

PRESIDENT'S REPORT
October 18, 2012 – Munich, Germany
IATJ 3rd Assembly

Initial Meeting:

1. The President of the IATJ welcomed everyone to the 3rd Assembly and introduced the Executive of the IATJ.
2. A report was given with respect to the membership of the IATJ, being approximately 60 individual memberships and 2 court memberships (comprised of greater than 20 judges each) representing a total of 40 countries.
3. A special welcome was given to new members from new countries.
4. The President commented that it was difficult economic times for everyone worldwide and that the attendance to the IATJ 3rd Assembly was a testament of the attendees' continued support.

Reconvened Meeting:

5. The President stated that in the past year the membership of the IATJ was 115 from 40 countries with the number of attendees for the Assembly being 42. He reviewed a number of the newsletters presented to the membership in the last year as well as discussed the maintenance and ongoing operation of the website. The President explained the attempts to expand membership. He made a comprehensive financial report and reviewed the financial status of the IATJ for the year.
6. In terms of plans for the future, the President advised the following:
 - (a) he hopes to expand the membership, particularly in the area of Asia and the Pacific Rim;
 - (b) in terms of the website, there is going to be a section on the website of significant cases by jurisdiction on international tax and Euro-issues, including treaties;

- (c) participation by IATJ members in international tax sessions over two days, on a panel in San Paolo, Brazil being sponsored by the IBDD with Judge Bianco, a member of our Board of Directors, being involved;
- (d) solidify what has been achieved by the IATJ to date for the benefit of all.

7. Special thanks were presented to the Executive and all who have given support to the interim directorate in organizing the affairs of the IATJ. There was also special thanks given to Judge Grube and her committee for the tremendous organizational effort they put into the 3rd Assembly with thanks given to Dr. Ulrich Shallmoser and Justice Patrick Boyle for their co-chairing the program. Special thanks was also given to the liaison officer, Mary MacMillan for quarterbacking the communications with the IATJ's worldwide members and other aspects of the IATJ. There was also thanks to those who have pitched in on different aspects of the program.

8. Special recognition to Judge Peter Panuthos in relation to his being awarded the Judge Edgar Murdoch Award. Also recognition to Judge Dagmara Dominik-Oginska from Poland on her PhD thesis which she has completed, and on her receipt of an award from the European Court on a spectacular decision on a tax related matter.

9. There was also an announcement with respect to the appointment of Judge Pelayo as Vice-President of the Latin American Institute of Tax Law and the fact that hopefully the IATJ will be able to participate in the IFA 5th Latin American Regional Tax Meeting.

10. At the meeting it was moved and unanimously seconded that the budget/financial statements for 2012 were approved, as well as the financial status report as presented.

11. Resolution that the interim directorate for the IATJ remain at the Tax Court of Canada until the Board of Directors otherwise decides for administration purposes was adopted.

12. There was an issue raised regarding the possibility of having a summary from each country of significant jurisprudence on international

tax law and issues, treaty issues and Euro-zone issues that may have arisen in the past year sent to the Tax Court of Canada to include in the website and this is to be followed up by the President of the IATJ.

13. The Nomination Committee Report was approved as circulated.

14. Upon a motion made, second and unanimously carried, the location and date for the 4th IATJ Assembly is Amsterdam, The Netherlands, on August 29, 30 or 31, 2013 as the case may be, to follow the IFA conference in Copenhagen.

15. There was an announcement with respect to proposed locations for further IATJ assemblies, that is, the 5th Assembly in 2014 in Washington, D.C., the 6th Assembly in 2015 in Basil, Switzerland, the 7th Assembly in 2016 in Madrid, Spain.

16. Volunteers for newsletter were put forward for the 2012/2013 year: Judge Malcolm Gammie, Judge Anthony Gafoor, Judge Friederike Grube, Judge Philippe Martin.

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