honors at Bocconi University in Milano and has extensive experience: designing and implementing tax projects for national and multinational companies; assisting foreign companies willing to start a new business in Italy; performing accounting and tax due diligence. Walter formed his own tax firm in 2007 after 15 years spent as a consultant and partner in several Italian tax and law firms.

Areas of expertise

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Italy



Paolo Troiano

Viale Majno 26
20129 Milano

Telephone + 39 02 7628 0824
Telefax + 39 02 7600 7783
E-mail ptroiano@troianoassociati.it
paolo.troiano@corptax.org

Paolo graduated from the University of Rome. He first joined the Credit Department of the –at the time – leading Italian Bank Banca Commerciale Italiana, in Paris; in 1995 he moved to London, to practice as a tax adviser first with Wycombe Hurd & Co. Solicitors and then with the international tax department of PWC. At the end of 1998, he returned to Italy practising as tax advisor in the tax department of KPMG Italian correspondent law firm for a period of 3 years. He then spent four years with the firm Macchi di Cellere Gangemi, where he was partner in charge of the Milan based tax department and then he became head of the Tax Department of Studio Legale Galgano in Milan.

He is a founder of the firm Studio Legale Tributario Troiano & Associati. His practice consists in general Tax and Company Law, specialising in domestic and international tax matters. Paolo advises Italian and foreign multi-national and medium-sized companies on mergers and acquisitions, domestic and international groups reorganisations and structuring of outbound and inbound investments. He also has an important niche of so called High Net Worth Individuals who advice on corporate and tax affairs specializing in real estate and family planning.

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Libya



Tariq Almontaser

311 Rocky Lane, Great Barr
Birmingham, United Kingdom
B42 1NG

Telefax
E-mail

+ 44 7731 541 279
tariq@almontaser.com
tariq.almontaser@corptax.org

Tariq Almontaser, Master of Science in Accounting (since 2001) and currently studying PhD in accounting in the University of Reading. He is an expert on tax law in both Libya and Tunisia. He contributed in developing the curriculum of subjects related to Accounting Science at the Libyan universities and institutes and works as a tutor and lecturer at the faculty of Administrative and Financial Sciences in Tripoli. At the same time, Tariq works as a branch manager at the Almontaser Office (since 2004), being a Tax Consultant in Libya for clients mainly from Europe. He is a member of the Syndicate of Libyan Accountants & Auditors. Tariq is currently focusing on providing the mentioned services online.

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Luxembourg



Stefan Arts

2, rue de la Reine
L-2418 Luxembourg

Telephone +352 226 331
Telefax +352 226 353
E-mail Stefan@taxsarts.com
stefan.arts@corptax.org

Stefan started his career at Price Waterhouse Coopers after graduation from the University of Tilburg. Stefan worked for more than 8 years as a tax consultant, specialised in several tax matters, for one of the big four audit firms. He held senior positions with Loyens & Volkmaars Breda and Luxembourg. In 1999 Stefan started his own firm, Tax S.Arts. He has ample experience in advising national and international clients on international taxation law, financial instruments, venture capital, private equity schemes, holding, royalty, partnership and branch structures.

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Malta



Antoine Naudi

Flat 14, Marina Court
Abate Rigord Street, Ta'Xbiex XBX 1120

Telephone + 356-21-336555 / 56
Telefax + 356-21-330713
E-mail anaudi@naudimizzi.com
antoine.naudi@corptax.org

Antoine studied law at the University at Malta and graduated with a Doctorate in law from the University in 1995. Completed a two year post graduate course leading up to a Masters in Financial Services from the University of Malta. Has a diploma in Taxation from the Malta Institute of Taxation and successfully completed the Malta Financial Services Authority/Institute of Financial Services Practitioners First Certificate course in Trusts Law & Management.

He is also one of the arbitrators at the Malta Arbitration Centre and a legal advisor to various local corporate entities and cooperative societies and very active in the field of international tax planning and structures. Antoine is a member of Malta Chamber of Advocates, Malta Institute of Taxation and Institute of Financial Services Practitioners. Antoine also serves as a member of the Administrative Review Tribunal.

