

## A MUSICAL TAX EXPERT AND A MUSICIAN WITH TAX EXPERTISE

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Cristián Gárate (Chile, Full-time 02/03) is a graduate of Santiago College, where he completed the International Baccalaureate (I.B.) with full honors. After that, he attended the Faculty of Law at the University of Chile, one of the most prestigious institutions in South America, where he earned his Juris Doctor (J.D.) with a specialization in taxation, summa cum laude. As a result of his interest in economics, he completed a Postgraduate in Finance and Accounting at the Faculty of Economy and Administration of this same university. In 1996 he was appointed Instructor Professor for macro & microeconomics and corporate taxation for students at the Faculty of Law of the same institution. At the same time, he also practiced as a tax and corporate attorney. With other colleagues,

he founded the tax department of the largest law firm in Chile. He later went on to join a Big Four company. Despite all the above activities, he also completed a career at the Conservatory of Music and obtained a diploma as superior interpreter in Flute and Piano (Jazz). Before departing from South America, he participated in concerts and festivals in the area of classical music and jazz in Argentina, Chile and Brazil. To broaden the scope of his activities, he took the decision to look for international horizons in Europe and targeted Vienna.

the study of international law, because of its LL.M. Program, which offers a serious curriculum and the most prestigious professors. It is also a new hub in Europe for international taxation. On the other hand, the city offers marvellous cultural activities, and specifically the best musical tradition in Europe. Both targets were achieved. In the LL.M., Cristián's objective was to further develop his professional and academic area of expertise from an international viewpoint. After finishing the LL.M., he was nominated by the Scientific



### International Tax Law & Music in Vienna

His two main motivations converged perfectly in Vienna. On the one hand, the city is considered a traditional knowledge-center for

Committee of IFA to work as Research Associate at the IBFD in Amsterdam, under the supervision of Prof. Kees van Raad. The work was facilitated by the resources of the IBFD library and the op-

## *A Musical Tax Expert*

# IN CLASS

portunity of meeting many of the scholars and lawyers involved in international taxation during the IFA Congresses in Sydney and Vienna. As a result of his musical interests, he also took time to continue studying music at the Royal Conservatory of Music in The Hague.

### **Chile, Austria, Holland, Germany**

The work at IFA gave Cristián the opportunity of researching and preparing some of the reports concerning topics that are part of the main panels of discussion during the IFA Congresses. He was able to present the results one of these research topics

to Prof. Wolfgang Schön, director of the Department of International Taxation of the Max Planck Institute in Munich. Shortly afterward, Cristián was invited to complete the research as part of his doctorate studies (Ph.Doc.). This experience was also very enlightening, since it meant that he has been associated with one of the most prestigious research institutions in Europe for all of the sciences. Moreover, he has been working with important scholars and lawyers engaged in different projects concerning international taxation and intellectual property. Here, research is also facilitated by contact with the students

and the resources of the Max Planck Library and Dr. Klaus Vogel Library at the Ludwig Maximilian University. Besides, being near Austria has helped to strengthen his bonds with Prof. Michael Lang and the Institute for Austrian and International Tax Law in Vienna. Nowadays Cristián is continuing his tax research responsibilities and his musical activities. We discovered that one of his new projects is the study of Chinese. Once he finishes his dissertation, we certainly expect him to travel to Asia, where he will probably meet some former LL.M. colleagues who are already working in the area.★

## *Comparative Aspects of CFC Rules*



*Brian Arnold*

**The full time LL.M. program 2005/06** was extremely intensive and covered 37 different facets of International tax. Of all the lectures held during the program, I found the lecture given by Prof. Brian Arnold on "Comparative Aspects of CFC Rules" to be the most interesting. Since I had already taken two detailed courses on CFC legislation, another lecture on the same subject could have proved to be repetitive or boring. On the contrary, Mr. Arnold's lecture turned out to be

most educational. This was because Mr. Arnold concentrated mainly on the application of CFC legislation and provided insightful illustrations involving tax planning devices in the US, Canada and other tax jurisdictions. He retained the interest of the students by encouraging questions, posing complex problems and presenting case studies. The example of a "double dip" by taking advantage of the US "check the box regulations" was appreciated by everyone. The spread of CFC regulations to both developed and developing countries in order to prevent the erosion of their tax bases will mean that the insights provided by Mr. Arnold will be extremely useful in our future careers as tax consultants or tax administrators. In addition, the study material provided is worth keeping for future reference (in

particular the comparative chart of CFC regulations of different countries). ★



**Sanjeev Sharma**  
*(India, Full-time 05/06)*

## *Imprint*

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# ALUMNI

**It was during my study** of international trade at the Prague University of Economics that I realized I was becoming increasingly interested in expanding my knowledge in the area of tax law. Having worked for several years part-time for the tax division of Deloitte, I was offered full-time employment after commencing my studies. It was not an easy decision for me to make to pack up and move to Vienna for almost one year to participate in the LL.M. program. Nevertheless, it turned out to be one of the best decisions I have ever made. Carefully prepared lessons and the experience gained from quality lectures, combined with the diversity of students, all add up to a first-class ticket to the world of international taxation. Advisory work has always at-

**I completed my master's** degree in business administration in 1994 and finished my doctoral thesis in 1999. In 1994, I started to work for a tax advisor in Klagenfurt and in 1998 was appointed as a tax advisor myself. As of 1995, I also became an assistant lecturer on a part-time basis at the University of Klagenfurt. From 2000 to 2003, I had the opportunity to work for the Austrian Ministry of Finance. During this period, I also came in contact with

tracted me. Deloitte enjoys a very high reputation in this area and the accession of Central and Eastern European countries to the European Union has opened new opportunities in the Czech Republic. For me, working for Deloitte at this time was an invaluable experience.

