

Applicable toward CPD Requirement

Two-Day Event!

course highlights

- Hear from Canada's foremost personal tax and estate planning experts as they discuss:
- Strategies for using trusts to protect accumulated wealth in a tax efficient fashion
- The latest judicial decisions, CRA rulings and other pronouncements
- Most current developments in tax law pertaining to owner-managers and examine tax planning strategies in light of these tax changes
- The interplay between family and estate law and how it impacts estate planning for couples
- The latest insight on the tax and financial considerations of creative charitable techniques

who should attend

Lawyers in Tax Planning, Lawyers in Estate Planning, Financial Planners, Investment Planners

participating organizations

Aird & Berlis LLP
Davies Ward Phillips & Vineberg LLP
Fasken Martineau DuMoulin LLP
Gowling Lafleur Henderson LLP
Glenn M. Davis Insurance and Estate Consulting
Manulife Financial
Miller Thomson LLP
MNP LLP
Simpson Wigle LLP
TaxChambers LLP

September 11 & 12, 2014, Toronto

15th

Tax Planning for the Wealthy Family

Cover all the bases for estate planning and avoid excess taxation

**Workshop Included:
International Wealth and Tax Planning**



Course Leader
Michael Morgan,
Simpson Wigle
LLP



Course Leader
Martin J. Rochweg,
Miller Thomson
LLP



Hemal Balsara,
Manulife
Financial



Ron Choudhury,
Aird & Berlis
LLP



Glenn M. Davis,
Insurance,
Trust and Estate
Consulting



Elie Roth,
Davies Ward
Phillips &
Vineberg LLP



David P. Stevens,
Gowling Lafleur
Henderson LLP



Richard M. Wise,
MNP LLP



M. Elena Hoffstein,
Fasken
Martineau
DuMoulin LLP



Sunita D. Doobay,
TaxChambers
LLP



COURSE LEADERS

MICHAEL MORGAN

Michael Morgan is a Counsel at **Simpson Wigle Law LLP**. He is an accomplished tax lawyer, providing tax planning and estate planning advice, as well as tax dispute resolution advice, to individual and corporate clients including owner-operated private companies and family businesses.

MARTIN J. ROCHWERG

Martin Rochweg is a Senior Tax Partner within the Tax and Private Client Services group at **Miller Thomson LLP**. He advises trustees and beneficiaries on estate, trust and charitable administration and dispute resolution, and corporate clients on tax minimization and ownership regimes.

CO-LECTURERS

HEMAL BALSARA

Hemal Balsara is Assistant Vice-President, Tax & Estate Planning at **Manulife Financial**. His experience includes researching and analyzing complicated technical tax issues including various tax structuring and estate planning issues, dealing with owner manager situations and various corporate and personal tax issues.

RON CHOUDHURY

Ron Choudhury is a Partner at **Aird & Berlis LLP**. His practice focuses on all aspects of domestic and international tax. He advises on owner-manager tax issues, executive compensation, residency issues, estate freezes and succession planning.

GLENN M. DAVIS

Glenn M. Davis is Trust and Estate Planning Consultant at **Glenn M. Davis Insurance and Estate Consulting**. He is non-practicing lawyer who conducts an independent insurance, trust and estate planning practice.

SUNITA D. DOOBAY

Sunita D. Doobay is a Partner at **TaxChambers LLP**.

M. ELENA HOFFSTEIN

M. Elena Hoffstein is a Partner at **Fasken Martineau DuMoulin LLP**. She is engaged in personal tax and estate planning, family business succession planning, wills and trusts.

ELIE ROTH

Elie Roth is a Partner at **Davies Ward Phillips & Vineberg LLP**. His practice concentrates on all aspects of domestic and international tax planning, corporate reorganizations, mergers and acquisitions and corporate finance.

