Pacific
Business
& Law
Institute

Approved by
the Law Society of BC
for **6 hours** of
professional development credits

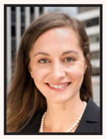
INTERNATIONAL ISSUES IN TAX AND ESTATE PLANNING

Chaired by

Cheyenne Reese
Legacy Tax + Trust Lawyers

May 10, 2023 • Attend via Live Webinar

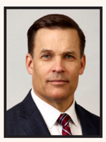
CHAIR



Cheyenne Reese, Principal, Legacy Tax + Trust Lawyers, Vancouver, BC. Cheyenne assists clients with tax, estate and trust planning. Cheyenne received her J.D. from the University of Victoria in 2005 and her Masters of Law Degree in International Taxation from New York University in 2006. As a result, a major part of her practice is related to cross border U.S. – Canada transactions and estate planning, including estate, gift, and generation skipping tax issues. In addition, Cheyenne advises U.S. citizens and green card holders regarding U.S. tax compliance and the U.S. expatriation tax rules. Cheyenne was called to the British Columbia Bar in 2007 and has been at Legacy Tax + Trust Lawyers since that time, becoming a Principal in 2013. Cheyenne has completed Parts I and II of the Canadian Institute of Chartered Accountants' In-Depth Tax Course. She presents often on cross-border tax and estate planning issues.

FACULTY

Cara Chu, Associate, Fasken Martineau DuMoulin LLP, Vancouver, BC. Cara Chu is an associate in Fasken's Real Estate Law practice group. Cara assists clients on a variety of legal matters, including acquisitions and dispositions, financings, and leasing.



Peter J. Glowacki, Partner, Borden Ladner Gervais LLP, Vancouver, BC. Peter is Regional Leader (Planning and Administration) of BLG's Vancouver Private Client Group and practises primarily in the areas of wills, trusts and estates law, including 30 years of experience in all aspects of trust and estate planning, administration and litigation. This includes the planning, preparation and ongoing advice to settlors, will-makers, executors, trustees and beneficiaries pertaining to all aspects of inter-vivos, Indigenous, off-shore and testamentary trusts, as well as advice to financial institutions relating to risk management and compliance in these matters. Peter has a TEP designation from the Society of Trust and Estate Practitioners (STEP). He is a member of the CBABC Wills and Trusts Section, the CBA Charity and Not-for-Profit Law Section executive and a Member of Estate Planning Council of Vancouver. Peter has participated in the planning and presentation of numerous educational sessions to various professional and public groups relative to wills, trusts and estates. He has been selected by peers for inclusion in the 2023 (and since 2014) editions of The Best Lawyers in Canada (Trusts and Estates), was recognized in the 2023 edition of *Canadian Legal Lexpert Directory* (Estates and Personal Tax Planning, Indigenous Law, and Charities/Not-For-Profit Law) and since 2019 (Estates and Personal Tax Planning and Charities/Not-For-Profit Law) and has a Martindale-Hubbell BV Distinguished Peer Review Rating. Peter is the past Chair of Canuck Place Children's Hospice.

Catherine Kim, Counsel, Boughton Law, Vancouver, BC. Catherine practises in estate and trust planning, as well as estate administration. She focuses on personal estate and business succession planning and advises on matters such as: wealth preservation, probate minimization and incapacity planning. Catherine's background in tax also equips her to navigate various income tax and regional real estate tax issues and to provide comprehensive solutions that complement her extensive background in estates and corporate law. She works with accountants, investment professionals and other advisors to implement proactive and practical solutions for individuals, owner-managers of small and medium-sized businesses and professionals of various disciplines.

Hiva Parandian, Associate, Fasken Martineau DuMoulin LLP, Vancouver, BC. Hiva is an associate lawyer in Fasken's Vancouver office, practicing in the Wills and Estate Group. Hiva's experience includes preparation of wills, testamentary trust agreements, powers of attorney, representation agreements, alter ego, joint partner, and disability trusts, as well as family agreements. She also provides estate administration services, including application to obtain grant of probate or administration and provides legal advice with respect to trusts, tax, and preserving and maximizing government disability assistance in the context of estate planning. Hiva also has estate litigation experience. She has appeared as counsel in BC Supreme Court on committeeship applications, wills variation claims, obtaining a death declaration for a missing person, and resolving disputes between beneficiaries and trustees.

