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Creating an Effective Back Up Plan

David Lesperance

Many wealthy families are finding themselves caught in the middle of a political wildfire.

- ⇒ Mass shooting epidemic.
- ⇒ Increased violence based on religion, Ethnicity, Political affiliation or sexual orientation.
- ⇒ Legislative gridlock and disagreement with the Direction of local government policy 'Tax the Rich' proposals.



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‘Never drop a crew into a hot zone without having an exit’



Fire Insurance



Fire Escape Plan

FIRE INSURANCE

Fire Insurance: Option 1

Alternative Citizenship

Necessary because passports are the property of the issuing government and can be cancelled at a moment's notice.



7 different ways to acquire 2nd citizenship

- 1 Birth in country
- 2 Parents birth in country
- 3 Lineage
- 4 Religious affiliation
- 5 Naturalization
- 6 Investment / Government donation
- 7 Discretion of Government



FIRE INSURANCE

Fire Insurance: Option 2

Alternative Residence

Necessary to changing tax home by reducing physical presence.



FIRE INSURANCE

Five different ways to acquire a second residence

01

Family
Sponsorship

02

Skilled
Worker

03

Retirement

04

Business
Expansion

05

Investment /
Government
Contribution

An effective Backup Plan considers all the available options

FIRE ESCAPE | BACK UP PLAN

Fire Escape Plan

Financial Planning to minimise tax upon possible departure from current tax home and fulfil future asset protection and succession planning.



FIRE ESCAPE / BACKUP PLANS

Fire Escape Plans typically come in three forms:



In a GO (Get Out) Bag
– ready on a moment's notice



As an Individual Living
Abroad

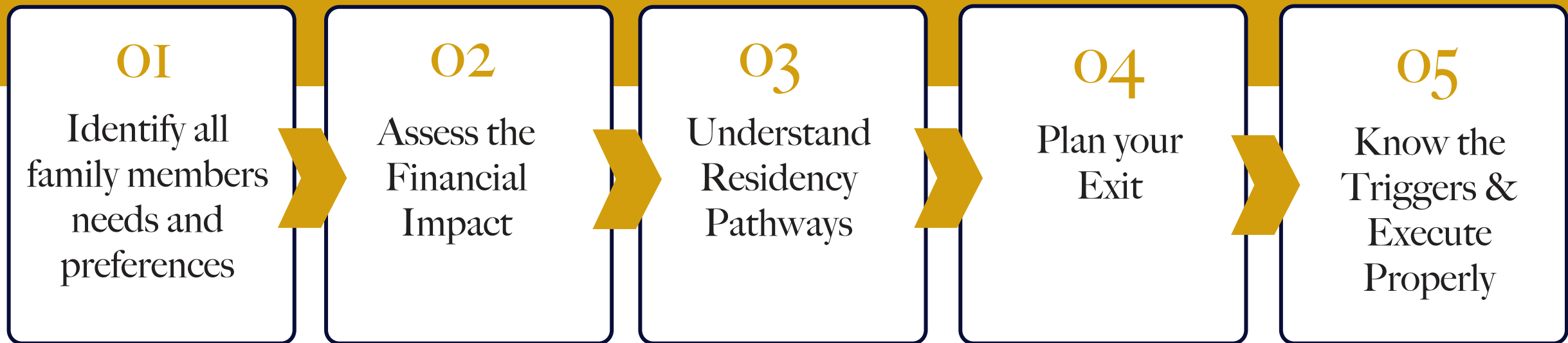


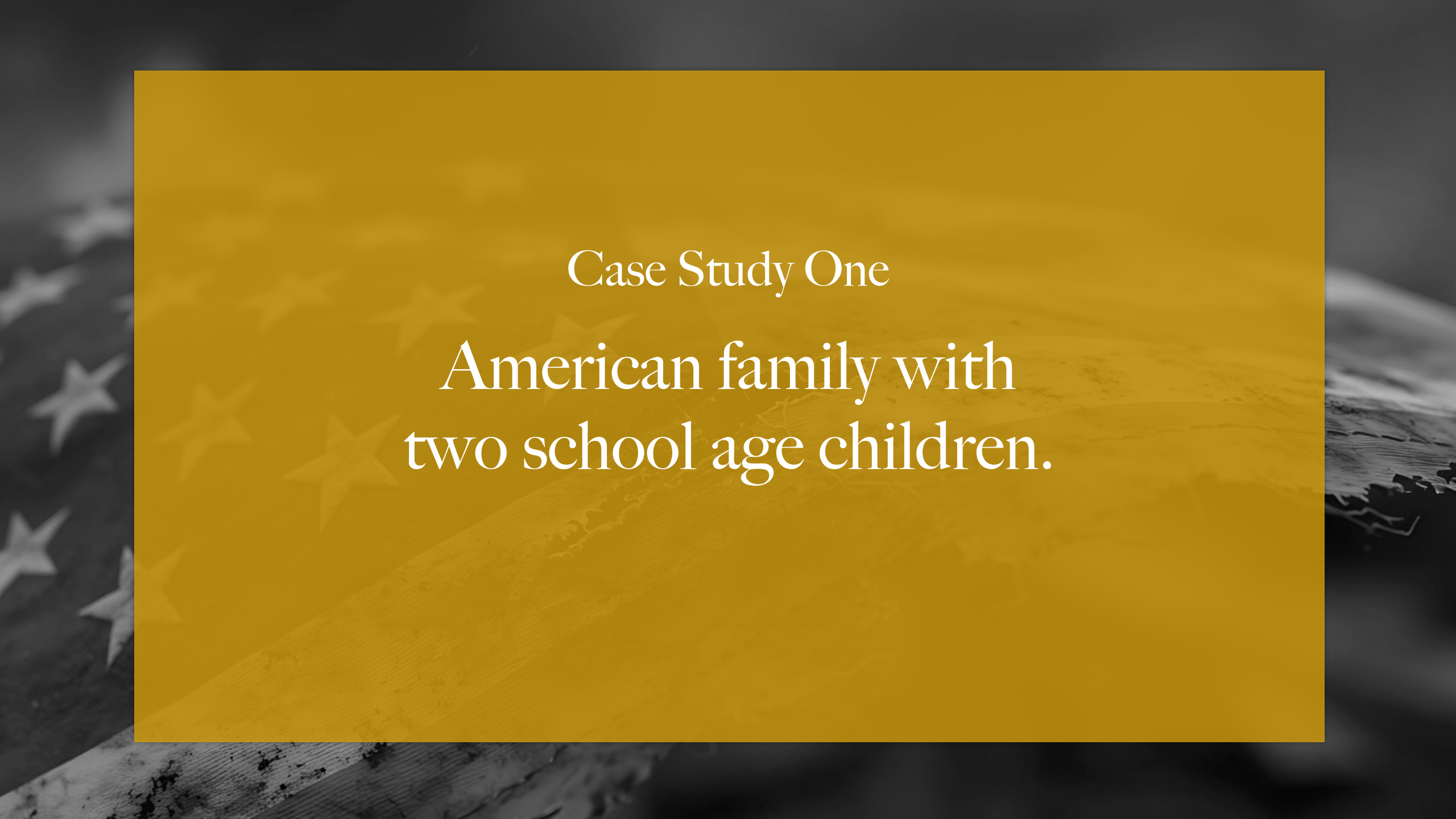
As part of an Expatriation
Strategy

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The Decision-Making Framework

Designing an effective and tax efficient Fire Escape Plan follows a structured framework:



The background of the slide is a close-up, slightly blurred image of the American flag, showing the stars and stripes. A large, semi-transparent yellow rectangle is overlaid on the flag, serving as a background for the text.

Case Study One

American family with
two school age children.



CASE STUDIES

Their 'Fire' Risk

- ⇒ Daily Stress of the mass shooting epidemic
- ⇒ Increasing Antisemitism

While the threat of directly being impacted might be statistically small, there is 100% chance of mental impact of frequent active shooter drills and frequent media reports of horrific shootings and acts of antisemitism.

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CASE STUDIES

The Plan

- **Lineage citizenship** for an EU country citizenship that would give them the right to live, work, or study in 27 different European countries.
- As a backup to the lineage citizenship the family also opted for a **Digital Nomad Visa** which they could obtain in a matter of months.
- They opted not to acquire **Israeli citizenship**, because of **mandatory future military service** for their children.
- They **opened foreign legal and compliant bank and brokerage accounts** in USD, Euros and Swiss Francs;
- They secured **international medical insurance**
- Engaged an **educational consultant** to select appropriate schools
- The relevant **tax treaty** was analyzed to evaluate future foreign tax minimization.
- A **succession plan and asset protection plan** was developed that would protect the family wealth from a future ex-son and daughter in laws and ensure the proper care and protection of minor children should the parents pass early.

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The background features a grayscale city skyline, likely New York City, with prominent skyscrapers. A semi-transparent yellow rectangle is centered over the image. Overlaid on the yellow rectangle and the background are several white upward-pointing arrows of varying sizes and vertical columns of binary code (0s and 1s).