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Mexico



Juan Angel Becerra

500 Guillermo Gonzalez Camarena, Suite 501
Santa Fe, 01210

Telephone + 52 55 5292 4071, 4329, 1055
Telefax + 52 55 5292 4071
e-mail jab@iao.com.mx
juan.angel.becerra@corptax.org

Juan Angel Becerra has a Masters in Tax Law in Mexico and an LL.M. in International Taxation from Leiden University. Before founding his own consulting firm, he was an international tax partner with KPMG in Mexico and was responsible for the Mexican Centre of Excellence of KPMG Mexico in New York in the period 2003 - 2005. Juan has more than 18 year experience in providing tax advisory to multinational companies on tax treaty interpretation, cross-border M&A, and cross-border financial transactions. His areas of expertise include the banking industry, the insurance industry, real estate investment funds, real estate opportunity funds, the manufacturing and the construction industry.

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The Netherlands



Jan van Tilburg

President Kennedylaan 19
2517 JK Den Haag

Telephone +31 70 365 6617
Telefax +31 70 392 3793
E-mail jan.van.tilburg@fisconti.nl
jan.van.tilburg@corptax.org

After his graduation in taxation law from the University of Leiden, Jan started to work as a tax consultant with Ernst & Young. For this firm he worked in The Hague, London and Rotterdam. Meanwhile he also finalised the post graduate education in Europe Fiscal Studies at the University of Rotterdam, lectured at various institutes and wrote various publications.

Jan found his real passion in advising multinational companies in Dutch and international corporate tax matters. Till 2004 Jan was partner in the multinational tax practise of Ernst & Young. In 2004 Jan founded Fisconti Tax Consulting and took the initiative to create an international network of corporate tax specialists, Corporate Tax Alliance.

Fisconti has grown into a specialised tax firm, offering a comprehensive range of tax services to companies. Within Fisconti, Jan's specialisation is advising multinational companies, varying from some of world's leading businesses to start-up companies, in the field of Dutch and international taxation.

Areas of expertise

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| <input checked="" type="checkbox"/> Corporate income tax | <input checked="" type="checkbox"/> Withholding taxes and tax credits | <input checked="" type="checkbox"/> International tax planning |
| <input checked="" type="checkbox"/> Mergers & Acquisitions | <input checked="" type="checkbox"/> Profit allocation to branches | <input type="checkbox"/> Expatriate taxation |
| <input checked="" type="checkbox"/> Reorganisations | <input type="checkbox"/> Tax litigation | <input type="checkbox"/> Tax Compliance |
| <input type="checkbox"/> Transfer Pricing | <input checked="" type="checkbox"/> Tax audits | <input type="checkbox"/> VAT |

The Netherlands



Jos Peters

Wijnhaven 3r
3011 WG Rotterdam

Telephone +31 10 201 0820
Telefax +31 10 201 0829
E-mail jos@merlyn.eu
jos.peters@corptax.org

Jos Peters started his career as tax inspector and worked with the Ministry of Finance. He worked as tax director with Ernst & Young and headed the European tax department of a US based multinational company. Jos has wide experience in all major corporate tax areas, including VAT. He frequently writes about international corporate tax issues in both financial newspapers and tax magazines.

Areas of expertise

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| <input checked="" type="checkbox"/> Corporate income tax | <input checked="" type="checkbox"/> Withholding taxes and tax credits | <input checked="" type="checkbox"/> International tax planning |
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| <input type="checkbox"/> Transfer Pricing | <input checked="" type="checkbox"/> Tax audits | <input checked="" type="checkbox"/> VAT |

Poland



Paweł Gruza

ul. Konduktorska 4/32
00-775 Warsaw

Telephone + 48 (22) 55 80 300
Telefax + 48 (22) 85 12 060
E-mail pawel.gruza@mmr.pl
pawel.gruza@corptax.org

As an equity partner and a member of the Management Board of the tax advisory firm MMR Consulting, Paweł is responsible for foreign investors advisory and tax compliance services. He specializes in value added tax (VAT), corporate income tax (CIT) and excise duty issues. His professional experience includes structuring and optimizing cross-border transactions and holdings. His industry specialization covers real estate, energy, chemical and the financial sector.

