

U.S. Tax Consequences of Immigrating to the U.S.

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I. Income Tax

- ▶ A. Taxation of Worldwide Income
- ▶ B. Passive Income Earned by Entities Included
- ▶ C. Foreign Tax Credit
- ▶ D. Rates
 - ▶ 1. 39.6% Highest rate
 - ▶ 2. 20.0% Capital gains rate
 - ▶ 3. +3.8% Medicare tax
 - ▶ 4. 2016 Elections



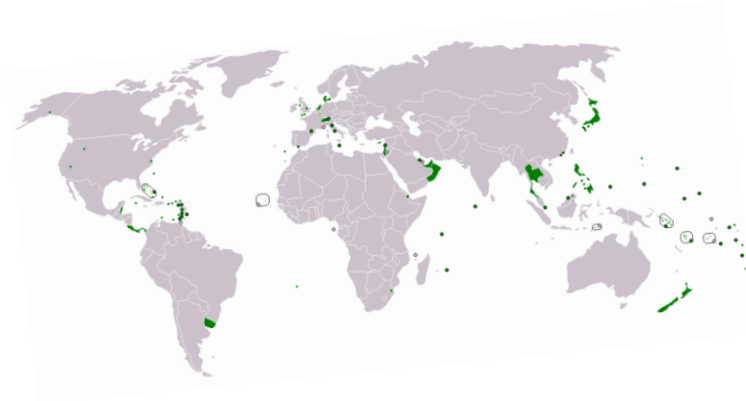
II. Estate/Gift Tax

- ▶ A. Worldwide Assets
- ▶ B. 40%
- ▶ C. Exemption \$5,450,000+



III. Reporting

- ▶ A. All Offshore Entities
- ▶ B. All Offshore Accounts (own/signature authority)
- ▶ C. All Offshore Financial Assets
- ▶ D. Beneficiary Interest in Foreign Trusts



IV. Planning

- ▶ A. Best before you become a U.S. resident
- ▶ B. Trusts
 - ▶ 1. Revocable
 - ▶ 2. Irrevocable
 - ▶ a. Do you maintain an interest?
 - ▶ 3. Estate Tax Trust
- ▶ C. Gifts
- ▶ D. Payments not counted as gifts



VI. Immigration

- ▶ A. EB-5
- ▶ B. L-1

