

TAX AND ESTATE PLANNING ADVICE TO TRUSTEES AND ADVISORS OF FOREIGN-BASED FAMILY TRUSTS

Hodgson Russ provides U.S. tax and estate planning advice to numerous trust companies that act as trustees or advisors of foreign-based family trusts, applicable to when the trust acquires U.S.-situs assets or has a beneficiary who becomes a U.S. resident. Our services to these clients include U.S. tax advice to avoid the U.S. accumulation distribution rules applicable to distributions from foreign trusts to U.S. beneficiaries and to avoid potential application of the U.S. passive foreign investment company (PFIC) rules for shares of foreign companies held by the trust, U.S. reporting obligations on IRS Form 3520, and recommendations for appropriate language in the trust agreement to provide U.S. estate tax protection for trustees or beneficiaries who are U.S. residents.

Attorneys

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Practices & Industries

Canada-U.S. Cross-Border

International Tax

International Trusts & Estates

International-U.S. Cross-Border