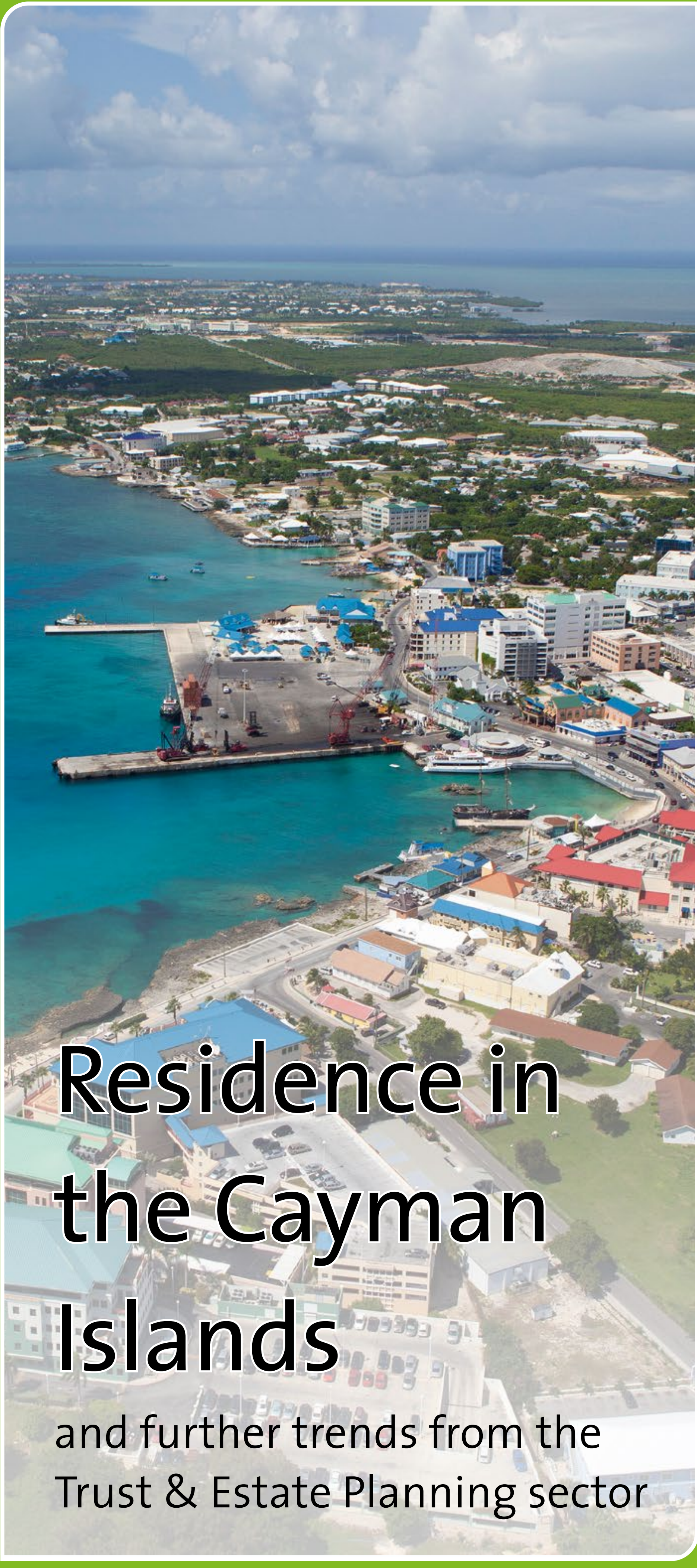
GGi

FYI

Trust & Estate Planning

NEWS



Residence in the Cayman Islands

and further trends from the Trust & Estate Planning sector

Newsletter
No. 07 | Spring 2021

Editorial

Dear Reader

As the Global Chairperson of the GGI Trust & Estate Planning (TEP) Practice Group (PG), I am very honoured to introduce you to the Spring Issue of our FYI Newsletter.

