

4th

Applicable toward CPD Requirement

Cross-Border Personal Tax Planning

Cover all your bases and avoid excess taxation

May 26 & 27, 2015, Toronto

Workshop Included:
Tax Planning for Snowbirds Retiring in U.S.

course highlights

- Cross-border estate planning strategies
- Overview of the U.S. estate tax structure
- Critical tax planning issues for U.S. citizens in Canada
- Latest tax issues affecting non-resident investors in U.S. real property
- The U.S.-Canada tax treaty protocol
- Tax planning for Canada-U.S. employment transfers
- Tax implications of insurance
- Tax planning for your cross-border family business

who should attend

Lawyers in Tax Planning, Lawyers in Estate Planning, Financial Planners, Investment Planners and Tax Accountants who want to expand their knowledge area or keep up-to-date in this field

Speakers & Participating Organizations Two-Day Event!



Course Leader
Jonathan Garbutt,
Dominion Tax Law



Course Leader
Martin J. Rochweg,
Miller Thomson LLP



Ron Choudhury,
Aird and Berlis LLP



Michael Domanski,
**Honigman Miller
Schwartz and Cohn LLP**



Sunita Doobay,
Tax Chambers LLP



Abigail Kan,
**McGovern Hurley
Cunningham LLP**



Greg Kanargelidis,
**Blake Cassels &
Graydon LLP**



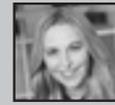
Peter Megoudis,
Deloitte LLP



Sabina Mexis,
Zeifmans LLP



Todd A. Miller,
McMillan LLP



Christine Perry,
Keel Cottrelle LLP



David P. Stevens,
**Gowling Lafleur
Henderson LLP**



Vitaly Timokhov,
Tax Chambers LLP



Jason Ubeika,
BDO Canada LLP



Richard M. Wise,
MNP LLP

COURSE LEADERS

JONATHAN GARBUTT

Jonathan N. Garbutt is a Barrister & Solicitor at **Dominion Tax Law**. He practices all aspects of Canadian income tax law: personal & corporate, planning as well as litigation.

MARTIN J. ROCHWERG

Martin J. Rochweg is a Partner at **Miller Thomson LLP**. He provides advice on tax planning, estate planning, and succession planning to family business, wills and trusts.

CO-LECTURERS

RON CHOUDHURY

Ron Choudhury is a Partner at **Aird and Berlis LLP**. His practice focuses on all aspects of domestic and international tax.

MICHAEL DOMANSKI

Michael W. Domanski is a Partner at **Honigman Miller Schwartz and Cohn LLP**. His practice focuses on international tax matters and alternative risk financing arrangements.

SUNITA DOOBAY

Sunita D. Doobay is a Partner at **TaxChambers LLP**. She has over 20 years of tax experience in tax controversy and has been advising shareholders and their companies on cross-border taxation and succession planning.

ABIGAIL KAN

Abigail Kan is Tax Principal at **McGovern, Hurley, Cunningham, LLP** with over 20 years of tax experience between public practice, industry and the CRA.

GREG KANARGELIDIS

Greg Kanargelidis is a Partner at **Blake Cassels & Graydon LLP**. His practice embraces all areas of international trade, customs and commodity tax.

PETER MEGOUDIS

Peter Megoudis is a Partner with the Global Employer Services Group of **Deloitte LLP**. He has been extensively involved in cross-border personal tax planning for the past 15 years.

SABINA MEXIS

Sabina Mexis is Director of Tax and Estate Planning at **Zeifmans LLP**. She has particular expertise advising on cross-border tax planning and trust and estate planning.

TODD A. MILLER

Todd Miller is a Partner at **McMillan LLP**. His practice focuses on income tax, with an emphasis on domestic and cross-border matters.

CHRISTINE PERRY

Christine Perry is a Partner at **Keel Cottrelle LLP**. Her practice focuses on cross-border tax and estate planning solutions for high net worth individuals.

DAVID P. STEVENS

David Stevens is a Partner at **Gowling Lafleur Henderson LLP**. His practice focuses exclusively on taxation concentrating on corporate tax, personal tax planning and charities.

VITALY TIMOKHOV

Vitaly Timokhov is a Partner, Canadian and Cross-Border Taxation at **TaxChambers LLP**.

JASON UBEIKA

Jason Ubeika is Partner, U.S. Tax at **BDO Canada LLP**. His primary focus is the cross-border taxation of individuals and trusts.

