

September 9 & 10, 2009, Toronto

This program has been accredited by the Law Society of Upper Canada towards the professional development requirement for certification. Estates & Trusts Law: 7 hours



5th

TAX PLANNING for the WEALTHY FAMILY

Cover all the bases for estate planning and avoid excess taxation

"Overall, presentations well done. A good selection of topics provided a good overview."

"Absolutely awesome! Learned a lot of very valuable info."

- Kyle Oberndorf,
Business Coach,
Action West Business
Solutions

"Great to hear some real solution ideas for my clients' problems."

who should attend

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

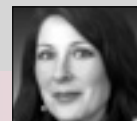
participating organizations

Aird & Berlis LLP	Miller Thomson LLP
Borden Ladner Gervais LLP	Osler Hoskin & Harcourt LLP
Davies Ward Phillips & Vineberg LLP	Scotia Private Client Group, Scotiabank
Fasken Martineau DuMoulin LLP	UBS Bank (Canada)
Gowling Lafleur Henderson LLP	WeirFoulds LLP

course highlights

- Hear the latest tax-savings techniques from leading estate planning and personal tax planning experts
- Explore strategies for using trusts to protect accumulated wealth in a tax efficient basis, looking at the latest judicial decisions, CRA rulings and other pronouncements
- Review the latest developments in tax law pertaining to owner-managers and examine tax planning strategies in light of these tax changes
- Hear how the interplay between family and estate law impacts estate planning for couples
- Get the latest insight on the tax and financial considerations of creative charitable techniques
- Hear a review of issues involved in cross-border estate, wealth and tax planning
- Examine efficient financial, legal and taxation issues regarding wills and how to make sure you cover all your bases and avoid excess taxation
- Look at the tax treatment of the various forms of investment income, including interest, dividends, capital gains and foreign-source income

Course Leader
Corina Weigl,
Fasken
Martineau
DuMoulin LLP



Malcolm
Burrows,
Scotia Private
Client Group,
Scotiabank



Mark Brender,
Osler Hoskin
& Harcourt
LLP



Brian E. Cohen,
Borden Ladner
Gervais LLP



Lori M. Duffy,
WeirFoulds LLP



Fred Purkey,
Davies Ward
Phillips &
Vineberg LLP



Martin
Rochweg,
Miller Thomson
LLP



David P.
Stevens,
Gowling Lafleur
Henderson LLP



Shona N.
Stone,
UBS Bank
(Canada)



Ron
Choudhury,
Aird & Berlis
LLP



FACULTY

COURSE LEADER

CORINA WEIGL

Corina Weigl is a partner with Fasken Martineau. She focuses her practice on estate and family business succession planning, including wills and trusts, corporate reorganizations, marriage contracts, estate administration, charities and not-for-profit law. Since 2002, Corina has received a Lexpert ranking of “Up and Coming” in her practice area.

RON CHOUDHURY

Ron Choudhury is a member of the Aird & Berlis Tax Group and Estates and Trusts Litigation Team. Prior to joining A&B, Ron was an associate in the tax group of another large Toronto law firm.

MARTIN ROCHWERG

Martin Rochweg is a Senior Partner, Tax & Personal Planning, for Miller Thomson. His practice focuses on Canadian & International estate planning involving businesses and families. He is an adjunct professor on estate planning at Osgoode Hall Law School.

CO-LECTURERS

MALCOLM BURROWS

Malcolm Burrows leads philanthropic advisory services at the Scotia Private Client Group, where he advises private clients on charitable giving. Scotia Private Client Group is Canada's largest national service provider to private foundations.

MARK BRENDER

Mark Brender is a partner practising in the Osler's Montréal office in the Tax Department. His practice focuses on domestic and international income tax issues, including cross-border and domestic M&As, corporate reorganizations, spin-offs, financings, trusts and tax dispute resolution. He also advises individuals and private family enterprises on domestic and international trust planning and estate planning.

BRIAN E. COHEN

Brian E. Cohen is a partner in the Toronto office of Borden Ladner Gervais LLP. His areas of practices include wealth management, personal taxation, succession and planning trusts.

DAVID STEVENS

David Stevens is partner in the Business Law department in Gowlings' Toronto office. His practice focuses exclusively on taxation concentrating on corporate tax, personal tax planning and charities. His personal tax and charities practice focuses on succession planning, family trusts, offshore planning, private foundations and charities compliance

LORI M. DUFFY

Lori M. Duffy heads the WeirFoulds LLP's private wealth and estate planning practice. In 1995, she expanded her successful commercial real estate practice to include assisting the firm's clients in managing and transferring their assets through the use of business succession plans, trusts and wills. Her practice includes all areas of trusts, wills and estate administration.

SHONA N. STONE

Shona N. Stone is Director and Co Head, Products & Marketing, and Head of Wealth Planning for the UBS Bank (Canada). She has written articles for various publications including the Ontario Bar Association's Taxation Law Newsletter and Tax Notes International and gives seminars both internally and externally on the taxation of domestic and offshore investments.