Peter A. Wong, Partner, Borden Ladner Gervais LLP, Vancouver, BC. Peter's practice is focused predominantly on the Canadian income tax aspects of estate planning and wealth management, migration and preserving wealth, corporate reorganizations, and investments in Canadian real estate or businesses. As part of his practice, Peter offers his clients tax-efficient solutions for Canadians leaving Canada as well as for Canadians investing abroad. He also assists clients in resolving disputes with the Canada Revenue Agency and works with taxpayers wishing to make a voluntary disclosure.

INTERNATIONAL ISSUES IN TAX AND ESTATE PLANNING

The structure of Canadian families and businesses is becoming more complex and diverse than ever before, and increasingly clients present with assets and beneficiaries located worldwide. Inefficient planning can be disastrous for clients, and practitioners must ensure they stay on top of the best practices and changes in this field. Give your clients peace of mind and security by learning to navigate planning methods and issues that arise when dealing with multiple jurisdictions.

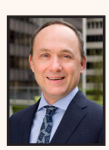
This conference will keep you current on some of the most pressing developments and challenges faced by planners today, bringing together leading experts on estate planning, wealth management and taxation issues to provide you with practical, current advice for addressing the many challenges that arise when clients' assets and beneficiaries are dispersed across multiple jurisdictions. Our expert faculty will provide you with practical planning tools and strategies that you can immediately apply to your practice. You will gain a solid understanding of essential issues and discuss the potential concerns that may arise from time-to-time.

YOU WILL LEAR ABOUT:

- Choice of law considerations and the use of multiple wills
- Real estate issues, including inbound investment and taxable Canadian property
- Tips and traps when dealing with certain US tax and estate issues
- Considerations when choosing your decision-makers
- Select Canadian and international tax considerations

WHO SHOULD ATTEND:

- Wills, trusts, and estate lawyers
- Tax lawyers and professionals
- Accountants
- Insurance professionals
- Trust officers
- Financial planners and wealth management professionals
- Notaries



Ian Worland, Legacy Tax + Trust Lawyers, Vancouver, BC. Ian advises clients in personal and corporate tax planning, corporate reorganizations, estate planning, charitable gift planning and international tax and trust planning. This work also includes advising clients on tax issues arising in connection with the acquisition or sale of a business, divorce, separation, variations of trusts and wills, and flow-through share financings. Ian also represents clients in disputes with the Canada Revenue Agency and the Ministry of Provincial Revenue (BC) and has appeared on behalf of clients in courts of all levels. Ian has been a member of the Society of Trust and Estate Practitioners (STEP) since 2002 and was a member of the board of directors of STEP Canada from 2007 to 2017, serving as Chair of STEP Canada from 2013 to 2015.

International Issues in Tax and Estate Planning

May 10, 2023

9:00 Welcome and Introduction by PBLI

9:05 Chair's Welcome and Introduction

Cheyenne Reese
Legacy Tax + Trust Lawyers

9:10 Choice of Law and Multiple Wills

Peter J. Glowacki
Borden Ladner Gervais LLP

- Remote/virtual execution
- Choice of law considerations
- Determining location of different types of assets
- Using separate wills for assets in different jurisdictions
- Practice points when administering multiple wills
- Drafting multiple wills: traps to avoid, sample language

9:55 Questions and Discussion

10:05 Morning Break

10:20 Real Estate Holdings

Cara Chu & **Hiva Parandian**
Fasken Martineau DuMoulin LLP

- Speculation Tax and Vancouver Vacancy Tax
- Foreign Buyers Property Transfer Tax
- *Land Owner Transparency Act*
- Principal Residence Exemption
- Underused Housing Tax
- Inbound investment planning
- Ban on foreign buyers

11:05 Questions and Discussion

11:15 US Tax and Estate Issues

Cheyenne Reese
Legacy Tax + Trust Lawyers

- US estate and gift tax issues
- Select tax considerations of dual citizenship, expatriation
- Considerations when choosing US decision-makers or beneficiaries
- Moving trusts to the US: sample language

