EXPERTISE

PRIVATE WEALTH

Forsters services for US-connected clients

Individuals with personal and financial connections in both the US and the UK need to navigate two very different and complex tax regimes. It is essential for them to obtain integrated advice in relation to their tax exposure and reporting obligations. It is, therefore, vital for their advisors to have a clear understanding of the interaction between the two regimes in order to plan effectively.

Forsters' Private Client group has a team of specialist UK lawyers who are experienced in advising clients on US/UK cross-border matters, including personal tax, trust and estate planning. The team has a strong understanding of US tax issues and how they interact with UK taxation.

Our deliberately independent model means that we have the flexibility to work either with clients' existing US advisors, or with selected firms with which we have well established relationships, in order to provide clients with integrated US/UK advice. Members of the US/UK team travel to the US regularly to meet clients and intermediaries there.

"THE QUALITY AND TIMELINESS OF THEIR ADVICE IS FIRST CLASS."

Chambers HNW Guide

OUR US/UK AREAS OF EXPERTISE INCLUDE:

- **Estate planning advice** and drafting wills for clients with exposure to both UK inheritance tax and US estate taxes.
- **Pre-residence tax advice** for US persons moving to the UK.
- Advice to US persons on structuring the **acquisition and ownership of UK residential property**.
- Advice on the **characterisation of US revocable trusts** for UK tax purposes.
- Advice on mitigating **double tax risks associated with trusts** that have US and UK tax connections.
- Advice on the creation of "**excluded property trusts**" for US persons to protect their non-UK assets from UK inheritance tax.
- Advice on gift planning for US persons using **family limited partnership structures** (where UK inheritance tax precludes the use of trusts).
- Advice on the creation, use and tax treatment of **life insurance trusts** for UK resident US persons.
- Advice on tax-efficient **charitable giving** for clients with a dual exposure to US and UK taxation.
- Advice to UK resident individuals on mitigating the risk of double taxation on **income from US LLCs**.
- Advice on cross-border **restructuring of private businesses** with entities that are resident in both the UK and US.

OTHER SERVICES FOR INTERNATIONAL PRIVATE CLIENTS

In addition to our specialist US/UK team, our wider Private Wealth practice advises international clients on a broad range of issues that may be relevant to clients with US/UK cross-border connections. This includes:

MENTAL CAPACITY

- Advising on mental capacity issues and lasting powers of attorney.

PROBATE

- Assisting with the administration of a deceased's estate and grant of probate in the UK.

FAMILY

- Divorce and separation and matters affecting children.
- Pre and post nuptial agreements.
- Trustees' duties in the event of a beneficiary divorcing.
- International adoption and surrogacy.

UK REAL ESTATE

- The acquisition and disposal of UK residential and commercial property.
- Forming property holding structures.
- Planning and development applications.
- UK tax advice on real estate transactions.

CONTENTIOUS TRUSTS AND ESTATES

- Conflicts arising out of wills, trusts or succession planning and cross-border estates.
- Litigation and where appropriate alternative dispute resolution.

IMMIGRATION

- Tier 1 (Investor) Visa – existing applicants.
- Family visa: partners.
- British citizenship by naturalisation.

ART

- Import and export of works of art.
- Buying and selling art privately or at auction.
- Liability and insurance issues for trustee owners of heritage property and art.
- Disputes regarding ownership, provenance and authenticity of art.

CORPORATE

- Structuring business assets together with associated regulatory matters.
- M&A and private equity.
- Corporate restructuring and commercial contracts.
- Banking and finance including investment funding.

THE TEAM

With a department of over 60 private client legal experts, including 30 partners, Forsters can assist you by providing partner-led advice supported by a wider team of associates that has the right level of expertise and blend of skills required to ensure clients receive the highest quality legal advice.

18th Annual STEP PRIVATE CLIENT Awards — STEP — WINNER International Legal Team of the Year (large firm)

17th Annual STEP PRIVATE CLIENT Awards — STEP — WINNER Family Business Advisory Practice of the Year

15th Annual STEP PRIVATE CLIENT Awards — STEP — WINNER Private Client Legal Team of the Year (midsize firm)

EXPERTISE

FORSTERS SERVICES FOR US-CONNECTED CLIENTS

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