FRED PURKEY

Fred Purkey is a partner in the Montreal office of Davies Ward Phillips & Vineberg LLP practising in the area of taxation. He advises clients, both individual and corporate, on the income tax aspects of corporate reorganizations, personal and business trusts, owner-managed businesses and cross-border and international transactions.

COURSE PROGRAM

INTERNATIONAL WEALTH AND TAX PLANNING

The increased interconnectivity 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, concentrating on the theoretical and practical aspects of international taxation with regards to the wealth of private individuals and families. International Investments and Taxation in Canada

- Money Market Funds as Co-ownership vs. FIE
- Principal Protected notes and other structured products issued by Foreign Entity
- Private Equity
- International Trust issues-US, UK and interplay with CAD tax issues

OWNER-MANAGER TAX PLANNING

In order to minimize their overall tax bill, owner-managers must plan their business taxes and personal taxes together to take advantage of all tax saving opportunities. This session will review the latest developments in tax law pertaining to owner-managers and examine tax-planning strategies in light of these tax changes.

- Developments in personal and corporate tax rates: small business rate, capital tax rates and personal tax rates
- Developing integrated tax strategies: you, your business and your family
- Owner-manager remuneration: designing remuneration for greatest tax effectiveness
- Designing shareholder agreements and exit strategies that will minimize taxes
- Postmortem tax planning for private company shares
- Life insurance stop-loss rules

ESTATE PLANNING FOR SPOUSES/COUPLES

When considering wealth management tax planning, one cannot forego considering potential family disputes that can disrupt the process – disputes that will seemingly arise at the most inconvenient time. Many agreements are made years, oftentimes decades, before their conditions come into play, thus adequate preparation for all scenarios must be taken into consideration not only to avoid undesirable outcomes, but to also make sure agreements stick. Making the wrong agreement can lead to disastrous tax repercussions. This session will focus on the interplay between family and estate law.

- Making sure agreements remain valid upon the death of a member
- Spousal trusts and trusts for children
- Grandchildren trusts
- Draft agreements

THE USE OF TRUSTS IN ESTATE PLANNING

High net worth individuals need to have a comprehensive estate plan to reduce the risk of a significant reduction of estate assets by unnecessary litigation. Uncertainty regarding which specific type of trust to establish, improperly structuring the trust vehicle, or not anticipating the impact of recent and upcoming litigation and legislation could expose an estate to legal and tax liabilities. This session will explore strategies for using trusts to protect accumulated wealth in a tax efficient basis, looking at the latest judicial decisions, CRA rulings and other pronouncements.

- Income-splitting arrangements
- Rowe vs. Rowe case study
- Use of trusts for probate tax planning
- Planning for estate liquidity and problems inherent in winding down a family entity
- Structuring trusts in the context of an estate freeze
- Intra-family gifting and generation skipping: techniques to make sure it actually happens

TAXATION OF INVESTMENT & RETIREMENT INCOME AND TSFAS

Investment options open to high net worth individuals have become more sophisticated and diverse, all the more so with the recent addition of tax-free savings accounts (TFSA's). Adding to the complexity is that each potential investment product has different income tax implications. However, the constant is that what really matters to investors is the after-tax rate of return. This session will look at the tax treatment of the various forms of investment income, including interest, dividends, capital gains and foreign-source income.

- Tax treatment of various forms of investment income
- The deductibility of investment expenses and the restrictions that apply
- Pros and cons of TFSA's
- Investment income-splitting
- Tax treatment of various types of investments
- Effective tax rates applicable to capital gains and dividends

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
- Making gifts through wills and trusts
- Charitable remainder trusts
- Private foundations & donor advised funds
- Charitable tax shelters and anti-avoidance issues

CROSS-BORDER ESTATE PLANNING

Canadian tax as it applies to U.S. citizen residing in Canada or whose children are U.S. citizens has undergone considerable changes in recent years. Similarly, U.S. tax law applying to foreign investors has undergone recent change, with more planned on the horizon (legislative proposals to change the U.S. transfer taxes). This session provides a review of issues involved in cross-border estate, wealth and tax planning.

- Cross-border estate planning for U.S. citizens in Canada or whose children are U.S. citizens
- U.S. and Canadian residency issues
- U.S. foreign trust, estate and gift tax rules
- Ownership of U.S. company/partnership
- Minimizing U.S. estate tax owing on U.S. securities and real estate assets

WILLS: AVOIDING EXCESS TAXATION

A crucial but often overlooked part of an estate plan is having an up-to-date will. While many wills are straightforward, there are intricate tax strategies that come into play for high net worth individuals. This session covers efficient financial, legal and taxation issues and how to make sure you cover all your bases and avoid excess taxation.