Once again, our newsletter sees the participation of many GGI members and friends from different countries, whom I personally and truly thank for their precious support and hard work.

While reading this publication, you will discover the latest updates, developments, and special topics covering trust and estate planning all around the world.

In fact, the following and valuable articles concern tax, financial and insurance planning, and the latest disputes on trusts and gifting.

Since it is not possible yet to meet each of you and each of the authors in person, I suggest you contact them directly to provide further information on any of the issues proposed and discussed, with the hope of organising the next TEP PG meeting as soon as possible.

Those meetings represent a huge opportunity to exchange ideas, different points of view, and expertise, so I deeply hope that we will be able to meet in person in the coming months.

Also, if you are interested in taking part in any of the upcoming TEP PG meetings or publications, or if you would simply like additional information, please do not hesitate to contact me at stefano.loconte@studioloconte.it.

I do really hope you will enjoy reading this TEP FYI Newsletter and I look forward to meeting you very soon!

Kind regards,

Prof Stefano Loconte
Global Chairperson of the Trust & Estate Planning Practice Group

Residency in the Cayman Islands

By Buck Grizzel

There are several options for residency in the Cayman Islands. These include the following:

1. The Global Citizen Concierge Programme

The Global Citizen Concierge Programme (GCCP) allows persons who are employed outside of the Cayman Islands with the financial independence to work remotely to relocate to the Cayman Islands for up to 24 months. Applicants must provide proof of employment with an entity outside of the Cayman Islands stating position, length of employment and annual salary. A minimum annual income of USD 100,000 if applying as an individual, USD 150,000 if applying with an accompanying spouse/civil partner, or USD 180,000 if applying with an accompanying spouse/civil partner and/or dependent(s) is required. The annual GCCP fee is USD 1,469 for two persons, and each additional dependent cost USD 500 per annum.

2. Residency Certificate for Persons of Independent Means

Wealthy retirees who wish to live but do not need to work in the Cayman Islands, i.e. being persons who have the means to support themselves without working in Cayman, may apply for a Residency Certificate for Persons of Independent Means. The required financial standing needed for this Certificate is as follows:

1. A continuous source of annual income of no less than KYD 120,000, or an account with a Cayman Islands Monetary Authority-regulated institution, with a minimum deposit of KYD 400,000 in assets; and
2. Invest KYD 1,000,000 of which at least KYD 500,000 is in developed real estate.

Applicants must also pay an administrative fee of KYD 500 when they submit their application and a further fee of KYD 20,000.

The requirements for a Residency Certificate for Persons of Independent Means in Little Cayman and Cayman Brac are an annual income of KYD 75,000 or maintenance of a bank account with a deposit of at least KYD 400,000 and investment of KYD 500,000, of which at least KYD 250,000 is in developed real estate.

3. Certificate of Permanent Residence for Persons of Independent Means

A person who invests and maintains KYD 1,600,000 in developed real estate will qualify for a Certificate of Permanent Residence without the right to work. Applicants must

...next page

GGI member firm
Stuarts Walker Hersant Humphries
Law Firm Services, Advisory, Corporate Finance, Fiduciary
Grand Cayman, Cayman Islands
T: +1 345 814 7911
W: stuartslaw.com
Buck Grizzel
E: buck.grizzel@stuartslaw.com

Buck Grizzel

Stuarts Walker Hersant Humphries (Stuarts) is a client-oriented offshore legal practice in the Cayman Islands offering fully integrated corporate and commercial legal advice from our experienced attorneys. We provide timely, exceptional legal advice and representation to our clients in connection with their commercial transactions, structures, liabilities and obligations.

Buck Grizzel has over fifteen years' specialist experience advising on Cayman Islands Law. He advises on Real Estate, Planning, Corporate and Commercial, Immigration, Employment, Business Licensing Act, and other regulatory matters.

have a clean police record, be in good health, have adequate health insurance, and have sufficient financial resources to adequately maintain themselves and their dependents.

