

IOMSCA and Patrick C Soares

UPDATE ON OFFSHORE TAXATION

Isle of Man

Friday 20 May 2016

Patrick C Soares
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FIELD COURT TAX CHAMBERS

This is a Soares' "Book-Conference" where delegates will get detailed papers prepared by Patrick Soares on the various topics. The notes will be some 200 pages in length.

9.00 Registration

9.30 **Opening Remarks**

9.35 **SESSION 1**
UPDATE ON THE NON-DOM CHANGES AND THE RISE OF THE "GOLDEN SETTLEMENT"; THE 3 LYNCH PINS FOR PLANNING

10.10 **SESSION 2**
URGENT ADVICE TO GIVE YOUR NON-DOM CLIENT NOW (before "D" Day arrives (6/4/2017))

10.40 **SESSION 3**
Optimum house holding structures for non-doms – MULTIPLE SEE-THROUGHS

11.30 Tea

11.50 **SESSION 4**
THE DIVERTED PROFITS TAX AND WHEN TO BE VERY AFRAID

12.05 **SESSION 5**

THE NEW TAX LAND SCAPE FOR OFFSHORE COMPANIES DEALING IN AND DEVELOPING UK LAND – WHAT DOES IT ALL MEAN – DETAILED PAPER AND PRESENTATION – THE FAR REACHING BUDGET CHANGES

- 12.45 **SESSION 6**
UPDATE FOR OFFSHORE INVESTORS IN UK LAND- CGT AND IT- COMPLETING THE PICTURE: ALSO ALL THE NON-RESIDENT INVESTOR NEED TO KNOW ABOUT SDLT – THE SECOND HOME PROBLEM
- 1.15 ²
Lunch
- 2.15 **SESSION 7**
PLANNING AND NON-QUALIFYING SINGLE PREMIUM POLICIES AND PERSONAL PORTFOLIO BONDS AND THE FINANCE ACT 2016 CHANGES AND LINKS WITH THE DDS
- 2.35 **SESSION 8:**
INTEREST RELIEF FOR BORROWINGS TO BUY UK INVESTMENT LAND – DEDUCTING TAX AT SOURCE AND THE ROCKY TIMES AHEAD – VITAL CASE LAW UPDATE. NEW VITAL USES OF THE DDS
- 3.50 Coffee
- 4.20 **SESSION 9**
THE NEW TRANSACTIONS IN SECURITIES CODE AND SALES OF SHARES IN OVERSEAS COMPANIES AND PROBLEM LOANS FROM OVERSEAS COMPANIES. COMPLETES UPDATE ON THE THIRD PARTY REMUNERATION CODE AND EBTS AND SEBTS AND THE FINANCE ACT 2016 CHANGES.
- 5.00 **SESSION 10**
Multi –Mini Case Studies
CURRENT PROBLEMS for offshore trustees and their underlying companies
(topics vary depending on current events but may include)
Protectors
New statement on trustee residence
Loans which backfire
Unexpected dividends
Mixed funds
Liquidations and debts and SDLT
Hidden dividends
Paintings and Planes
S720,727 and 731
Arrangements and associated operations
Dead settlor settlements.
Sales to settlements
OIGs
Gains washed and mixed funds

5.30 **Close of Conference**