RICHARD M. WISE

Richard Wise is a Partner specializing in business valuation and financial litigation at **MNP LLP**. He has more than 35 years of experience performing valuations for corporate, transactional and taxation purposes.

COURSE PROGRAM

U.S. ESTATE TAX ISSUES FOR CANADIANS: ESTATE PLANNING DESIGN AND DRAFTING

Clients migrating from Canada to the U.S. and vice-versa should be aware of the key differences of each country's tax-purpose valuation policies in each country. This session will address the following subjects:

- Fair market value in Canada vs. Fair market value in U.S.
- CRA valuation policies vs. IRS valuation policies regarding shares in family businesses
- Recent valuation-related Tax Court decisions – Canada and U.S.
- Valuation of a beneficiary's interest in a trust
- Valuation of fractional interests in real estate

TAX PLANNING FOR U.S. CITIZENS IN CANADA

U.S. citizens in Canada must carefully plan their move in order to ensure compliance with relevant laws and requirements. Adding to the complexity to this planning, is that these individuals often retain property or business interests in the U.S. and still have taxation obligations there. This session explores tax issues and planning opportunities for U.S. citizens in Canada.

- Critical tax planning issues for U.S. citizens in Canada
- Avoiding double taxation risks: foreign tax credits issues
- Tax treaty implications
- Disclosure requirements

- *This program can be applied towards 9 of the 12 hours of annual Continuing Professional Development (CPD) required by the Law Society of Upper Canada. Please note that these CPD hours are not accredited for the New Member Requirement.*
- *For Alberta lawyers, consider including this course as a CPD learning activity in your mandatory annual Continuing Professional Development Plan as required by the Law Society of Alberta.*
- *Attendance at this course can be reported as 12 hours of Continuing Professional Development (CPD) to the Law Society of B.C.*
- *The Barreau du Québec automatically accredits training activities held outside the Province of Quebec and accredited by another Law Society which has adopted MCLE for its members*



While nothing compares to the experience of attending the live event, with its enhanced networking opportunities and direct contact with leading experts, for those unable to attend in person FP provides a convenient option to still benefit from this unsurpassed learning experience:

FP's live interactive Webcasts allow you to actively participate in events, from downloading all material distributed by lecturers to asking speakers questions.



TAX EFFECTIVE CROSS-BORDER WILL PLANNING

While many wills are straightforward, there are intricate tax strategies that come into play in cross-border will planning involving beneficiaries, assets, trustees in different jurisdictions. This session covers efficient financial, legal and taxation issues involved in cross-border will drafting and how to ensure you cover all your bases and avoid excess taxation.

- U.S. tax-saving opportunities in will planning
- Tax effectively addressing issues in different jurisdictions
- Changes to U.S. law affecting will planning
- Post mortem impact that U.S. taxes have on estates, trusts and beneficiaries

TAX IMPLICATIONS OF CANADIANS BUYING, SELLING AND RENTING U.S. REAL ESTATE

Non-residents must be aware of the tax consequences of buying selling and renting U.S. real estate in order to take advantage of tax planning opportunities and to avoid paying excess taxes. This session will examine the latest tax issues affecting non-resident investors in U.S. real property.

- Tax rules applicable to non-residents investing in U.S. real estate
- Pros and cons of various ownership structures involving non-residents
- Minimizing tax liability on rental income and capital gains
- Tax considerations for Canadians owning U.S. rental properties
- Estate tax law and U.S. vacation homes

THE U.S.-CANADA TAX TREATY PROTOCOL: IMPACTS & OPPORTUNITIES

The Canada-US Tax Convention has been revised a number of times since 1980. The Fifth Protocol included important changes that affect cross-border estate planning and business structures in such areas as international investment, provision of services and stock options. This presentation will provide an overview of its impact and look at tax planning opportunities in light of these changes.

- Residency and limitations on benefits under the treaty
- Tax consequences of migration
- Exemption of certain income under the treaty
- RRSPs and pensions
- Use of hybrid entities

TRUSTS & ESTATE PLANNING FOR U.S. BENEFICIARIES

The inclusion of one or more beneficiaries who are U.S. citizens or residents further complicates the tax considerations in your estate planning process. This session examines the tax implications for such an arrangement and how to plan for them in order to minimize tax.