DAVID P. STEVENS

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

RICHARD M. WISE

Richard M. Wise is a Partner at **MNP LLP**. He has more than 35 years of experience performing valuations for corporate, transactional and taxation purposes as well as damage quantification.

COURSE PROGRAM

TAX-EFFICIENT USE OF LIFE INSURANCE

Estate plans often do not contemplate or properly integrate the use of life insurance with the needs of business owners or high net-worth individuals. This discussion will focus on the effective use of life insurance in tax and estate planning.

- Transferring ownership of life insurance
- Using insurance to reduce tax on death
- Business succession Insurance
- Donation strategies

USE OF TRUSTS IN ESTATE PLANNING

Uncertainty regarding the specific type of trust to establish, or not considering the impact of recent tax legislative amendments and tax litigation, could expose a family or an estate to unanticipated tax liabilities. This session will examine strategies for using trusts to protect accumulated wealth in a tax-effective manner.

- Types of trusts used for estate planning
- Key estate planning opportunities using trusts
- Potential for income-splitting
- Income attribution rules
- Use of trusts for probate tax planning
- Alter ego trusts and joint partner trusts
- Structuring trusts in the context of an estate freeze
- Intra-family wealth preservation strategies

webcast 

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.

- 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 11 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

CHARITABLE GIFT PLANNING

In recent years, there have been many developments in the area of charitable gift planning and registered charities. This session will review the current developments relating to high net-worth individuals and families, focusing on the tax and financial considerations of creative charitable techniques.

- Timing and structure of gifts to maximize tax credits
- Ensuring the credit is where it provides the greatest benefit
- Charitable remainder trusts
- Private foundations & donor-advised funds
- New DQ rules: a shifting landscape
- What is fundraising and why it matters
- Charitable tax shelters and flow-through vehicles
- Leveraged gifting arrangements

SUCCESSION PLANNING IN THE FAMILY LAW CONTEXT

Business succession within a family requires a well-organized and well-communicated plan to effectively deal with tax and legal issues that can arise on a transfer of ownership from one generation to another, including family law considerations and issues surrounding family harmony. This session will identify the issues and consider potential solutions.

- Reorganizing the corporation to separate business assets from investment assets
- Freezing the value of the interests of the existing owners
- Using trusts to permit flexibility
- Family law considerations and the use of marriage contracts
- Drafting shareholders agreements that are consistent with a succession plan
- Separating succession of ownership and succession of management

POSTMORTEM TAX PLANNING STRATEGIES

Understanding the different postmortem tax strategies available is an important way to avoid excessive taxation and protect estate assets. This session will look at the different techniques to minimize tax owing after death.

- Postmortem impact that taxes have on estates, trusts & beneficiaries
- Disclaiming bequests
- Unified credit
- Basis adjustments
- Election on stock valuations
- Charitable contributions
- Retirement plan distributions
- Loss carryback & pipeline planning

IMMIGRATION & EMIGRATION ISSUES

Whether moving from Canada to the U.S. or immigration from the U.S. to Canada, there is a wide range of personal tax and estate planning issues to consider. This session will focus on these immigration and emigration issues:

- Emigration issues
- Residency basics and termination issues
- Treaty tie-breaker clauses & deemed disposition
- Principal residence & stop-loss rule
- Posting security & pre-departure planning
- Pensions/retirement plans for immigrants from the U.S.
- U.S. gift tax issues in Canada
- Planning for LLC shareholdings

INSURANCE CHOICES AND THEIR TAX IMPLICATIONS

With such a wide range of life insurance products available, it is often difficult to understand what they all mean and how they will affect tax planning, including possible cross-border aspects. This presentation will look at what life insurance alternatives are offered and what they imply for different circumstances.

- What types of insurance products are available
- What products are best suited to what insurance needs
- What are the tax consequences of each product choice
- How can the tax benefits of life insurance be maximized

VALUATIONS IN ESTATE PLANNING — AVOIDING LITIGATION AMONG FAMILY MEMBERS

What happens when all your planning goes wrong because of totally unforeseen events? What can you do to prevent litigation among family members before it even begins? This session covers recent cases of importance and will suggest steps that can be taken by the testator and his or her advisors to protect the family's business as well as other family assets.

