

# U.S. TAX PLANNING FOR U.S.-CITIZEN OWNERS OF CANADIAN ENTERPRISE

Hodgson Russ acts as U.S. tax counsel to a large, family-owned Canadian enterprise with value in excess of \$500 million with respect to U.S. tax planning for the owner-family members who are U.S. citizens and U.S. residents. Our services to this client include use of cross-border foreign grantor trust structures, special U.S. tax planning with respect to dividends that qualify as tax-free capital dividends in Canada, U.S. tax structuring for dispositions occurring under the Canadian “21-year rule,” and tax planning for structuring of foreign operations to minimize potential adverse U.S. tax consequences under the controlled foreign corporation (CFC) and passive foreign investment company (PFIC) rules.

## **Attorneys**

Thomas Nelson

## **Practices & Industries**

Business Tax

Canada-U.S. Cross-Border

International Tax

International Trusts & Estates