- Professional assistance: working with your lawyer, accountant and financial planner
- Objectives to be covered: reducing final taxes, leaving money to heirs and charities, business succession planning
- Tax-saving opportunities
- Executor obligations in filing final tax returns
- Changes to the law affecting will planning

BUSINESS SUCCESSION PLANNING

The increases in the fair market values of private corporations whose values are attributable to an operating business have created a number of problems relating to succession. These problems are very different than situations where the values are attributable to investments. This session will first identify some of the problems relevant to family businesses and then deal with some solutions to the problems.

- Reorganizing the corporation to separate the business assets from the investment assets
- Freezing the value of the interests of the existing owners
- Use of trusts to permit flexibility
- Shareholders' agreements that are consistent with the plan
- Exit strategy for non-active family members
- Use of capital gains

IMMIGRATION AND 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, including Residency basics and termination issues, Treaty tie-breaker clauses, Deemed Disposition, Principal Residence, Stop-Loss Rule, Posting Security, and Pre-Departure Planning
- Immigration issues, including Immigration Trusts, Reporting Requirements for New Immigrants, Pensions/Retirement Plans for Immigrants from the US, US Gift Tax Issues in Canada, Planning for LLC Shareholdings

MULTIMEDIA PRESENTATIONS

Register for Tax Planning for the Wealthy Family and we will give you free of charge a CD-ROM comprising the following virtual presentations from recent Federated Press courses and conferences. Presented in their entirety with complete audio and accompanying PowerPoint slides totaling 781 minutes of expert learning, these presentations are an added bonus to this year's course. Bear in mind that these presenters are not necessarily those that you will see and hear at this year's course.

Use of Life Insurance in Tax Planning

Doug Carroll,
Empire Financial Group
Time: 58 Slides: 152

Advanced income tax planning for maximizing asset protection / Owner-manager tax planning

William J. Fowles,
Miller Thomson LLP
Time: 62 Slides: 92

Wills - Avoiding Excess Taxation

Lindsay Histrop,
Cassels, Brock & Blackwell LLP
Time: 75 Slides: 81

Tax Effective Executive Compensation

J. Milan Legris,
AIC Limited
Time: 50 Slides: 56

Charitable Gift Planning

Malcolm Burrows,
Scotia Private Client Group
Time: 57 Slides: 43

Succession Planning

Earl Miller,
Fraser Milner Casgrain LLP
Time: 53 Slides: 23

Estate Planning for Spouses/Couples

Barbara A. Krahn,
Fraser Milner Casgrain LLP
Time: 38 Slides: 42

Panel Discussion: International Wealth Tax Planning

Matt Clark,
Shea Nerland Calnan LLP;
Nadja Ibrahim,
PricewaterhouseCoopers LLP
Time: 48

Use of Life Insurance in Tax Planning

Ralph Burgess,
Peer Financial Ltd.
Time: 58

Estate Planning to Reduce or Resolve Friction

Ian M. Hull,
Hull & Hull LLP
Time: 42

Insurance Strategies for HNW and business owners

J. David Thomas,
Empire Financial Group
Time: 42 Slides: 48

International Wealth, Tax Planning & Asset Protection

Martin Rochweg,
Miller Thomson LLP;
Leela Hemmings,
Miller Thomson LLP
Time: 49 Slides: 26

Taxation of Investment Income

Adam Salahudeen,
Scotia Capital
Time: 40 Slides: 19

Effective Will Planning: Avoiding Excess Taxation

Rachel Blumenfeld,
Miller Thomson LLP
Time: 48 Slides: 21

The use of trusts in estate planning: Planning vs. litigation

Sandra L. Enticknap,
Miller Thomson LLP
Time: 61

Audio/Video segments clickable slide by slide
Papers and overheads also included
Print any of the material for your own use



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: Metropolitan Hotel, 108 Chestnut Street, Toronto, Ontario, M5G 1R3

Cost: The attendance fee for the course is \$1825 per person and covers attendance for one person and the lecturers' presentation material. The fee further includes lunch on the first day, morning coffee on both days and refreshments during all breaks. You may purchase a Proceedings CD-ROM containing edited actual proceedings and materials from the course.

Time: Course registration begins at 8:00 a.m. The morning sessions start promptly at 9:00. The second day ends at noon.

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 will be provided upon cancellation in writing received prior to August 27, 2009. No refunds will be issued after this date. Please note that a 15% service charge will be held in case of a cancellation.

Discounts: Federated Press has **special team discounts**. Groups of 3 or more from the same organization receive a **10%** discount. Groups of 7 or more from the same organization receive a **15%** discount.

Payment must be received prior to September 2, 2009

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TO REGISTER FOR TAX PLANNING FOR THE WEALTHY FAMILY

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 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: _____

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REGISTRATION COSTS

NUMBER OF PARTICIPANTS:
 COURSE: \$1825
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 \$1825 + \$125 = \$1950
 PROCEEDINGS CD-ROM: \$499
 NOTE: Please add 5% GST to all prices.
 Proceedings CD-ROM 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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