FRANK HIRTH'S TRUST & ESTATE TEAM

WE PROVIDE COMPLIANCE AND ADVISORY SERVICES ACROSS THE US & UK.

We have a dedicated team of more than 20 professionals providing advisory and compliance services to private clients and trustees who must consider US and/or UK tax as part of their current situation or future planning.

We consider ourselves to be unique with extensive experience in UK and US tax matters. We will listen, taking the time to understand objectives and aspirations, and help clients and their families implement effective estate planning strategies.

Many of our clients will have an international outlook when considering their tax connection to the US and/or UK. The interaction between the two countries is a strength of ours but we are equally well placed to deal with clients who only need to consider one of these jurisdictions. Where another country is relevant, our international focus enables us to work with other advisors to ensure that the client is able to understand their complete situation.

Given the recent focus on the "offshore" world from both the US and UK tax authorities, it has been invaluable to have our concentration of talented tax professionals which has enabled us to create dedicated technical teams, to analyse the "once in a generation" US tax reform as well as the hugely challenging UK non-domicile rules. This has enabled us to stay at the forefront of technical excellence and provide practical solutions. All our tax technical staff are client-facing which ensures that the understanding of any tax impact or the practical implementation of any planning sits equally alongside technical excellence.

HOW WE CAN HELP

We provide compliance and advisory services across the US & UK. We understand where legal advice is required and regularly work with other advisors to ensure the client receives the most comprehensive analysis and guidance. Our deep understanding of the US and UK tax codes enables us to complement any advice received with strong compliance services.

We recognise that working collaboratively and communicating with the clients' full advisor team is, now more than ever, essential.

Frank Hirth PLC London | **Frank Hirth LLC** New York | **Frank Hirth LTD** Wellington **www.frankhirth.com** | t: +44 (0) 207 7833 3500 | mail@frankhirth.com

AREAS OF EXPERTISE

Advisory and compliance services in respect of the following taxes:

USA
- Federal & State/City level Income Tax
- Federal Gift, Estate and Generation Skipping Transfer Tax

UK
- Income Tax
- Capital Gains Tax
- Inheritance Tax
- Stamp Duty Land Tax

We also provide services in respect of FATCA & CRS.

Detailed below are some practical examples of our services which give an insight into our capabilities:

- Provide all US Federal & State Tax compliance, and required analysis, relating to foreign trusts with a US connection, whether it be through the settlor, beneficiaries or by reference to the assets held.
- Review of the impact of the US tax reform, including IRC s965 "Transition" for specified foreign corporations and planning in respect of the "GILTI" regime for Controlled Foreign Corporations under the newly introduced definitions.
- Lifetime gifting and estate tax strategies, including interaction with any UK Inheritance tax considerations.
- Analysis of US focused succession planning and trust structures intended to benefit UK residents.
- Preparation of UK tax basis income and gains pools for offshore trusts for the purpose of "matching" against benefit received by UK beneficiaries and to support UK compliance.
- Rectifying situations of non-compliance in both the US & UK through the recognised programs provided by HMRC and the IRS.

A DEDICATED TEAM OF MORE THAN 20 PROFESSIONALS

CONTACT

If you would like to discuss any US or UK tax matters, please contact one of the Directors within the Trust & Estate team:

Iain Younger Iain.Younger@frankhirth.com
Michael Lewis Michael.Lewis@frankhirth.com
Sarah Farrow Sarah.Farrow@frankhirth.com