



## A Global Analysis of Tax Treaty Disputes

Conference Programme

30-31 October 2015

London School of Economics — Department of Law  
Moot Court Room, New Academic Building, 7th Floor  
54 Lincoln's Inn Fields, WC2A 3LJ, London

### Friday, 30 October

- 08.45-09.15 *Coffee, Moot Court Room, 7<sup>th</sup> Floor, New Academic Building*  
09.15-09.20 Welcoming Words: Professor Jeremy Horder, Head of the Department of Law and Visiting Professor John Avery Jones
- 09.25-09.35 **Japan Chapter:** Toshio Miyatake, Adachi, Henderson, Miyatake & Fuyita, Tokio  
09.35-09.50 Discussant: Philip Baker QC, Field Court Tax Chambers, London  
09.50-09.55 Q&A  
09.55-10.05 **Germany Chapter:** Werner Haslehner, University of Luxembourg  
10.05-10.20 Discussant: Stef van Weeghel, University of Amsterdam  
10.20-10.25 Q&A  
10.25-10.35 **Singapore Chapter:** Stephen Phua, National University of Singapore  
10.35-10.50 Discussant: Christiana HJI Panayi, Queen Mary University of London and Emer Hunt, University College Dublin  
10.50-10.55 Q&A
- 10.55-11.15 *Coffee*  
11.15-11.25 **China Chapter:** Peter Ni, Zhong Lun Law Firm, Shanghai  
11.25-11.40 Discussant: Peter A. Barnes, Duke University and Caplin & Drysdale Law Firm, Washington  
11.40-11.45 Q&A  
11.40-12.05 **Canada Chapter and Big Data and Tax Haven Secrecy**  
Arthur Cockfield, Queen's University, Canada  
Discussion in writing by Professor Jinyan Li, Osgode Hall Law School, Canada  
12.05-12.10 Q&A
- 12.10-14.00** *Lunch (Senior Dining Room, 5<sup>th</sup> Floor, Main Building)*
- 14.00-14.10 **The Netherlands Chapter:** Kees van Raad, Leiden University  
14.10-14.25 Discussant: Reuven Avi-Yonah, Michigan University  
14.25-14.30 Q&A  
14.30-14.40 **Switzerland Chapter:** Robert Danon, University of Lausanne  
14.40-14.55 Discussant: Diane Ring, Boston College  
14.55-15.00 Q&A
- 15.00-15.30 *Coffee*  
15.30-15.40 **Ireland Chapter:** Emer Hunt, University College Dublin  
15.40-15.55 Discussant: Arthur Cockfield, Queen's University, Canada  
15.55-16.00 Q&A  
16.00-16.10 **France Chapter:** Jérôme Monsenego, Uppsala University, Sweden  
16.10-16.25 Discussant: Daniel Gutmann, University of Paris I  
16.25-16.30 Q&A
- 16.30-16.40 *Coffee*  
16.40-16.50 **Kingdom of Saudi Arabia:** Ehtisham Ahmad, LSE  
16.50-17.05 Discussant: Victor Thurnoyi, former Senior Counsel (Tax), International Monetary Fund  
17.05-17.10 Q&A  
17.10-17.20 **Russia Chapter:** Irina Dmitrieva, White & Case, Moscow, Russian Federation  
17.20-17.35 Discussant: Jérôme Monsenego, Uppsala University, Sweden  
17.35-17.40 Q&A
- 19.30 **Dinner** at Coopers Restaurant, Lincoln's Inn Fields