4. Certificate of Direct Investment

A person who invests KYD 1,000,000 in a licensed new or existing employment generating business will qualify for a Certificate of Direct Investment. These Certificates are valid for 25 years and are renewable. In order to meet the definition of an "employment generating business", 30% of its employees need to be Caymanian. The applicant should exercise substantial management control of the business and must have a substantial business track record or a background relevant to the businesses. Such businesses remain subject to the provisions of the Local Companies (Control) Act (2021 Revision) which requires that ordinary companies trading in the local economy be sixty percent owned and controlled by Caymanians unless specifically exempted and licensed in that regard.

5. Residency Certificate (Substantial Business Presence)

A person who proposes to be resident in the Islands and will own at least ten percent of the shares and/or will be employed in a senior management capacity in a company with a substantial business presence will qualify for a Residency Certificate (Substantial Business Presence). Residency Certificates (Substantial Business Presence) are valid for twenty-five years and are renewable.

In order to meet the definition of a "substantial business presence", it will need to establish a physical presence through the purchase or lease of commercial real estate and the employment of at least four employees who will reside in the Islands for a minimum of nine months per calendar year. There are approved categories of businesses which qualify for this certificate.

6. Permanent Residency

Persons who have been legally and ordinarily resident in the Islands for a period of at least eight years may apply for the right to reside permanently in the Islands. A point system has been established for the purpose of assessing the suitability of an applicant for permanent residence. A minimum of 110 points is needed for permanent residency to be granted.

Read the full article at stuartslaw.com

Australian State Taxes: Land Tax and Duty Surcharges for Foreign Investors

By Tony Nunes and Jane Harris

Investors from outside Australia with interests in Australian real property should check the state taxes in the state or territory in which the property is located.

Each state and territory has different taxes and different definitions of what constitutes a "foreign person".

For example, Revenue New South Wales (NSW) imposes a surcharge land tax of 2% on the taxable value of residential land in NSW owned by foreign persons and a purchaser duty of 8% for foreign purchasers. There is no tax-free threshold applicable to the surcharge. The terms "foreign person" and "residential land" have specific meanings for the purposes of these rules.

Treatment of Trusts

The treatment of trustee owners of Australian property illustrates the differences between the jurisdictions. In NSW and Victoria, a trustee will be deemed to be a foreign person if that trust can nominate a foreign person as a beneficiary, unless an amendment is made to the deed to irrevocably exclude "foreign persons"

from being beneficiaries. However, in Queensland, a trustee will only be deemed to be a foreign person if the default beneficiary of the trust (i.e., the beneficiary who is entitled to income if the trustee does not make a determination) is a foreign person. South Australia looks at whether any of the named beneficiaries are foreign persons. If an unnamed person who is a foreign person is within a class of family members, this is not considered when determining if the foreign ownership surcharge applies.

Absentee Owners

NSW, Queensland, Victoria, and the Australian Capital Territory have also introduced "absentee owner surcharges" of between 0.75% and 4% for land owned by individuals or by entities controlled by individuals who are not physically present in Australia. Each of these jurisdictions has different rules regarding the types of land subject to the charge and the definition of an "absentee owner".

GGI member firm
Kelly + Partners Chartered Accountants
Advisory, Auditing and Accounting, Corporate Finance, Tax, Fiduciary and Estate Planning
Sydney, Australia
T: +61 2 9933 8866
W: kellypartners.com.au
Tony Nunes
E: tony.nunes@kellypartners.com.au
Jane Harris
E: jane.harris@kellypartners.com.au

Tony Nunes

Jane Harris

Kelly + Partners Chartered Accountants is a specialist chartered-accounting business that assists private businesses, private clients, and families to manage their business and personal financial affairs. The Kelly + Partners Tax Consulting Practice is respected as one of the foremost tax advisory firms in Australia and offers the full range of direct, indirect, and international tax services.

