

MINUTES OF THE MEETING OF THE  
DIRECTORS OF IATJ – OCTOBER 17, 2012  
5:30 p.m. at Wirtshaus Kuchlverzeichnis  
Rosenheimer Str. 10, 81669 Munchen

In attendance:

Associate Chief Justice Eugene P. Rossiter, Tax Court of Canada; M. Philippe Martin, Conseil d'État, France; Friederike Grube, Richterin am Bundesfinanzhof, Germany; Judge Willem F.G.Wijnen, Court of Appeal of 's-Hertogenbosch, The Netherlands; Judge Manuel Garzón, Supreme Court of Spain; Counselor João Francisco Bianco, Administrative Council of Fiscal Appeals, Brazil; Justice Clement Endresen; The Supreme Court of Norway;

Also in attendance by invitation:

Judge Ulrich Shallmoser and Judge Patrick Boyle

Regrets: Dr. Manuel Luciano Hallivis Pelayo, Tribunal Federal de Justicia Fiscal y Administrativa, Mexico; Judge Dagmara Dominik-Oginska, Voivodship Administrative Court in Wroclaw, Poland; Judge Virgilijus Valencius, Lithuania; Justice Richard Edmonds, Federal Court of Australia; Judge Bernard Peeters, Belgium, Justice Peter J. Panuthos, U.S. Tax Court; Pramod Kumar, Income Tax Appellate Tribunal, India; Brahim Zaim, President, Supreme Court Morocco.

1. Agenda:

The agenda proposed was adopted as presented.

2. Minutes of Meeting of September 28, 2012:

The Minutes of the Meeting of the Executive and Board of Directors held September 28, 2012 were approved as circulated.

3. Budget Report:

The Chair reviewed the budget report to be presented at the IATJ 3<sup>rd</sup> Assembly, with an explanation for each item and any expected variance with respect to same as per the attached. There was a discussion with

respect to memberships generally and it was emphasized that we generally agreed to expand our membership as much as possible. Prospective members should find membership in the IATJ as attractive in order to encourage membership.

The IATJ is to make a particular effort in Indonesia and Thailand as well as Italy and Austria in an attempt to expand the membership of the IATJ.

4. Financial Report:

A report was given of the bank account status as of September 30, 2012. There was a detailed explanation given with respect to bank fees, signing authority, final accounts from the 2<sup>nd</sup> Assembly, travel expenses and the bank balance. There was a discussion about possible use of excessive funds including possibly sponsorship of Court's activities or reduction of fees for Assemblies. It was also thought that some monies might be used to have lectures given by the IATJ members in developing countries. All of these aspects will be discussed in the future.

5. Web Site:

Discussion with respect to the website and what was to be done in the future, including the following:

- (a) updating the website in terms of membership on at least a quarterly basis;
- (b) report to Judge Wijnen as to memberships for the IBFD access to database on a regular basis, that is, at least quarterly;
- (c) an annual summary of promising cases from each country on international taxation and treaty issues and the Euro issues. It was discussed that members could be designated from each country to provide to the IATJ, on annual basis, a summary of the cases from their country or region on international taxation and treaties issues and the Euro zone tax issues.

6. Newsletter:

It was agreed that we would try to put our four issues of the newsletter annually.

7. President's Annual Report:

There was a brief discussion with respect to the President's Annual Report which was basically the same as the summary of the Executive Committee minutes.

8. 4th Assembly:

At the 3<sup>rd</sup> Assembly there is to be a resolution with respect to the holding of the 4<sup>th</sup> Assembly in 2013, location to be in Amsterdam with a date to be post the IFA conference on August 29, 30 and 31, 2013.

9. Nomination Committee Report:

With respect to nominations, a draft report was discussed with recommendations from each Board member. The report will be presented to the 3<sup>rd</sup> Assembly by the Chair.

10. Future Assemblies:

There was discussion with respect to future locations for the IATJ Assemblies and those include the following:

2013	Amsterdam, The Netherlands
2014	Washington, D.C.
2015	Basil, Switzerland
2016	Madrid, Spain
2017	Rio de Janeiro, Brazil
2018	London, England
2019	Seoul, Korea

It was expected that the only time the IATJ would not be following the IFA conference in the next seven years would be 2014 when the IFA conference was going to be in Mumbai, India.

11. Interim Directorate:

After discussion, it was decided that the interim directorate would continue to remain with the Tax Court of Canada for the time being until the Executive otherwise decides.

12. The IBDT International Tax Symposium:

Judge Bianco advised that the IBDT is to hold an international tax seminar in April, 2013 where there will be four panels per day over a period of two days in San Paolo, Brazil. It is an IFA sponsored conference and they wanted the IATJ to do a panel. It was generally agreed that the IATJ would participate in a panel at this conference.

There being no further business, the meeting was duly adjourned.