- Impact of U.S. beneficiary on the estate freezes
- Implications for Canadian trusts and holding corporations
- U.S. transfer tax and income tax considerations
- Compliance and reporting obligation issues

INSURANCE CHOICES & TAX IMPLICATIONS

Estate and personal tax plans typically do not contemplate the life insurance needs of business owners or high net-worth individuals. This discussion will focus on the design and tax treatment of more innovative insurance programs that can be used in cross-border personal tax planning purposes as well as some of the key cross border tax considerations.

- Life Insurance and U.S. estate tax
- Use of irrevocable life insurance trusts
- Emigrating from Canada with a Canadian issued policy
- Immigrating to Canada with a foreign issued policy
- Life insurance and valuation of private company shares
- Foreign beneficiaries of Canadian policies

CROSS-BORDER EMPLOYMENT TRANSFERS

This session will provide you with an understanding of best practices for facilitating tax compliance and for averting tax problems related to employees on cross-border assignments.

- Designing a tax-effective cross-border employee relocation program
- Tax equalization and tax protection programs
- Tax issues for managing expatriate costs
- Planning compensation for cross border executives (stock-based compensation, employee benefits, deferred compensation programs)
- Payroll compliance issues

IMPORT DUTY AND SALES TAX ISSUES FOR NEW RESIDENTS OF CANADA

When an individual moves to Canada, whether permanently or temporarily, there are a number of customs and commodity tax implications relating to the importation of the new resident's personal effects. This presentation will outline:

- Customs duties and commodity taxes payable on, and other regulatory requirements respecting, the importation of typical personal effects
- Exemptions available to avoid the imposition of customs duties and commodity tax
- Properly structuring the move to achieve positive results
- Considering customs and commodity tax issues in combination with immigration issues
- Special rules that apply to certain types of personal effects

THE CROSS-BORDER CONUNDRUM: CAN CANADIAN INSURANCE CREATE PROBLEMS?

The integration of life insurance and trusts can result in powerful, tax-efficient vehicles for the achievement of estate planning objectives. However, in cross border situations, care must be taken when structuring the ownership and beneficiary designation to ensure the policy will achieve the desired results. This presentation will look at pitfalls in Canadian insurance planning in cross border circumstances.

- When Canadian insurance can create U.S. problems
- Sources of U.S. issues
- Planning considerations to avoid problems
- Canadian tax traps to avoid
- Ownership transfer issues
- Family Law Act treatment of insurance proceeds
- Insurance ownership by trust

WORKSHOP

TAX PLANNING FOR SNOWBIRDS RETIRING IN U.S.

Individuals who are planning a retirement in the U.S. must carefully consider the tax implications of such a move in order to fully benefit from effective tax planning and prevent spoiling their comfortable retirement. This workshop will examine tax planning for retiring in the U.S.

- Departing Canada
- Residency issues
- Tax and cash flow planning for living in the U.S.
- Taxation of retirement income in Canada and the U.S.
- Tax effective investment planning for your retirement investments
- U.S. taxation of RRSPs, RRIFs and LIRAs
- U.S. taxation of pensions
- FBAR - foreign bank and financial accounts

PROCEEDINGS



The "Proceedings" is your Web repository of learning resources for this event. It includes:

- the recording of the lectures at the forthcoming event itself, including documentation, slides and audio-visual;
- 25 or more carefully selected additional lectures (below), which are intended as a recommended enrichment of the course content, with many additional topics covered.

The price of the Proceedings (one user licence) is \$299 if you are attending in person or by Webcast; or \$799 otherwise.

U.S. Estate Tax Issues for Canadians: Estate Planning Design and Drafting

Jim Yager
KPMG LLP

Trusts and Estate Planning for U.S. Beneficiaries

Sabina Mexis
Deloitte & Touche LLP

Canadian & U.S. Expatriation Rules

Peter Megoudis
Deloitte & Touche LLP

Tax Planning for Canadians Opening a Business in the U.S.

Stanley Abraham
The U.S. Tax Group Inc.