Tony Nunes has over 22 years' experience in providing tax advice to clients, especially on issues affecting cross-border transactions, acquisitions, and restructures, and on all aspects of structuring the ownership and financing of corporations and their operations.

Jane Harris has over 10 years of experience assisting high-net-wealth and SME clients with taxation matters. She provides clients with structuring, negotiation, and tax legal advice, predominantly in income tax. Jane also frequently advises on the opportunities and risks of operating personal and business affairs through a variety of structures, including trusts.

KELLY + PARTNERS
TAX CONSULTING

The Dispute Surrounding the Indirect Taxation of Italian Trusts

By Angela Cordasco

The indirect taxation of trusts, with reference to inheritance and gifts tax, has not been a straightforward matter over the years.

The dispute mainly relates to the tax event when the inheritance or gift tax is due and it is effectively caused by a lack of regulatory clarity: although the legislator has indeed regulated the trust's direct taxation, and therefore the taxation on the income produced by the trust, nothing was established with regards to indirect taxes.

The Italian Revenue Agency faced the matter quite some time ago, with circular no. 48/E, published in 2007, and circular no. 3/E, published in 2008, clarifying that the inheritance or gift tax shall be paid when the asset is transferred to the trust, as the taxable event – for indirect taxation – is when the settlor transfers the ownership of the asset to the trustee.

The above thesis, supported by the Italian Supreme Court in some pronouncements issued around 2015, is convenient for the taxpayer, since by anticipating the tax event it is possible to benefit from the current (low) tax rates, avoiding the risk of a future tax increase. The current tax goes from 4% in the case of spouses and parents/children (with an allowance of EUR 1 million for each beneficiary), to 6% for close relatives (with an allowance of EUR 100,000 for siblings), to 8% in the case of no family members (with no allowance).

GGI member firm
Loconte & Partners,
Studio legale e tributario
Advisory, Auditing & Accounting, Corporate Finance, Fiduciary & Estate Planning, Law Firm Services, Tax
Bari, Italy
T: +39 080 572 2880
W: loconteandpartners.it
Angela Cordasco
E: angela.cordasco@studioloconte.it

Loconte & Partners, Studio legale e tributario is a law firm specialising in tax and legal consultancy that assists Italian and international clients, helping them to preserve and grow their wealth.

Angela Cordasco

Angela Cordasco is an Italian lawyer. After graduating in Law, she completed two postgraduate Masters degrees focused on Tax Law and on Wealth Management and Asset Protection. She has noteworthy experience in tax law matters and cross-border individual taxation. Angela joined Loconte & Partners in 2014, where she deals mainly with private clients for asset protection and wealth management services.

LOCONTE & PARTNERS

Notwithstanding the interpretation made by the Italian Revenue Agency, the most recent pronouncements of the Italian Supreme Court, confirming the theory of many trust law experts, has changed the approach to the matter, stating that inheritance and gift tax shall be paid when the asset is definitively distributed to the beneficiaries and not when it is transferred to the trust. The reason is that when the asset is initially transferred from the settlor to the trustee, there is no actual enrichment of the latter. Such enrichment, being a condition for the application of Italian inheritance and gift tax, occurs only when the ultimate beneficiaries receive the trust's asset.

Planning a Legacy for your Estate

By Nikki Cheong

Estate planning prepares for the transfer of assets to an individual's loved ones in the event of incapacitation or death while the term legacy planning evokes a more holistic approach, including crafting a lasting family narrative. Considering these uncertain times and the imminent "Great Wealth Transfer" from baby boomers, financial planning has become a pressing need for many wealthy individuals.

A smooth transfer of asset seeks to mitigate family strife by protecting beneficiaries, especially minors, and avoiding contest on will and personal representatives. In addition, it facilitates business succession by minimising impact to the company in the event of the owner's critical illness, disability, or death.

Financial planning can also help legally insulate assets from creditors, and/or extensions of the family as well as reduce significant tax liabilities by considering multi-jurisdiction implications.