Paweł graduated of the University of Warsaw, Law Faculty in 2000. Active in tax consulting since 2000 when he joined Arthur Andersen; continued work at Ernst & Young until the end of 2006. Before that he also worked at a Warsaw law firm and Tax Studies Institute, as well as at the Chancellery of the President of Poland. After finishing his career at Ernst & Young he was also a freelance business advisor in the energy sector.

Areas of expertise

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| <input checked="" type="checkbox"/> Corporate income tax | <input type="checkbox"/> Withholding taxes and tax credits | <input checked="" type="checkbox"/> International tax planning |
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Portugal



João Espanha

Rua Castilho, 75, 8-D
1250-068 Lisbon

Telephone + 351 21 353 8705
Telefax + 351 21 314 3704
E-mail joao.espanha@espanhaassociados.pt
joao.espanha@corptax.org

João Espanha studied law at the University of Lisbon Law School and has post-graduated degrees in Securities Law and Advanced Taxation (IDEFF).

Before he started his own firm, Espanha e Associados, in 2004, João worked as a tax consultant and partner in medium-sized law firms. João Espanha is member of the Portuguese Bar Association.

Areas of expertise

- Corporate income tax
- Withholding taxes and tax credits
- International tax planning
- Mergers & Acquisitions
- Profit allocation to branches
- Expatriate taxation
- Reorganisations
- Tax litigation
- Tax Compliance
- Transfer Pricing
- Tax audits
- VAT

Russia



Yuri Nechuyatov

25a, Bolshoy Strochenovsky lane
115054 Moscow

Telephone + 7 495 980 88 77

E-mail yuri.nechuyatov@intelliq.ru
yuri.nechuyatov@corptax.org

Yuri is a managing partner in IntelliQ, a new independent Moscow-based professional firm specialized in transaction support and tax advisory services. Prior to founding IntelliQ, he was the Chief Financial Officer of Troika Dialog Group, Russia's leading integrated privately owned investment group. As CFO of Troika Dialog Yuri was responsible for managing several key operating divisions, such as Finance and Settlements, was a Member of the Management Board and was also responsible for oversight of some strategic projects.

Yuri joined Troika Dialog in 2007 from Ernst & Young, where from 2003 through 2007 he was a tax partner running the Financial Services Tax practice for Russia and CIS. Yuri's extensive client portfolio included major international and Russian banks and other companies.

During the period of 6 years prior to joining Ernst&Young Yuri worked at Credit Suisse First Boston in Moscow, Singapore and London where he played different roles in business and support divisions. Yuri joined Credit Suisse First Boston from Coopers&Lybrand (now part of PricewaterhouseCoopers) where from 1992 to 1998 he worked as a tax adviser.

Areas of expertise

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Serbia



Ivana Blagojevic

Jurija Gagarina 164
11000 Belgrade

Telephone + 381 63 747 888 7

E-mail info@serbiantaxation.rs
ivana.blagojevic@corptax.org

Ivana graduated from the Belgrade Law School in 1999 and started to work with a local firm, where she has been mostly engaged in incorporation of companies and advising on day to day business issues. Ivana started her tax consulting career in 2002 in Serbia, when she engaged with Deloitte. After two and a half years of consulting large multinational and local firms on all aspects of tax, she started to cooperate with the biggest Serbian law offices Karanovic & Nikolic. During her cooperation with the law office, she not only advised resident and non-resident clients in tax matters, but also represented them before competent authorities, which she was not allowed during her engagement with Deloitte (due to the fact that in Serbia only licensed lawyers may represent legal and natural persons before courts and other authorities).

As to membership in professional organisations, since 2007 she is a founding member of the IFA Serbian branch, and her admission in the Serbian Bar Association is pending.

