

Ottawa Branch  
Presents:



## Canada / U.S. Tax and Estate Planning Cross-border Issues

Friday, November 21<sup>st</sup>, 2008

**Venue:** Brookstreet Hotel, 525 Legget Drive,  
Kanata

**Speakers:** Ed Northwood, LL.B., TEP  
Hugh Faloon, CA, CFP, TEP

8:30 a.m. – 9.00 a.m.

**REGISTRATION and CONTINENTAL BREAKFAST**

9:00 a.m. - 10:30 a.m.

**REVIEW BASICS  
As US TAXPAYER**

Income tax – Citizen; green card; substantial presence;  
Estate tax – Citizen; domiciliary  
Expatriation – New law

**Tax Laws**

Income tax – Resident; Non-Resident  
Gift + Estate Tax – Worldwide; Non-Resident Alien

10:30 a.m. - 10:45 a.m.

**BREAK**

10:45 a.m. - 12:15 p.m.

**Estate Planning Design and Drafting**

Will Design  
Inheritance Trusts [for US children of Canadian parents]  
Life Insurance Trust

12:15 p.m. - 1:15 p.m.

**LUNCH**

1:15 p.m. – 2.45 p.m.

**US Income Tax Headaches – The Anti-Deferral Rules for  
Corporations – PFIC + CFC  
For Trusts – Foreign Grantor Trust + Foreign Non-Grantor Trust;  
Compliance; ways to avoid/minimize; planning considerations**

2:45 p.m. - 3.00 p.m.

**BREAK**

3:00 p.m. - 4:30 p.m.

**Acquiring and holding US Situs Assets**

- US real estate;
  - residential
  - commercial
- **Other US assets**
- **Terms of Trusts and Wills** that are used in such situations

4.30 p.m.

**ADJOURN**