- Control vs. minority interests
- Shareholder buy-sell agreements
- Shareholder appraisal remedies: dissent and oppression
- Valuation of beneficiaries' capital and income interests in a trust

WORKSHOP

INTERNATIONAL WEALTH AND TAX PLANNING

The internationalization of the global economy has increased the complexity of tax planning and wealth management. This session will address the challenges of international wealth and tax planning, concentrating on the theoretical and practical aspects of international taxation with regards to the wealth of private individuals and families.

- International wealth planning opportunities and their pitfalls
- International taxation principles and their application
- Treatment of multiple residencies
- Gifts and inheritance across borders

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.

The Use of Trusts in Estate Planning

Laura E. West
Fasken Martineau DuMoulin LLP

Succession Planning in the Family Law Context

Clare A. Sullivan
Aird & Berlis LLP

Trusts and Estate Planning for U.S. Beneficiaries

Christine Perry
Keel Cottrelle LLP

Taxation of Investment & Retirement Income

Fred Purkey
Davies Ward Phillips & Vineberg LLP

Insurance Choices and Their Tax Implications

Kevin Wark
CALU (Conference for Advanced Life Underwriting)

Wills: Litigation

Brian E. Cohen
Fraser Milner Casgrain LLP

International Wealth and Tax Planning

James A. Hutchinson
Miller Thomson LLP

Business Succession Planning

Alison Oxtoby
BMO Harris Private Banking

Postmortem Tax Planning Strategies

Kay E. Gray
Grant Thornton LLP

Tax-Efficient Use of Life Insurance

Clay Gillespie
Rogers Group Financial

Cross-Border Estate Planning

Will Todd
Davis LLP

Charitable Gift Planning

Richard Bell
Blake, Cassels & Graydon LLP

Estate Planning Litigation

Hugh S. McLellan
McLellan Herbert Barristers & Solicitors

Incorporating a Holistic Approach to Income Splitting

Don Nilson
Nilson & Company AFT TRIVEST Management Inc.

Owner Manager Tax Planning

Gord Squire
Squire Law Firm

Wills: Avoiding Excess Taxation

Trent Hamans
BMO Harris Private Banking

Buy-Sell Agreements & Life Insurance

J. David Thomas
The Empire Life Insurance Company

Income Splitting and the Attribution Rules

Samantha Prasad
Minden Gross LLP

Capital Gains Exemption and Family Business Succession

Jay Diament
KPMG LLP

Structuring the Sale of a Family-Owned Business

Brandon D. Wiener
Thorsteinssons LLP

The Uses of Estate Freezes in Succession Planning

Brian Cohen
Dentons Canada LLP

Succession Planning: Trusts & Tax Issues

Ian M. Hull
Hull & Hull LLP

Alternatives to Family Succession

James Wong
BMO Harris Private Banking

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

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 August 28, 2014. No refunds will be issued after this date.

Discounts: Federated Press has special team discounts. Groups of 3 or more from the same organization receive 15%. For larger groups please call.

Payment must be received prior to September 4, 2014

Phone: 1-800-363-0722 Toronto: (416) 665-6868 Fax: (416) 665-7733

TO REGISTER FOR 15TH TAX PLANNING FOR THE WEALTHY FAMILY

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Approving Manager Name _____
Approving Manager Title _____
Organization _____
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Please bill my credit card: AMEX VISA Mastercard
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REGISTRATION COSTS

NUMBER OF PARTICIPANTS:
COURSE: \$1975
WEBCAST: \$1575*
* One user licence
COURSE + PROCEEDINGS:
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WEBCAST + PROCEEDINGS: \$1874
PROCEEDINGS: \$799*
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