Some common instruments of estate planning include establishing a lasting power of attorney where the designated person can make decisions on one's behalf in the case of loss of mental capacity, or employing wills to spell out the manner of asset distribution upon demise. Some also purchase insurance policies to allow beneficiaries to receive financial compensation in case of an unfortunate event.

There is a wide range of wealth planning structures available such as trusts and foundations, private label funds, and private investment companies. Essentially, it is key to consider individual circumstances and requirements before adopting the right tools to achieve optimal benefit.

Proper estate planning is crucial in defining the legacy one leaves behind. It is a complex process involving multiple parties, varying agendas, and potential conflicts of interests, thus making it paramount to work with experienced financial professionals to lay the groundwork early.

GGI member firm
SingAlliance Pte Ltd
Advisory, Fiduciary and Estate Planning
Singapore
T: +65 6303 5050
W: sing-alliance.com
Nikki Cheong
E: nikki.cheong@sing-alliance.com

Nikki Cheong

SingAlliance is an independent asset manager with a presence not only in Singapore, but also Hong Kong and Geneva, specialising in providing wealth management solutions to HNW individuals, families, and institutions. In Singapore, SingAlliance holds a Capital Market Services licence for Fund Management issued by the MAS. **Nikki Cheong** is a Senior Relationship Manager at SingAlliance Singapore with more than 12 years of private wealth management experience in Hong Kong, Geneva, and Singapore. She first joined SingAlliance as a Portfolio Manager specialising in equities, before switching roles in early 2020 to service HNW clients in Asia.

Gifting of QOFs to Grantor Trusts

By Detelina Staneva

The Taxpayer Cuts and Jobs Act created tax incentives to encourage investment in certain disadvantaged communities called Qualified Opportunity Zones (QOZ), and taxpayers may utilise those incentives by investing in a qualified opportunity fund (QOF).

The benefits provided by QOZs include the ability to defer gain on a sale of property to a third party until the earlier of the disposition of the property or 31 December 2026. If the taxpayer holds its investment for at least five years prior to that inclusion date, the gain that needs to be recognised will be reduced by 10%, and by an additional 5% if the property is held for at least seven years. Finally, taxpayers who have held the investment for ten or more years, upon its sale can make an election to increase its basis to its then fair market value.

When it comes to the investor's estate, there are several inclusion events that would require the deferred gain to be included in income. Such events would be a transfer of an interest in a QOF by gift, a change in status of a trust owning a QOF from a grantor trust to a non-grantor trust (unless by reason of death) or vice versa. Important exceptions are gifts to grantor trusts, and death.

Since the deferred gain in a QOF is not eligible for basis step-up at death under sec. 1014, and is considered income in respect of a decedent, it would be preferable to gift the QOF interest to a grantor trust and retain in the estate assets that are eligible for step up. The holding period of the successor in interest in the grantor trust upon death includes the decedent's holding period. So, if the QOF stays in the trust, once the gifted assets meet the ten-year holding period, the donee will be eligible for the basis step up on the sale that eliminates all gain other than the deferred gain. This also eliminates one of the drawbacks that grantor trusts have – the inability to utilise step up in basis.

GGI member firm
Kutchins, Robbins & Diamond, Ltd. (KRD)
Auditing and Accounting, Tax, Advisory, Corporate Finance, Fiduciary and Estate Planning
Chicago (IL), USA
T: +1 847 240 1040
W: krdcpas.com
Detelina Staneva
E: dstaneva@krdcpas.com

Detelina Staneva

KRD Ltd. is a CPA firm that offers a full range of client services, including accounting and software consulting, audit and assurance, tax strategy and preparation, business valuations, and financial planning advisory services. Their team of 80 members have been serving clients in Chicago and the surrounding areas for 30 years. **Detelina Staneva** is a Tax Manager with KRD Ltd., where she specialises in providing middle-market companies and individuals with expert tax guidance and planning opportunities. Her practice includes US, state, and local tax planning and compliance, identifying tax credits and incentives, family wealth, and succession planning.