Case Study Two

American same sex couple who are
technology founders.



CASE STUDIES

Their 'Fire' Risk

- ⇒ Increased hostility to LGBTQ Americans
- ⇒ Concerns that the US Supreme Court might overturn same sex marriage laws
- ⇒ Financially – they anticipate a liquidity event in the next two/three years
- ⇒ Concern the Democrats will win a trifecta in the 2028 US General election with potential introduction of 'Tax the Rich' policies

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CASE STUDIES

The Plan

- **Work Permits in Canada** as intra corporate transferees;
- **EU country citizenship** through merit;
- **Residence in New Zealand** under their revamped investor program.
- Their Fire Escape Plan incorporated an **Expatriation strategy** with planning that significantly reduced any exit tax liability allowing them to enjoy a future free of US taxation.
- Pre-immigration tax strategy in several new tax homes
- Homes were purchased in Canada, New Zealand, and Europe which could be seasonally enjoyed and immediately occupied should the long overdue major earthquake or other natural disaster hit California.

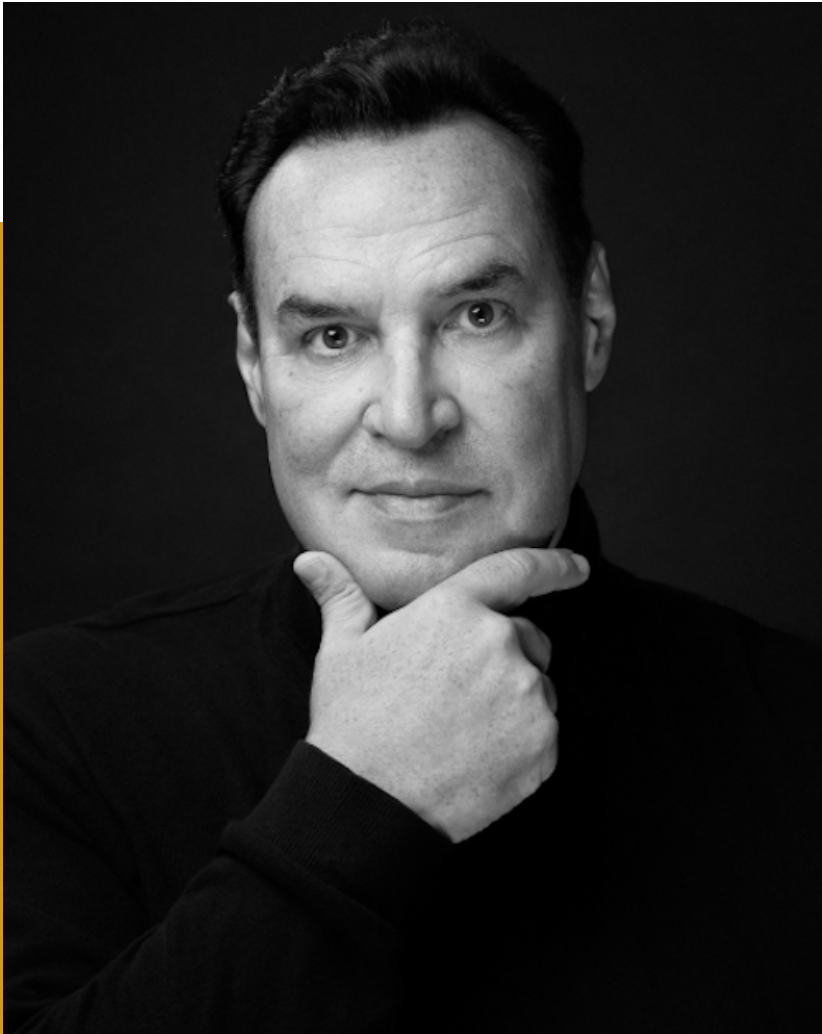


Having a Fire Escape Plan does not mean you must use it. However it does give your family the peace of mind to know they have optionality should they smell smoke. Failure to plan... is planning to fail.

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ABOUT ME

David Lesperance



- Immigration and tax law in DNA
 - Grew up in large border city...family members crossed border to work
 - While law student worked as a Canadian immigration and customs officer
- Over 30 years' helping clients plan their international relocations since being called to the bar in 1990
- Worked with major Canadian law firms, in private practice...now a private consultant
- Have lived and worked in two European countries
- Most important client group has consistently been ultra-high and high net worth Americans
- Now considered one of the world's leading international tax and immigration advisors

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