

US Tax Advisory Services

Assisting individuals and their families

Tax planning for individuals and their families with business and investment holdings in a variety of jurisdictions is essential to mitigate double taxation and ensure global compliance.

Income, gift and estate tax issues become infinitely more complex when dealing with multiple tax regimes. PwC, through our specialists in Australia and also through our global network of firms, can help you successfully navigate these regimes and provide you with advice on various structuring and planning opportunities.

Please see below an overview of the services that we provide.

Income Tax Compliance & Planning

Already complicated US and Australian tax rules are further complicated when international tax issues are included. We can assist you in navigating the myriad of international tax issues by:

- Planning for US and Australian taxes
- Preparation of US and Australian tax returns
- US tax compliance for foreign structures, including companies, family trusts, and self-managed superannuation funds
- Filing of informational returns for both US persons and non-residents
- Liaising with the IRS and ATO
- Working with your other advisors to ensure that taxes are considered with any investment or business decision.



Residency and Pre-Immigration Planning

Individuals who are embarking on an international assignment, or are moving to another country for business or personal reasons, need to give consideration to both their home and host country tax regimes and include:

- Simplifying your current business and investment structures
- Review of relevant tax treaties to mitigate double taxation
- Determining the optimal time to establish residency or domicile.



Investments and Tax Planning

Cross-border investments and transactions that are fairly standard in your home tax regime may have unforeseen consequences in a foreign country. These include:

- US & Australian Retirement Planning, e.g. 401(k), 529 Education Savings Plans, IRAs and Superannuation
- US & Australian tax implications of your investments
- Tax efficient investments
- Structuring and reporting of your US and non-US holdings
- Optimal choice of investment vehicle.



Property Ownership & Investment

Before investing in real estate in a foreign jurisdiction it is essential that taxpayers understand both the home and host country implications of their investments. These include:

- Ownership and structure – direct ownership vs. ownership through a domestic or foreign entity
- Income, Capital Gain, Estate and Gift tax planning
- Tax compliance obligations
- Liability exposure
- Informational Reporting.



Estate and Gift Planning

Individuals with investments and business in multiple jurisdictions need to consider their global estate and inheritance tax exposure to ensure that their assets are preserved for future generations and consider:

- Global Estate Tax Exposure Review
- Lifetime gifts to family and charitable donations
- Use of trusts and other entities
- Coordination with your other advisors for worldwide estate planning.



Voluntary Disclosure

The IRS has made significant changes to its offshore voluntary disclosure programs since it was initially introduced. As the implementation of the Foreign Account Tax Compliance Act (FATCA) became effective on 1 July 2014 in Australia, many global financial institutions are now beginning to collect information on US accounts holders to report to the IRS.



If you have any undisclosed financial accounts, or have unfiled US tax returns, we can help you become compliant with your US tax obligations by assisting with the filing of back tax and information returns and also through our liaison work with the IRS.

We can help you

PwC can assist you by working together with your other advisors to provide an end to end solution on your US and Australian international tax matters.

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