Kutchins, Robbins & Diamond, Ltd.
CERTIFIED PUBLIC ACCOUNTANTS

Joint Accounts: What Financial Advisors Should Know

By Krystyne Rusek and Lisa Sticht-Maksymec

Joint accounts are created for many reasons: to have shared access to funds, to have a shared place to save funds, to avoid payment of probate tax, or, in some cases, to intentionally make a gift of the funds on death. Financial advisors can play an important role in helping maintain their clients' objectives and reducing litigation over jointly held funds when an account holder dies.

Access to jointly held accounts following the death of one of the account holders will depend on the terms of the account agreement at the time it was set up. Whether the co-owner(s) have the right to keep the money will depend on the intention of the original owner. In Ontario, the right of survivorship is not automatic. Litigation may arise when the estate trustee or family of a deceased do not agree on whether a true right of survivorship of the jointly held funds was intended. The financial institution holding the funds might find itself caught in litigation in several ways: in a motion to preserve the funds, to give testimony about discussions with clients, and to produce evidence in the litigation.

Banks and advisors will often be pulled into estate and capacity litigation. A bank's records will inevitably be collected and scrutinised. Detailed notes are invaluable in assisting a judge in determining the client's intentions with respect to jointly held accounts.

In legal disputes, where advisors had thoroughly discussed matters with their clients, taken supporting notes of the appointment, and recommended that the client obtain legal advice, their evidence was often given significant weight in the courts' determinations.

Financial institutions have a duty to exercise reasonable care and skill. To protect a client's objectives, advisors should consider when the account was made joint, what the relationship is between the joint holders, and why the account was made joint. The intentions of the original account holder, and/or both owners should be documented in writing. Bank documents that are sufficiently detailed can be evidence of the transferor's intent.

It is essential that financial advisors understand the applicable legal principles, take the time to understand their client's intentions, and document those discussions.

GGI member firm
Pallett Valo LLP
Law Firm Services
Mississauga (ON), Canada
T: +1 905 273 33 22
W: pallettvalo.com
Krystyne Rusek
E: krusek@pallettvalo.com
Lisa Sticht-Maksymec
E: lsticht-maksymec@pallettvalo.com

Pallett Valo LLP is one of Ontario's Top 10 Regional Law Firms. The firm practices in the areas of business law, commercial litigation, commercial real estate, construction, insolvency and corporate restructuring, employment and labour, and wills, estates, and trusts.

Krystyne Rusek

Lisa Sticht-Maksymec

Krystyne Rusek is a member of the Estate Litigation Group and Wills, Estates & Trusts Practice. She specialises in estate litigation, acting for both individuals and trust companies in disputes involving estates, trusts, and powers of attorney. **Lisa Sticht-Maksymec** is a member of the Wills, Estates & Trusts Practice and Estate Litigation Group. Her practice encompasses all aspects of estate planning, estate administration, power of attorney/guardianship administration, estate litigation, and applications for guardianship for incapable adults.

PALLETT VALO LLP
Lawyers & Trade-Mark Agents

Taxation of Trusts in Germany

By John Büttner

Trusts are often used as foreign vehicles. Regarding the German tax treatment, which shall be briefly outlined, it is, however, decisive as to whether a trust qualifies as a transparent or non-transparent vehicle. Such qualification is generally made based on the respective trust agreement, along with all other agreements linked to the trust. The more influence the Settlor has, the more likely it is that the trust is deemed to be transparent.

The formation of a non-transparent trust is a donation under German tax law, provided the Settlor is domiciled in Germany, his habitual abode is in Germany, or he is a German citizen who was based in Germany within the last five years prior to the formation of the trust. An unlimited German income tax liability, according to the German Corporation Income Tax Act, may only apply if the seat or the place of management is in Germany. Otherwise, only a limited corporate income tax liability may be applicable.

