

SUPSI

US and EU at the verge of a new tax system

US, EU and Swiss International Taxation – Trends and Recent Developments

Dates & Times

Monday
November 25, 2019
10.00-14.00

Networking
Lunch offered

Location

Room 1144
Stabile Suglio
Via Cantonale 18
6928 Manno

Digitalization is a phenomenon having a large impact on the worldwide tax system. Addressing this issue from different perspectives, it could be possible to have a general overview of new standards laid down by the OECD and the international community. During the seminar H. David Rosenbloom will present "A View from the United States". Prof. Giuseppe Marino will offer comments on Mr. Rosenbloom's presentation from Italian and European perspectives. Joseph Czajkowski will add considerations on inbound and outbound issues relevant for MNE's. Peter Altenburger will outline the recent ratification of the Protocol amending the Swiss U.S. DTC.

Once again, we have the pleasure to host David H. Rosembloom, Director of the International Tax Program at NYU and Partner at Caplin & Drysdale in Washington, DC (former International Tax Counsel at the U.S. Treasury Department) at SUPSI. His presentation will address the issue of digitalization accordingly to a wider perspective: at the brink of a new international tax system addressing the taxation of a digitalized economy, everything is possible. The OECD will release within this year an outline for a new worldwide digital tax planning.

On the other hand, Prof. Giuseppe Marino, will underline the most important issues and the current positions from EU and Italy, approaching the questions arised in a comparative perspective.

As also in the past, Joseph Czajkowski (former Senior Tax Counsel at Exxon Mobil Corporation) will discuss U.S. outbound and inbound issues which represent key points for MNEs, all in the context of the sweeping changes enacted in the 2017 TCJA. Finally, Peter R. Altenburger will discuss the recent U.S. approval of the 2009 Protocol amending the U.S-Swiss Double Taxation Convention.

Program

10.30 **A View from the U.S**

H. David Rosenbloom, Director of International Tax Program, New York University, and Partner at Caplin & Drysdale, Washington, DC

11.15 **Comments from EU and Italian Perspectives**

Giuseppe Marino, Prof., University of Milan.

12.00 **Break and Networking Lunch offered**

12.40 **Outbound and Inbound Issues Affecting MNEs After 2017 TCJA**

Joseph Czajkowski, Former Senior Tax Counsel, Exxon Mobil Corporation, Irving, Texas

13.20 **U.S. Senate's Acceptance of the 2009 Protocol Amending the U.S.-Swiss DTC**

Peter R. Altenburger, Attorney at Law, Zurich and Lugano

Target

Fiduciaries, accountants, lawyers and notaries, tax consultants, bank and insurance consultants, business managers, professionals involved in tax matters for private and public institutions, people interested in taxation

Tuition fee

Free. Registration required

Registration deadline

Tuesday November 19, 2019

Certificate of attendance

A certificate of attendance will be issued only upon request

Administrative Information

SUPSI, Tax Law Competence Centre
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Registration deadline:

Tuesday November 19, 2019

By Post

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Company/Authority	Street
Postal Code	City
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