Areas of expertise

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Singapore



Nico Derksen

14 Robinson Road | 3-00 Far East Finance Building
048545 Singapore

Telephone + 65 315 202 47/ + 65 977 64 058
Telefax + 65 315 202 48
E-mail Nico.derksen@itm.com.sg
nico.derksen@corptax.org

Trained as a tax lawyer, Nico started his career at the Dutch revenue service. After almost 9 years, he left as a chief inspector to join the international tax practice of Ernst & Young. For EY Nico worked in the Netherlands, USA, Slovenia, India, and Singapore. Early 2012 he decided to start his own niche practice in Singapore, purely having a focus on international tax advisory in a more practical and personalized manner.

Areas of expertise

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Slovenia



Alan Maher

Smartinska 106
1000 Ljubljana

Telephone + 386 1 600 30 92
Telefax + 386 1 600 30 99
E-mail alan.maher@cautelapros.si
alan.maher@corptax.org

Alan has acquired majority of his professional experience as tax advisor with one of the international audit and advisory companies. In his year professional carrier he specialized in taxation in financial sector, mergers and acquisitions and corporate income tax. He also gained experience in registration and reporting of a number of foreign investment funds in Slovenia. He was also engaged in many of the international acquisitions where he served a number of foreign investors.

In 2006 he worked in Prague – Czech Republic as specialist for acquisitions of various real estate companies. He was also CEE real estate industry leader for Slovenia in the area of taxes. In the past he was also involved in audit of taxes with a large number of Slovene and international clients.

In Slovenia he organized tax seminars in the field of withholding taxes, capital gains and taxation of financial instruments. Alan speaks English and German language.

Areas of expertise

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Spain



Victor Manzanares Sainz

Alfonso XII 30 - No 5
28014 Madrid

Telephone + 34 91 319 96 86
Telefax + 34 91 308 53 68
E-mail vmanzanares@mmmm.es
victor.manzanares.sainz@corptax.org

Graduated with a degree in Economics from the Autonomous University of Madrid and Master's degree in tax law from the Instituto de Empresa Business School, Victor started his career more than eighteen years ago in a local firm providing tax services to individuals as well as small companies for day to day business activities.

In 1998 he joined Landwell, a member firm of PwC, providing tax services to family businesses in the framework of CIT as well as PIT and VAT.

At the present time Victor is head of the Madrid office tax department at Monereo, Meyer, Marinel-lo Abogados, S.L.P. advising on close and open ended Funds and private equity investing in Spanish real estate and renewable energies sectors with heavy involvement in the tax Due Diligence process and business restructurings.

Frequent lecturer and panellist for organizations and events related to family business tax planning and tax implications for the acquisition of real estate entities.

Areas of expertise

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Switzerland



Bernhard auf der Maur

Herrengasse 14
6430, Schwyz

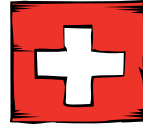
Telephone + 41 41 819 6060
Telefax + 41 41 819 6069
E-mail bernhard.aufdermaur@convisa.ch
bernhard.auf.der.maur@corptax.org

Bernhard graduated in business administration at the University of St. Gallen and post graduated international tax at the Swiss Academy of Zürich. He worked as a tax manager at several big firms in Switzerland before he joined Convisa as a tax partner in 1999. He is also a member at the Swiss Institute of Certified Accountants and Tax Consultants, Swiss Association of certified tax experts and the Institute for Swiss and International tax law.

Areas of expertise

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Switzerland



Richard Wuermli

Löwenstrasse 11
8023 Zurich

Telephone + 41 44 225 8585
Telefax + 41 44 225 85 95
E-mail richard.wuermli@taxexpert.ch
richard.wuermli@corptax.org

Richard is a certified tax expert. He started his career at PriceWaterhouseCoopers for 8 years. Hereafter he became partner in the Tax & Legal practice of Deloitte for twelve years. The last 8 years he is a Managing Partner at Tax Expert International AG.