If the trust distributes income to its individual beneficiaries and if a beneficiary is subject to a German income tax liability, such income will be taxed under a flat rate taxation regime at a tax rate of 25% plus 5.5% Solidarity Surcharge thereon. If the trust retains its earnings, such earnings may nevertheless be subjected to German income tax based upon Section 15 of the German Foreign Tax Act. Such rule generally provides for taxation on a fictitious allocation according to the respective share in the trust, which can also lead to problems in terms of liquidity, as income is taxed that has not actually accrued at the level of the respective beneficiary. Of course, it is a further prerequisite for such attribution of income that the Settlor or the beneficiaries have their domicile or habitual abode in Germany. In addition, the Settlor, his relatives, and their descendants must be entitled to benefit in the trust of at least 50%. In case of beneficiaries subject to an

GGI member firm
FPS
Law Firm Services
Berlin, Dusseldorf, Frankfurt am Main, Germany
T: +49 30 8859 270
W: fps-law.de
John Büttner
E: buettner@fps-law.de

John Büttner

FPS is one of the largest fully independent German law firms, with four offices in Germany. FPS currently employs over 130 lawyers and notaries. One of the firm's core areas of expertise is national and international litigation, as well as dispute resolution. **John Büttner** advises on all areas of commercial taxation under both national and international law, including the law relating to fiscal offences and tax disputes. He has more than 20 years of experience in advising on international taxation, pre- and post-acquisition restructuring, structured products, and investment funds, as well as advising private clients and family-owned companies in all ongoing tax-related matters, including asset structuring and estate planning.

FPS
Legal advice. Made for you.

unlimited tax liability in Germany, the asset accumulation due to the liquidation of a trust is initially subject to German inheritance and gift tax.

If, from an economic point of view, the Settlor can still be qualified as the owner of the assets of a trust, the trust is treated as being transparent. In this case, generated income is taxable either directly at the Settlor's level or at the beneficiary's level according to the general German tax rules. For inheritance or gift tax purposes, immediate taxation of the endowment of the trust can be postponed until any special rights of the Settlor lapse. However, this is only possible in cases of contractual arrangements where the Settlor can require a re-transfer of the assets at any time.

Life Insurance and Wills: Essential and Complimentary

By Rich Risino

When contemplating how best to provide for family members should the unexpected happen, attention typically focuses on cash resources. Life insurance offers the most apparent solution; the cost can be modest, with easily recognised and ascertainable value. But if the premise of life insurance is to secure the future and cater for those left behind, what about the other assets?

Life insurance alone does nothing to ensure the other assets, often significantly more valuable are secured and devolved appropriately; the only way to achieve that is through the putting in place of a will. Where there is no will, the laws of intestacy in England and Wales are such that, depending on an individual's circumstances, the outcome as to who benefits from the assets are often very different to what is expected and certainly different to how heirship functions in civil law jurisdictions.

A will is therefore an essential and complimentary companion to life insurance.

Life insurance can provide short term finance to cover the period

...next page

GGI member firm
Memery Crystal LLP
Law Firm Services
London, UK
T: +44 20 7242 59 05
W: memerycrystal.com
Rich Risino
E: rich.risino@memerycrystal.com

Rich Risino

Memery Crystal LLP is recognised as one of the UK's top law firms in their specialist areas including real estate and tax, and regularly cited in Chambers and The Legal 500. **Rich Risino** is a Senior Associate in Wealth Structuring. He focuses on advising HNWIs, entrepreneurs and their families on asset and investment structuring, income, and capital taxation. Rich project manages instructions on behalf of clients, and often co-ordinates tax advice across several jurisdictions.

MemeryCrystal

immediately following the passing of a family member, and assist with tax liabilities or other liabilities. If structured correctly, it can also lessen the taxable estate.

A will is the perfect instrument to govern how best the family left behind might be looked after.