## Programme – Saturday, 31 October

Moot Court Room, 7<sup>th</sup> Floor, New Academic Building

09.00-09.10	<b>Tax Treaty Disputes: The Central Global Issues:</b> Eduardo Baistrocchi (EB), LSE
09.10-09.25	Discussant: Ian Roxan, LSE
09.25-09.30	Q&A
09.30-09.40	<b>Australia Chapter:</b> Micah Burch, University of Sydney
09.40-09.55	Discussant: Richard Vann, University of Sydney
09.55-10.00	Q&A
10.00-10.10	<b>Italy Chapter:</b> Carlo Garbarino, Bocconi University, Milano
10.10-10.25	Discussant: Pasquale Pistone, Vienna University, Vienna
10.25-10.30	Q&A
10.30-11.00	<i>Coffee</i>
11.00-11.10	<b>South Korea Chapter:</b> Chang Hee Lee, Seoul National University and Sunyoung Kim, Deloitte Anjin
11.10-11.25	Discussant: Yoshihiro Masui, University of Tokio
11.25-11.30	Q&A
11.30-11.40	<b>India Chapter:</b> Aseem Chawla, MPC Legal, New Delhi
11.40-11.55	Discussant: Ji-Hyun Yoon, Seoul National University
11.55-12.00	Q&A
12.00-12.10	<b>Indonesia Chapter:</b> Freddy Karyadi, ABNR, Jakarta
12.10-12.25	Discussant: Eduardo Baistrocchi (EB), LSE
12.25-12.30	Q&A
12:30-14:00	<i>Lunch (Sofra Restaurant)</i>
14:00-14:10	<b>Brazil Chapter:</b> Joao Dacio Rolim and Isabel Calich, FGV Direito Sao Paulo
14.10-14:25	Discussant: David Rosenbloom, New York University
14.25-14.30	Q&A
14:35-14.45	<b>Chile Chapter:</b> Ricardo Escobar, former head of the Chilean Tax Administration
14.45-15.00	Discussants: Michael Littlewood, University of Auckland and EB, LSE
15.00-15.05	Q&A
15.05-15.20	Coffee
15.20-15.40	Book Presentation <i>Proportionality and Fair Taxation</i> by Joao Dacio Rolim
15.40-15.45	Q&A
15.45-15.55	<b>Mexico Chapter:</b> Oscar Echenique and Jorge Correa
15:55-16:10	Presentation and discussion: Manuel Tron, former President of the International Fiscal Association
16.10-16.20	Q&A
16:20-16:30	<b>United States Chapter:</b> Yariv Brauner, University of Florida
16:30-16:45	Discussant: Edward Barret (OECD)
16.45-17.00	<i>Coffee</i>
	<b>A Global Analysis</b>
17:00-17.10	<b>Tax Treaty Disputes: A Global Quantitative Analysis</b> – EB and M Hearson, LSE
17:10-16:25	Discussant: Pablo Ibáñez Colomo, LSE
16.25-16.30	Q&A
17:05-17:15	<b>The International Tax Regime and the G20 World: Theory and Implications.</b> EB, LSE
17.15-17:30	Discussant: Tsilly Dagan, Bar Ilan University, Israel
17.30-17.35	Q&A
17:35-17:40	Concluding Thoughts – EB, LSE
20:30	<i>Dinner (Browns Restaurant, Covent Garden)</i>

### Chapters to be discussed in writing only

**Argentina Chapter:** Manuel Benites, Perez Alati, Grondona, Benites, Arnsten and Martínez de Hoz, Buenos Aires  
Discussant: Micah Burch, University of Sydney

**Cyprus Chapter:** Christiana Panayi, Queen Mary University of London and Margarita Liassi, KPMG Cyprus  
Discussant: Irina Dmitrieva, White & Case, Moscow, Russian Federation

**Tax Disputes and the European Union Arbitration Convention:** Georg Kofler, Johannes Kepler University of Linz, Austria  
Discussant: Werner Haslehner, University of Luxembourg

**Tax Treaty Disputes in Ghana and Uganda:** Annet Wanyana Oguttu, University of South Africa  
Discussants: Ernie Lai King, Hogan Lovells, Johannesburg

**Hong Kong Chapter:** Michael Littlewood, University of Auckland  
Discussant: Jinyan Li, Osgode Hall Law School, Canada

**Tax Treaty Disputes in Turkey:** Billur Yalti, Koc University Law School in Istanbul  
Discussant: Aseem Chawla, MPC Legal, New Delhi

**Tax Treaty Disputes in the United Kingdom:** Timothy Lyons QC, 39 Essex Chambers, London and Jason Whiston, HMRC  
Discussant: EB, LSE ---