Areas of expertise

- Corporate income tax
- Withholding taxes and tax credits
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- Profit allocation to branches
- Expatriate taxation
- Reorganisations
- Tax litigation
- Tax Compliance
- Transfer Pricing
- Tax audits
- VAT

Turkey



Selçuk Akkas

Eski Uskudar Yolu Cad. Ozis ABlok NO 21/4
Atasehir 34752 Istanbul

Telephone + 90 216 469 63 63
Telefax + 90 216 469 63 40
E-mail sakkas@akkaslaw.com
selcuk.akkas@corptax.org

Selçuk has over eighteen years experience in business and corporate law, he assisted his firm's clients on domestic and international commercial transactions and is currently serving as the Akkaş & Associates Law Firm's Senior Partner. Before started his own practice, he worked for Eczacıbaşı Pharmaceutical Marketing Company for 4 years as an in-house counsel. Later he moved to Telecommunication field and worked for Rumeli Telecom Inc. for about a year.

With a corporate background Selçuk now is able to help his business clients discover how the tax code can be used to their advantage with tax planning. By finding deductions and other items they may not be aware of, he gives small companies the large company advantage.

During his master, Selçuk worked and studied in Houston, Texas for about eight years and had a chance to become proficient in American & International Business Law. Selçuk has over ten years experience in the field of business bankruptcies and is particularly experienced in acquisitions of companies and substantial assets of companies that are financially troubled, both in the context of a pre-bankruptcy restructuring and in a pending bankruptcy. He has substantial experience in negotiations and structuring of acquisitions and sales of businesses, including related disputes, such as enforcement of non-competition and non-solicitation agreements, debt restructuring and workouts, organizational structure and shareholder disputes.

Areas of expertise

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| <input type="checkbox"/> Transfer Pricing | <input type="checkbox"/> Tax audits | <input checked="" type="checkbox"/> VAT |

United Kingdom



Robert Newey

3 More London Riverside
SE1 2RE London

Telephone + 44 20 7407 9434
Telefax + 44 20 3137 5525
E-mail newey@robertnewey.com
robert.newey@corptax.org

Robert Newey is an English Solicitor and Chartered Tax Advisor (Fellow). He qualified in 1982 and worked in City of London law firms until he started his own specialist tax law practice (now based near Tower Bridge) in 1995. He advises on tax issues for businesses (including direct taxes and VAT). He also helps with cross-border tax problems, both for individuals and for businesses. He has long experience of tax litigation. His clients range from individuals to quoted multinational groups.

He has worked on mergers, acquisitions and reorganisations, both as a tax advisor and as a corporate lawyer. He has also set up employee share schemes for clients, including overseas groups with UK employees.

Areas of expertise

- Corporate income tax
- Withholding taxes and tax credits
- International tax planning
- Mergers & Acquisitions
- Profit allocation to branches
- Expatriate taxation
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- Tax litigation
- Tax Compliance
- Transfer Pricing
- Tax audits
- VAT

Uruguay



Juan Ignacio Frascchini

Wilson Ferreira Aldunate 1342 Esc. 201
Montevideo 11100

Telephone + 598 2 9000 555
Telefax + 599 2 9089 272
E-mail jfrascchini@enterpricing.com
juan.ignacio.frascchini@corptax.org

Juan Ignacio Frascchini studied law at the University of Uruguay and has a master degree in tax law from the University of Konstanz in Germany. In 1997 he joined Uruguay XXI, the Uruguayan Investment & Exports Promotion Agency, where he advised foreign investors and Uruguayan companies on business and taxation issues. In 1999 he joined the law firm Falchetti & Frascchini and in 2002 the firm Frascchini & Associates, where he currently runs the Corporate & Tax Department, advising domestic and international clients on Uruguayan as well as international tax planning issues and structures.

Since 2006 Juan Ignacio is an assistant professor of Tax Law and teaches International Taxation at the University of Montevideo. In 2007 he became the local partner for Uruguay of the consulting & transfer pricing firm EnterPricing. He is author and co-author of several articles on domestic and international tax issues. In 2007 he was designated IFA Branch Reporter to the Subject 2 of the Kyoto Congress and he was recently designated to write the Report on Subject 1 of the 2010 Congress in Rome. Juan Ignacio speaks English and German fluently.