The thought process to put life insurance in place is not hugely dissimilar to that of putting a will in place: who benefits, what amounts, at what age, and why – all questions relevant to putting a will in place.

A will is hugely relevant for any individual owning UK-sited assets and certainly UK-sited real estate, whether those individuals are domiciled in the UK or not. The time and cost burden of proving non-UK wills and succession certificates is unnecessary, bearing in mind the modest cost of a well-drafted will and sensible life insurance.

Life insurance provides the cash security; a will provides capital protection and preservation – essential companions in estate planning.

The Importance of Having a Family Charter and How to Draft It

By Prof Sergio Guerrero Rosas

The family charter is one of the most important assets that a family business may have. It is a document that clearly defines a family business and provides future guidance to it. The family charter is so valuable that it can be equated to a treaty.

The family charter establishes the definition of the family business and its relationship with all the family members. It identifies the family business legacy left by previous generations and captures the mission and vision for the family members of tomorrow.

The creation of a family charter is an important step to guarantee that both the family and the company are aware of the rules that will guide them and what can be expected of each other. While the adoption of a family charter can be uncomfortable or awkward at the beginning, it can be useful in informing, reassuring, and successfully

guiding everyone who has an active interest in the success of the family business and a personal interest in maintaining peace in the family.

Another benefit of the family charter is that it can serve as a safeguard against potential problems that may arise due to misunderstandings or differences of opinions. The following steps should be considered when creating a successful family charter.

1. Analyse and understand in detail the characteristics of the family business, what makes it unique, and its strengths and weaknesses.

2. Generate trust in order to ensure its success. All members should be made aware of its creation in order to generate a shared conscience by establishing an open communication line that allows all family members to be able to speak openly about any difficulty they may find. This will help everyone to understand its importance and relevance.

3. Meet regularly and maintain an open dialogue, analyse the feedback received from each member, and enable group discussions that allow agreements to be reached efficiently.

4. Once consensus has been reached, move forward in a clear and focused manner, establishing a specific schedule that contains the most viable strategy to achieve the short- and medium-term goals.

GGI member firm
Guerrero y Santana, S.C.
Advisory, Auditing & Accounting, Corporate Finance, Law Firm Services, Tax
Tijuana, Baja California, Mexico
T: +52 333 120 05 38
W: guerrerosantana.com.mx
Prof Sergio Guerrero Rosas
E: sguerrero@guerrerosantana.com.mx

Prof Sergio Guerrero Rosas

Guerrero y Santana S.C. provides its clients with a wide range of tax, legal, and consulting services. The firm has been helping clients – from individuals and small local businesses to major corporations and multinationals – to achieve their smallest aims and grandest ambitions. They are committed to providing specialised, personalised services to all those seeking reliable and up-to-date tax, legal, and business support.

Prof Sergio Guerrero Rosas, Managing Director at Guerrero y Santana, has over 25 years' experience advising companies from SMEs to multinationals, as well as individuals, on tax and estate planning. He is also Global Vice Chairperson of the Trust and Estate Planning Practice Group and Latin American Chairperson of the GGI International Taxation Practice Group (ITPG).

FYI

Trust & Estate Planning

NEWS

Contacts

GGI Global Alliance
Sihlbruggstrasse 140
6340 Baar | Switzerland
T: +41 41 725 25 00
F: +41 41 725 25 01
E: info@ggi.com
W: ggi.com
W: ggiforum.com

Let us know what you think about FYI – Trust & Estate Planning News, we welcome your feedback. If you wish to be removed from the mailing list, please email info@ggi.com

Responsible Editor in charge
of Trust & Estate Planning Contents:
Prof Stefano Loconte
Global Chairperson of the GGI
Trust & Estate Planning Practice Group
E: stefano.loconte@studioloconte.it

GGI member firm
Loconte & Partners,
Studio legale e tributario
Corso della Carboneria 15
70123 Bari
Italy
E: +39 080 572 2880
W: loconteandpartners.it