International Wealth and Tax Planning

James A. Hutchinson
Miller Thomson LLP

Residency Issues: Qualifying for Canadian Non-Residency

Grace Chow
Cadesky and Associates LLP

Tax planning for New Immigrants and Returning Residents

Lorne H. Saltman
Cassels Brock & Blackwell LLP

U.S. Income Tax Planning: Recent Developments

Chris Chan
PricewaterhouseCoopers LLP

U.S. Complex Filings, Voluntary Disclosures, and Expatriation

Peter Megoudis
Deloitte & Touche LLP

Workshop: Tax Effective Estate Planning for the International Client: Use of Trusts

M. Elena Hoffstein
Fasken Martineau DuMoulin LLP

U.S. Estate Tax Issues for Canadians: Estate Planning Design and Drafting

David P. Stevens
Gowling Lafleur Henderson LLP

U.S. Gift Tax Regime: New U.S. Tax Rules Impacting Gift Tax Planning

Michael Pereira
KPMG LLP

Tax-Effective Cross-Border Will Planning

Rahul Sharma
Miller Thomson LLP

Tax Implications of Canadians Buying, Selling and Renting U.S. Real Estate

Greg Papinko
PricewaterhouseCoopers LLP

Canadian & U.S. Expatriation Rules

Kristina Soutar
Thorsteinssons LLP

Trusts and Estate Planning for U.S. Beneficiaries

Christine Perry
Keel Cottrelle LLP

The Cross-Border Conundrum: Can Canadian Insurance Create Problems?

Glenn M. Davis
Glenn M Davis Insurance and Estate Consulting

Insurance Choices & Their Tax Implications

Joël Campagna
Manulife Financial

Workshop: Tax Planning for Snowbirds Retiring in the U.S.

Alpesh Joshi
Alpesh Joshi CA Professional Corporation

Tax Planning for Canadians Opening a Business in the U.S.

Dan Lundenberg
Grant Thornton LLP

The Canada-U.S. Tax Convention

Michael W. Domanski
Honigman Miller Schwartz and Cohn LLP

International Wealth & Tax Planning

Peter C. Myers
PricewaterhouseCoopers LLP

Incorporating a Holistic Approach to Income Splitting

Don Nilson
Nilson & Company AFT TRIVEST Management Inc.

The Use of Trusts in Estate Planning

Nicolas P. Smith
Legacy Tax + Trust Lawyers

Principal Tax Considerations in Business Succession Alternatives

Michael C. Morgan
Chappell Partners LLP

Registration: To reserve your place, call Federated Press toll-free at 1-800-363-0722. In Toronto, call (416) 665-6868 or fax to (416) 665-7733. Then mail your payment along with the registration form. Places are limited. Your reservation will be confirmed before the course.

Location: Courtyard by Marriott Downtown Toronto, 475 Yonge Street, Toronto, ON, M4Y 1X7

Conditions: Registration covers attendance for one person, the supplementary course material as described in this document, lunch on both days, morning coffee on both days and refreshments during all breaks. The proceedings of the course will be captured on audio or video.

Time: This course is a two-day event. Registration begins at 8:00 a.m. The morning sessions start promptly at 9:00. The second day ends at 5:00 p.m.

Cancellation: Please note that non-attendance at the course does not entitle the registrant to a refund. In the event that a registrant becomes unable to attend following the deadline for cancellation, a substitute attendee may be delegated. Please notify Federated Press of any changes as soon as possible. Federated Press assumes no liability for changes in program content or speakers. A full refund of the attendance fee less 15% administration fee will be provided upon cancellation in writing received prior to May 12, 2015. No refunds will be issued after this date.

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Payment must be received prior to May 19, 2015

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TO REGISTER FOR 4TH CROSS-BORDER PERSONAL TAX PLANNING

Name _____
 Title _____ Department _____
 Approving Manager Name _____
 Approving Manager Title _____
 Organization _____
 Address _____
 City _____ Province _____ Postal Code _____
 Telephone _____ Fax _____ e-mail _____
 Please bill my credit card: AMEX VISA Mastercard
 # _____ Expiration date: ____ / ____
 Signature : _____
 Payment enclosed: Please invoice. PO Number: _____

REGISTRATION COSTS

NUMBER OF PARTICIPANTS:
 COURSE: \$1975
 WEBCAST: \$1575*
 * One user licence
 COURSE + PROCEEDINGS:
 \$1975 + \$299 = \$2274
 WEBCAST + PROCEEDINGS: \$1874
 PROCEEDINGS: \$799*
 * One user licence
 NOTE: Please add 13% HST to all prices.
 Proceedings will be available 60 days after the course takes place
 Enclose your cheque payable to Federated Press in the amount of:

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