Areas of expertise

- Corporate income tax
- Withholding taxes and tax credits
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- Mergers & Acquisitions
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- Expatriate taxation
- Reorganisations
- Tax litigation
- Tax Compliance
- Transfer Pricing
- Tax audits
- VAT



Rob Bossart

34 South Lewis Place - Suite 301
Rockville Centre, New York 11570

Telephone + 1 516 766 4133
Telefax + 1 516 763 2520
E-mail rtbz3@yahoo.com
rob.bossart@corptax.org

Rob is an international tax attorney and CPA. He has extensive experience designing and implementing international tax projects for multinationals and entrepreneurs with products, services, or internet operations. Rob formed his own law practice in 2003 after 2 years as the Co-Chair of Greenberg Traurig's International Tax Law Group and 17 years as an International Tax Partner with Andersen. While at Andersen, he headed the U.S. Northeast Region Transfer Pricing Group and was a member of the Global International Tax Team. Rob holds a Masters in Tax Law (LL.M.) from NYU's Graduate School of Law as well as degrees in economics (Wharton) and accounting (Cornell).

Areas of expertise

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Marc Schwartz

5909 Peachtree Dunwoody Road, Suite 800
Atlanta GA 30328

Telephone + I 404 236 9829
Telefax + I 404 549 4114
E-mail mschwartz@schwartzintl.com
marc.schwartz@corptax.org

Marc Schwartz has lived and worked in the US and abroad in both governmental and private sector roles. His diversified experience has allowed him to bring a global perspective to the business. He holds a B.A. from Colgate University, a Master's in International Affairs from Columbia University, and a law degree from Emory University. He is also a CPA.

Marc began his career at the Big 6 in his hometown of Atlanta, Georgia. Here he built a strong foundation in federal, state/local and international tax over several years for both individual and corporate clients. He transferred to the firm's Mexico City office and developed an expertise in Latin American tax to supplement his European, Asian and U.S. tax base. He built on this experience when he was sent to help develop the firm's Miami-based business. In Miami, he developed additional experience with inbound investment to the US.

Marc's geographically diverse client base has allowed him to gain significant experience with tax treaties, outbound/inbound planning, repatriation, foreign tax credits, real estate investments/FIRPTA, branch taxes and audit defense. He has taught a graduate level international tax course at the Universidad Panamericana in Mexico City. Today he continues to lecture on international tax issues, and he also writes for various trade publications. Marc is fluent in Spanish.

Areas of expertise

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Paul Tadros

5909 Peachtree Dunwoody Road, Suite 800
Atlanta GA 30328

Telephone + 905 420 8658
Telefax + 905 421 9697
E-mail ptadros@schwartzintl.com
paul.tadros@corptax.org

Paul lived and worked in a variety of different countries throughout his life. He holds a MSc in Applied Mathematics and Physics, as well as an LLM in tax. In addition, he is a CPA and a Chartered Accountant (Canada). He provides three decades of both industry and large public accounting experience. During his roughly 20 years working in industry, Paul managed the international tax functions of two US-based multinational companies with operations in the Americas, Europe and Asia. In addition, as a partner in the Big 4, Paul worked in Montreal and the Caribbean as a specialist in practical US inbound and outbound tax planning.

Paul maintains a profound depth of knowledge in US inbound and outbound planning. He has extensive experience in cross border mergers and acquisitions, reorganizations, corporate structuring, financing and initial public offerings. He is respected around the world for his extensive knowledge of income tax treaties, and he has consulted with foreign governments on treaty policy and legislation affecting international tax and business issues. Paul is a frequent speaker at international tax conferences and has authored numerous articles on international tax issues. In addition to a broad base of European and Asian experience, a particular specialty of his is the tax systems of Latin America and the Caribbean. He also founded and became the first President of The American Chamber of Commerce in the Eastern Caribbean.

Areas of expertise

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Corporate Tax Alliance



President Kennedylaan 19
2517 JK The Hague
+ 31 (0)70-365 6617

www.corptax.org