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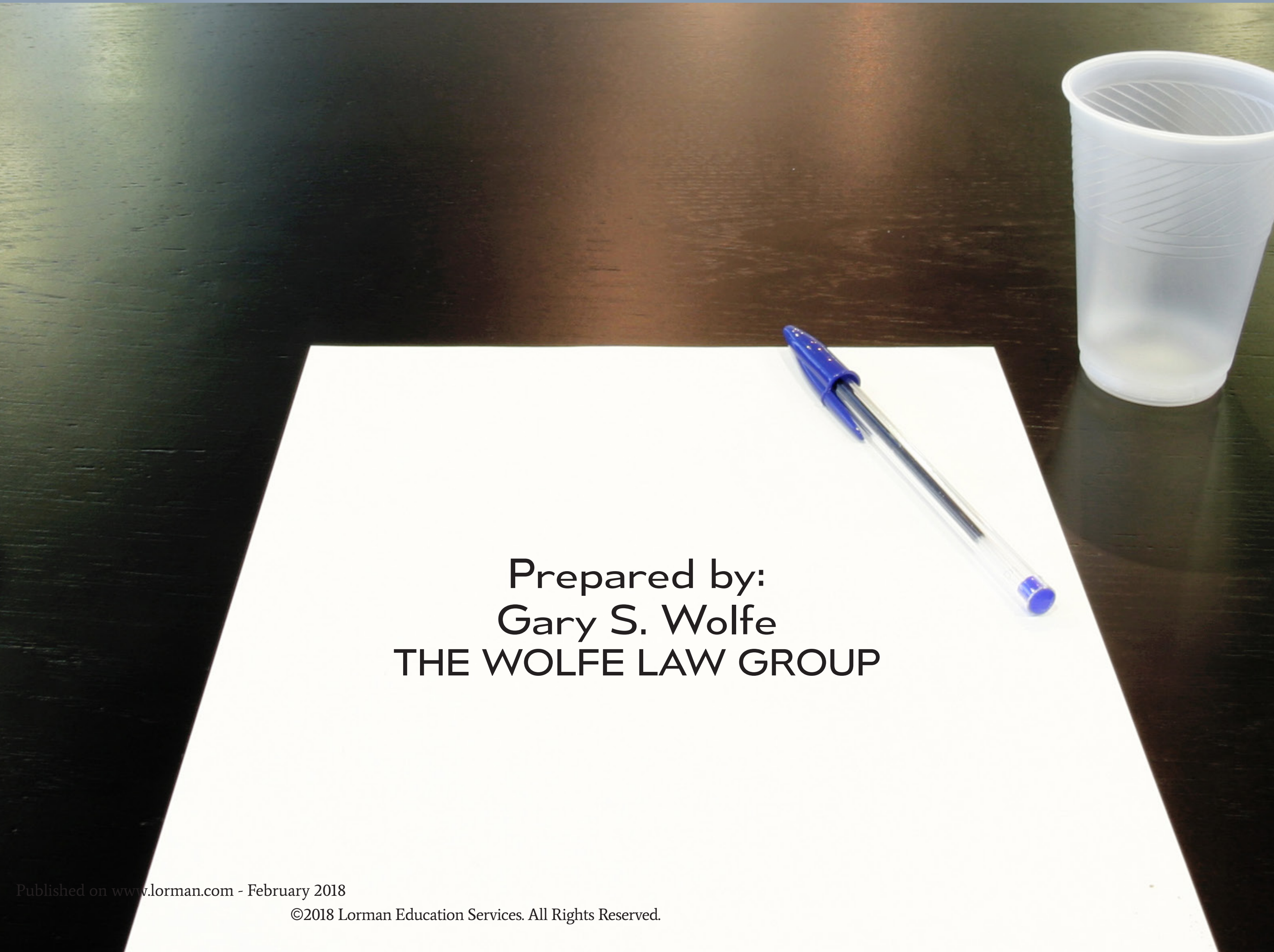
GLOBAL HIGH NET WORTH INVESTORS: *INCOME, ESTATE AND GIFT TAX PLANNING - PART 3*



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THE WOLFE LAW GROUP

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THE WOLFE LAW GROUP

The Wolfe Law Group is an international array of legal and tax experts providing collaborative services for Global High Net Worth Investors on a per client basis.

Gary S. Wolfe, A Professional Law Corporation has over 35 years of experience providing clients with expertise for IRS Civil and Criminal Tax Audits, International Tax Planning, and International Asset Protection.

Awards
Since 2015 Gary have been the recipient of 29 separate international tax awards from 10 different global expert societies in London/UK including:

International Tax Planning Law Firm of the Year Award (2017) – International Advisory Experts.

International Tax Advisor of the Year (2017) - Global Business Magazine/Prof. Sector Network.

Click here for complete list.

Books
To date Gary has written 18 e-books (available on Amazon) regarding the IRS, International Tax Planning and Asset Protection. Click here for complete list.

Articles
To date Gary has published or been interviewed in 100+ separate articles published by 15 different US and International magazines. Click here for complete list.

Video
In December 2016 Gary was interviewed by California CEO Magazine and RCBNNews.org on the subject of Criminal Tax Evasion and IRS Tax Audits: Civil and Criminal Issues. This 4 part series, which has been published by Lorman Education, can be viewed below:

Criminal Tax Evasion - Part 1
Criminal Tax Evasion – Part 2
Criminal Tax Evasion – Part 3
Criminal Tax Evasion – Part 4

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Global High Net Worth Investors:
Income, Estate & Gift Tax Planning - Part 3

Global high net worth investors with worldwide investment portfolios (held in multiple jurisdictions via a variety of entities) may pre-U.S. immigration exempt these assets from U.S. estate and gift tax by the pre-immigration transfer of the assets to an irrevocable offshore trust.

U.S. global high net worth investors may benefit by gift tax planning to accomplish the tax objective of excluding post-gift appreciation from further U.S. gift tax or future U.S. estate tax.

All global high net worth investors may use investment tax planning strategies to legally not report worldwide portfolio income, either defer tax or exempt tax on the portfolio earnings, and not file tax returns declaring the income annually.

Third party creditors may be completely pre-empted from attaching any of these assets absent a fraudulent conveyance.

Once the trust receives maximum $22.4m, assets above that amount may be “sold via installment sale to the trust” (no capital gain tax is due since it is sale between taxpayer and their grantor trust); “interest” received by the U.S. taxpayer from any note (if note is involved) is not taxable (no tax on “interest paid from trust to US grantor”); if the note is self-cancelling then it is not included in U.S. taxpayer estate, not reported under Form 706, not subject to 40% estate/gift tax.

Under the 2017 Tax Act, pass-thru distributions from partnerships, limited liability companies, and S-Corporations are given a 20% tax deduction for certain businesses (architects, engineers and real estate developers who own income producing commercial property). If shares in the company are gifted to the trust when the shares are minority interests they may get a minority interest discount (up to 50% discount subject to independent written appraisal).

So you may have taxpayers who may transfer up to $40m+ of ownership interests in real estate (held by pass-thru entities), exclude the appreciation from future 40% U.S. estate & gift tax, pre-empt third party creditor attachment absent a fraudulent conveyance.