12:15 Questions and Discussion

12:25 Lunch Break

1:20 Considerations When Choosing Your Decision-Makers

Catherine Kim
Boughton Law

- Looking at the various estate planning roles:
  - Right person for the role
  - Co-appointments vs. sole appointments
  - Impact of naming non-residents
  - When to consider a professional
- Sample language for acting decision-makers to appoint co-decision-makers when appropriate

2:05 Questions and Discussion

2:15 Afternoon Break

2:30 Tips and Traps - Canadian Tax Considerations

Ian Worland
Legacy Tax + Trust Lawyers

- Residency and deeming provisions
- Intro to Canadian taxation of non-resident trusts
- Domestic trusts with non-resident beneficiaries
- When and when not to use a trust

3:20 Questions and Discussion

3:30 Select International Tax Considerations

Peter A. Wong
Borden Ladner Gervais LLP

- Offshore trust and current planning trends: immigrant trusts; granny trusts; departure trusts, asset protection trusts; real estate trusts; reporting issues
- Other foreign entities

4:20 Questions and Discussion

4:30 Chair's Closing Remarks

4:35 Program Concludes

PBLI Pacific Business & Law Institute

Information

Two Ways to Register:

1. Telephone us: 604-730-2500

2. Register at **www.pbli.com/crossborder23**

Registration: The registration fee is $845.00 plus GST of $42.25 totalling **$887.25**. Registration fee covers your access to the live webinar and electronic materials.

Early Bird Discount: Register by April 11, 2023 and receive a $100 discount on the registration fee ($745.00 plus GST). Discounts cannot be combined.

Group Discounts: Register four persons from the same organization at the same time and you are entitled to a complimentary fifth registration. Discounts cannot be combined.

Payment: You may pay by VISA, MasterCard or cheque. Cheques should be made payable to the Pacific Business & Law Institute. Registration fees must be paid prior to the program.

When and Where: The program starts at **9:00 a.m. (PDT)**. Attend via Live Webinar: All you need is a computer with a good internet connection and external plug-in speakers or good headphones for optimal audio and volume.

Materials: The faculty will prepare papers and/or other materials explaining many of the points raised during this program. Please contact us at **registrations@pbli.com** if you are unable to attend the program and wish to purchase a set of electronic materials.

Your Privacy: We will keep all information that you provide to us in strict confidence, other than to prepare a delegate list containing your name, title, firm and city for our faculty and the program delegates. We do not share our mailing lists with any non-affiliated organization.

Cancellations/Transfers: Refunds will be given for cancellations (less a $60.00 administration fee) if notice is received in writing five full business days prior to the program (**May 3, 2023**). After that time we are unable to refund registration fees. Substitutions will be permitted. We reserve the right to cancel, change or revise the date, faculty, content, availability of webinar or venue and transfer in-person registration to webinar registration for this event.

Course Accreditation: Attendance at this course can be listed for up to **6 hours** of continuing professional development credits with the Law Society of BC. For practitioners in other jurisdictions, please check your governing body's CPD requirements.

Registration Form

Pacific Business & Law Institute

Unit 2 - 2246 Spruce Street
Vancouver, BC Canada V6H 2P3
Telephone: 604-730-2500; Fax: 604-730-5085
E-mail: **registrations@pbli.com**

International Issues in Tax and Estate Planning

May 10, 2023

Attend via Live Webinar

❑ **Live webinar** ($845+GST)

❑ **Live webinar** (Early Bird, $745+GST)

Salute | First Name | Last Name | Position/Title

Firm/Company

Address

City | Province/Territory | Postal Code

Telephone | Fax | Email

Paid by: ❑ VISA ❑ MasterCard ❑ Cheque payable to Pacific Business & Law Institute

/ / / /

Card Number | Expiry Date

Please indicate your areas of interest for future notifications (select all that apply):

❑ Estate planning ❑ Personal tax ❑ Taxation of real estate ❑ Taxation of small business ❑ Trusts ❑ Other ____________

How did you hear about this program?

❑ Brochure ❑ Email ❑ Colleague ❑ PBLI Website ❑ Social Media ❑ Other ____________

Please recycle

Register today at www.pbli.com/crossborder23