

Applicable toward CPD Requirement

17th

Take advantage of tax saving opportunities

Tax Planning for the Wealthy Family

Cover all the bases for estate planning and avoid excess taxation

Workshop Included:

INTERNATIONAL WEALTH AND TAX PLANNING

Participating organizations

- Blumberg Segal LLP
- Davies Ward Phillips & Vineberg LLP
- Glenn M. Davis Insurance and Estate
- Gowling Lafleur Henderson LLP
- Manulife Financial
- Miller Thomson LLP
- MNP LLP
- Simpson Wigle LLP
- TaxChambers LLP

Who should attend

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

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

Two-Day-Event



Course Leader
Michael Morgan,
Simpson Wigle LLP



Course Leader
Martin J. Rochweg,
Miller Thomson LLP



Hemal Balsara,
Manulife Financial



Mark Blumberg,
Blumberg Segal LLP



Ron Choudhury,
Miller Thomson LLP



Elie Roth,
Davies Ward Phillips &
Vineberg LLP



David P. Stevens,
Gowling Lafleur Henderson
LLP



Richard M. Wise,
MNP LLP



Sunita D. Doobay,
TaxChambers LLP



Glenn M. Davis,
Glenn M. Davis Insurance
and Estate Consulting

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.

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 & beneficiaries on estate, trust & charitable administration and dispute resolution, and corporate clients on tax minimization and ownership regimes

HEMAL BALSARA

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

MARK BLUMBERG

Mark Blumberg is a Partner at **Blumberg Segal LLP**. He works almost exclusively in the areas of non-profit and charity law. He provides legal services and advice to Canadian charities and foreign charities operating in Canada.

RON CHOUDHURY

Ron Choudhury is a Partner at **Miller Thomson LLP**. His practice focuses on 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 works primarily to address human capital risk management issues.

SUNITA D. DOOBAY

Sunita Doobay is a lawyer practicing taxation at **TaxChambers LLP**. Her areas of practice include corporate income taxation and succession planning.

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, M&As 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.

CO-LECTURERS

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 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
- 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

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
- 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

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 10 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 the Ordre des avocats de la province de Québec.



- Leveraged gifting arrangements

SUCCESSION PLANNING IN THE FAMILY LAW CONTEXT

Business succession within a family requires a well-organized and communicated plan to effectively deal with tax and legal issues that can arise on 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 existing owners
- Using trusts to permit flexibility
- Family law considerations and use of marriage contracts
- Drafting shareholders agreements that are consistent with 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
- 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

INSURANCE CHOICES AND THEIR TAX IMPLICATIONS

With a confusing array of life insurance products available, it is often difficult to understand what they all mean and how they will affect tax planning. This presentation will look at the pros and cons of contemporary insurance products.

- 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
- Unique opportunities for intergenerational policy ownership transfer

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 significance and will suggest steps that can be taken by the testator and their advisors to protect the family's business and other 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

MINIMIZING EXPOSURE TO U.S. ESTATE TAX

It is not uncommon for a wealthy family to contain at least one U.S. person. This session will explore succession planning for such individuals and discuss the potential minefields and strategies to minimize exposure to US estate tax.

- U.S. wealth planning opportunities and their pitfalls
- U.S. taxation principles and their application
- Treatment of multiple residencies
- U.S. gifts and inheritance tax rules

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 various aspects of international taxation relevant to wealth planning for private individuals and families.

- International wealth planning opportunities and their pitfalls
- International taxation principles and their application
- Taxation of non-resident trusts and offshore investment funds
- Gifts and inheritance across borders



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.

Tax-efficient use of life insurance
Nathan Wright
Nathan Wright Law Professional Corporation

International wealth and tax planning
James Hutchinson
Miller Thomson LLP

Insurance choices and their tax implications
Kevin Wark
CALU

Charitable gift planning
Peter A. Wouters
Empire Financial Group

Estate planning for spouses & couples (and related litigation issues)
Melanie McDonald
Borden Ladner Gervais LLP

Succession and tax planning for owner-managers
Deborah Kraft
University of Waterloo

The U.S.-Canada tax treaty protocol: Impacts and planning opportunities
Todd A. Miller
McMillan LLP

Estate planning litigation
Hugh S. McLellan
McLellan Herbert Barristers & Solicitors

Cross-border estate planning
Will Todd
Davis LLP

Postmortem tax planning strategies
Kay E. Gray
Grant Thornton LLP

The use of trusts in estate planning
Nicolas P. Smith
Legacy Tax + Trust Lawyers

Business succession planning
Alison Oxtoby
BMO Harris Private Banking

Wills: Litigation
Brian E. Cohen
Fraser Milner Casgrain LLP

Taxation of investment & retirement income
Fred Purkey
Davies Ward Phillips & Vineberg LLP

Succession planning in the family law context
Clare A. Sullivan
Aird & Berlis LLP

Owner manager tax planning
Gord Squire
Squire Law Firm

The use of estate freezes in succession planning
Brian Cohen
Dentons Canada LLP

Capital gains exemption and family business succession planning
Lorne Zeiler
TriDelta Financial

Alternatives to family succession: Arm's length succession plans
Hemal Balsara
Manulife Financial

Income splitting and the attribution rules for a family business
Samantha Prasad
Minden Gross LLP

Structuring the sale of a family business
Brandon D. Wiener
Thorsteinssons LLP

Buy/Sell agreements and life insurance for business owners
Peter Wouters
The Empire Life Insurance Company

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
Brian Dunkel
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 September 4, 2015. 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 10, 2015

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TO REGISTER FOR 17TH TAX PLANNING FOR THE WEALTHY FAMILY

REGISTRATION COSTS

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