

# How Asian-based Hedge Funds Prepare for Implementation of FATCA

July 18, 2013 at 6 PM Hong Kong

FATCA (Foreign Account Tax Compliance Act) creates a new U.S. information reporting regime that will be globally enforced, as of January 1, 2014. FATCA imposes a new 30% U.S. withholding tax on some U.S.-source investment income received by funds. Because offshore (or non-U.S.) hedge funds and their fund managers are deemed foreign financial institutions (FFIs) under FATCA, the new regulation will likely affect offshore hedge funds significantly and also present material future compliance/ implementation challenges, as well as considerations for investor relations.

Hear from FATCA specialists on how most Hong Kong-managed hedge fund managers can prepare for FATCA, including:

- What is the impact of noncompliance with FATCA?
- What are investors' expectations about hedge fund FATCA compliance -- globally and in Asia Pacific?
- What disclosure on FATCA should be added to hedge fund offering materials and investor subscription docs?
- What are the roles of fund service providers in helping a fund prepare for FATCA?

#### **Participants**

Karl Paulson Egbert, Dechert LLP David Weisner, Citigroup Angelica Kwan, *Moderator*, PricewaterhouseCoopers Ltd

## **Event Details**

Date: July 18, 2013

**Time:** 5:30 PM Registration.

We will begin *promptly* at 6 PM; please arrive early. Since it is disruptive to everyone when latecomers enter the session, those arriving after an education session has begun will only be admitted at the discretion of 100WHF and the host. Please note the start time on this invite and plan to arrive early.

Networking and cocktails will follow. **Host:** PricewaterhouseCoopers

Location: PwC Executive Conference Center

21/F, Edinburgh Tower, The Landmark, 15 Queen's Road Central, Hong Kong, Hong Kong

**RSVP**: RSVP Now

If you have any questions about this event, please contact the Asia Pacific committee.

This event is NOT FOR ATTRIBUTION. All 100WHF events are private events and we require that no one reports publicly on any aspect of them.

Admission to this event is free, but there is a 200 HKD charge if you register and do not attend (even if you cancel in advance). No-show proceeds will be donated to our 2013 beneficiary.

If you have no-show fees in arrears, the system cannot register you for an event. You can view and pay for any outstanding no-show fees online from your <u>Member Profile</u>

Space is limited. No walk-ins will be permitted.

## **Biographies**

## Karl Paulson Egbert, National Partner, Dechert LLP

Karl is a registered foreign lawyer in Dechert's Hong Kong office. He is responsible for analyzing the impact of U.S. regulatory developments, such as FATCA, Dodd-Frank, and derivatives reform, on markets and clients outside of the United States. He advises both private and registered funds on regulatory, corporate and business matters. Prior to returning to Hong Kong, Karl practiced in London and Washington, DC, working on a various investment fund and capital markets issues.

Karl received a B.A. from Yale College and a J.D. from the University of Michigan Law School.

#### David Weisner, US Tax Counsel for Asia Pacific, Citigroup

David Weisner is based in Hong Kong and is US Tax Counsel for Asia Pacific for Citigroup. He handles the tax issues for variety of businesses throughout Asia Pacific. Prior to joining Citigroup in 2003, David worked at Fidelity Investments in Boston as international tax counsel. Prior to Fidelity Investments, David worked for White & Case, a New York based law firm, and Deloitte & Touche, a big 4 accounting firm. He is a member of the Illinois Bar.

David is on the executive committee of the Asia Chapter of the Tax Executive Institute (TEI) (and its former President), on the executive committee of the Capital Market Tax Committee (CMTC), on the tax committee for the Hong Kong chapter of Alternative Investment Management Association (AIMA) and leads the FATCA subcommittee for the Hong Kong Association of Banks (HKAB).

#### Angelica Kwan, US Tax Partner, PricewaterhouseCoopers Ltd

Angelica Kwan is a US Tax partner based in Hong Kong and a PwC lead partner in Hong Kong for FATCA.

Angelica returned to Hong Kong in 2011 after having advised clients as a US tax lawyer in New York for 15 years. Prior to joining PwC Hong Kong, Angelica was a US tax partner at Sidley Austin LLP in New York. Angelica has extensive US tax experience with cross-border structuring, M&A deals, and corporate and partnership transactions. Clients range from private equity and hedge funds and their institutional investors, to US and AsiaPac multi-national corporations and leading financial institutions. Angelica has thorough experience meeting the US tax consulting and US tax compliance needs of private equity funds and hedge funds.

Angelica is active as lead tax partner on a number of Hong Kong FATCA engagements and on the AsiaPac portion of global FATCA engagements. These engagements span the banking, asset management, retirement schemes, fund service provider, insurance and brokerage industries.

Angelica holds a J.D. magna cum laude from Harvard Law (1993). She has an MBA from Stanford (1998), where she was an Arjay Miller Scholar. She is a member of the New York and District of Columbia Bar.

## **About PricewaterhouseCoopers**

PricewaterhouseCoopers ("PwC") is the leading professional services firm serving the global asset management industry. PwC brings a unique combination of integrated services to provide valuable knowledge and experience to meet the assurance, advisory and tax needs of asset managers and their funds products and the service providers to the asset management industry including custodians, fund administrators and prime brokers.

In Hong Kong, PwC enjoys the largest client base and team of professional staff dedicated to the asset management industry, consisting of a team of 14 partners and 42 managers dedicated to servicing the asset management industry along with a pool of 150 senior associates and associates. Our professional staffs in Hong Kong work closely with PwC's global network of asset management professional, providing access to extensive industry experience and best practices all over the world.

PwC was awarded the "Best auditor - Funds advice" and/or "Best auditor - Tax services for funds" Service Provider Awards by Asian Investor for 5 consecutive years from 2008.

## About 100 Women in Hedge Funds (www.100womeninhedgefunds.org)

100 Women in Hedge Funds is a global, practitioner-driven non-profit organization serving over 12,000 alternative investment management investors and professionals through educational, professional leverage and philanthropic initiatives. Formed in 2001, 100 Women in Hedge Funds has hosted close to 400 events globally, connected more than 250 senior women through Peer Advisory Groups and raised nearly \$30 million for philanthropic causes in the areas of women's health, education and mentoring.