The topics of international taxation and the influence of EC law have also been frequent items on the agenda of the International Tax Committee of the Czech Chamber of Tax Advisors. Many Vienna alumni from the Czech Republic have participated in these interesting and thought-provoking discussions.

The world is continually changing and in post-Enron times practicing tax law for a large accounting firm has become more and more complex. Several international law

international tax cases and so I decided to improve my knowledge in this area by attending the LL.M. program. Although the time schedule of the full-time program is very challenging and intense, I really enjoyed the various weekend courses, which gave us a good overview of the tax systems in other countries, the European tax framework and the problems concerning international taxation. I also enjoyed the company of people with many different nationali-

**From May 4-7, 2006,** the wedding of Sashi Tulsian (India, Full-time 03/04) and Sonal took place in Kolkata/India. For Europeans it was a colorful and spectacular event. The family and guests gathered at Sashi's home and in the temples to undertake religious rituals to propitiate the gods for the wedding or

firms have started to build up their own tax practice in the Czech Republic and other Central European countries. Baker & McKenzie has always been recognized worldwide as a law firm with a specialized tax practice and they naturally wished to expand their practice in the new EU Member States. I viewed my joining Baker & McKenzie as an acknowledgement of my experience gained in international tax law. Close cooperation with tax lawyers from various jurisdictions, as well as attorneys practicing in related areas such as M&A, litigation, IP or corporate law, places me in the perfect position to apply, as well as expand upon, my understanding and knowledge of international tax law. ★

**Pavel Fekar (Czech Republic, Full-time 00/01)**

ties (e.g. Slovenian, Brazilian, Chinese, German, Hungarian, etc.). In 2003, I returned to Klagenfurt and completed my postdoctoral lecture qualification in January 2006. As of March 1, 2006, I teach as a professor at the University of Klagenfurt, Department of Financial Management. For my professional advancement, the knowledge achieved during the LL.M. program was and is still of great value. ★

**Sabine Kanduth-Kristen (Austria, Full-Time 02/03)**

to watch the families of the bridal couple performing, dancing and singing on stage to tell their story. The main ceremony took place on Saturday. Sashi had to ride on a white horse from his home to the bride's hotel; however, as the temperature was about 38 degrees Celsius, Sashi took an air-conditioned car after a

## *A Czech career*



## *Professor of Financial Management*



## *A Wedding in India*

### *To all alumni*

*We cordially invite you to our Annual Meeting 06/07, which will be held on January 12-13, 2007. The detailed and personal invitation is coming soon.*

# MISCELLANEOUS

## A Wedding in India



few meters of horse-back riding. The bride wore a wonderful red and golden sari with elaborate embroidery and golden jewelry. Sashi wore a beige salwar suit with golden embroidery and a turban, and looked like an Indian Maharaja. The hotel in which the ceremony took place was decorated with flowers and a special garden landscape had been planted in front of the entrance to the main hall especially for the wedding. One of the main differences with weddings in other parts of the world was that no alcohol was served. Instead, there was a huge variety of all kinds of food. Further, the atmosphere, the blaze of color and the friendliness of the people



were astonishing. Approximately 3000 people were invited and among them many of Sashi's friends from the LL.M. course 2003/04. Imke Gerdes, Barbara Mair, Daniela Hohenwarter, Koen van

Ende, Maxim Sokolov, Dennis de Jong, Roman Lang and I myself traveled to Kolkata for the unique opportunity of attending this wedding. ★  
**Vanessa Metzler**  
(Austria, Full-time 03/04)

## AT&S supports two Chinese students



René Berger, Director Communications AT&S  
Zibin Zhou, Lingbo Lu, Josef Schuch

**Lingbo Lu and Zibin Zhou** have received support for their study from the Budget Affairs Commission of the Standing Committee of the National People's Congress of China. Since the scholarship for the study program did not cover the travel expenses for the trip to Brussels, the generous support of AT&S allowed both students

to join their classmates and to enjoy a visit to the European Commission. AT&S is market leader in Europe and one of the the world's largest and technically most advanced producers of printed circuit boards. In the high-tech segment of HDI Microvia technology, which is primarily used in hand-held applications, AT&S is per-

fectly positioned. AT&S also operates successfully in the automobile industry and in industrial and medical technologies. As an internationally growing company, AT&S is globally prominent with three production locations in Austria and factories in India, China and Korea, and is happy to support our LL.M. program and its Chinese students. ★

## Applications and Scholarship

**Another full-time course** started in September. A large number of highly qualified students from all around the world applied. Since a picture says more than thousand words, please take a look at the map. Thanks to our partners, ERSTE Bank and Die Presse, it was possible to offer another scholarship for this



year's full-time course. The scholarship amounts to EUR 9,450. Economics, social sciences or law graduates aged

30 or below at the time of application were eligible for the scholarship. The 06/07 scholarship has been awarded to Mr. Stephan Kienberger, 24 years of age, who graduated from Karl-Franzens-University Graz. During his studies, he specialized in tax law and is currently attending a course in accounting. ★

## Academic Ceremony

**The academic ceremony** for the full-time class 05/06 was hosted by the city of Vienna and took place in the old town hall. Twenty-seven (former-) LL.M.

students from all around the world were happy to have finished their studies successfully and to celebrate the graduation with family and friends. ★



Michael Lang and happy students after the ceremony

