

An aerial photograph of London, England, taken during the golden hour of sunset. The River Thames flows through the center, with the Houses of Parliament and the Elizabeth Tower (Big Ben) prominently featured on the left bank. The city skyline is visible in the background under a sky filled with colorful, illuminated clouds.

FUSION

C O N S U L T I N G

International Private
Client Tax Services

Introduction

Globally, legislation is becoming more complicated and tax authorities are adopting a tough stance towards tax planning, thereby increasing the risk of scrutiny.

This scenario has made it imperative for private individuals to seek out specialist tax advisers. We fill this gap by offering specialised assistance to high and ultrahigh net worth individuals and families, business owners and family offices in structuring their domestic and international affairs in an efficient and compliant manner.

We also assist private banks, lawyers, advisers to private clients, trust companies, and family offices



An Overview of our Services

- **Evaluation:** Reviewing your financial position in order to identify the impact of income, capital gains and inheritance taxes and develop strategies to mitigate their impact by maximising reliefs and exemptions
- **Income Tax:** Providing a modern approach to self assessment tax returns compliance, acting as your agent with HMRC, tax fee investigation insurance. income tax planning and strategy.
- **Capital gains tax:** Offering suggestions on a range of tax reliefs such as entrepreneur's relief, as well as exemptions, transferring assets, gifts and the timing of a disposal
- **Inheritance tax:** Defining an optimised approach depending on your financial objectives, such as establishing life assurance and trusts, lifetime gifts and recommendations with respect to drafting or revising a will
- **Liabilities:** Examining whether and how your assets are shielded from taxes under different circumstances and if they are not, suggesting solutions
- **Changes in rules:** Studying and advising you on the impact of modifications to tax rules pertaining to share valuations, dividends, savings and offshore trusts providing bespoke taxation reports tailored to the clients circumstances

How we can help:

If you're coming to the UK...

- **Pre-arrival planning:** Suggesting and implementing efficient organisation of your financial and tax matters to help you manage your financial affairs while living in the UK including registering you for self assessment and dealing with your annual reporting duties to HMRC.
- **Reliefs for tax payers.** There are tax reliefs available to people who intend working on a temporary basis in the UK. We ensure that you can avail of them by talking to your employer, studying the employment contract and making sure that your employment contract ensures your eligibility.
- **Remittances:** Structuring remittances to enable tax-efficient movement of capital to the UK.
- **Property ownership:** Providing expert advice on the implications, structuring and funding of properties owned in the UK
- **Offshore assets:** Providing specialist advice on planning for offshore assets along with existing structures.
- **Inheritance tax:** Advising you about planning for inheritance tax if you are either a permanent resident or have stayed in the UK for a considerable amount of time



If you're leaving the UK

- **Prior planning:** Enabling you to organise your finances in order to manage your and your family's financial needs during your stay outside the UK.
- **Tax compliance:** Guiding you in terms of the destination country's tax rules and how they are related to UK tax legislation and your ongoing UK tax reporting commitments
- **Property matters:** Helping you let out your UK properties while you are away, including the non-resident landlord scheme.



Property

As a property owner, developer or investor, it is essential that you seek the right advice on the tax implications of buying and selling property as well as on constantly changing tax legislation.

How we can help:

- **Structuring:** Suggesting an appropriate arrangement for commercial and residential property ownership and sale
- **Commercial landlords:** Giving expert advice about tax changes and the available tax reliefs such as capital allowances
- **Buy-to-let landlords:** Suggesting available options for dealing with reduced income tax relief on finance costs
- **Multiple residences:** Giving advice on tax matters pertaining to multiple residences
- **Enveloped dwellings:** Advising on compliance requirements and changes in rules
- **International properties:** Identifying tax reliefs on overseas properties



Succession Planning

Succession planning can give rise to complex and sensitive situations that need to be handled with considerable tact. Although tax rules have been modified to render trusts less attractive as mechanisms to manage family wealth, we offer specialised support to families to employ trusts in estate planning. We have vast experience in ensuring that obligations are met, whether acting for a single asset small trust, a portfolio of investments or large trusts controlling shares in private trading companies.

US Expatriates Tax Services

Our highly qualified and experienced London-based tax team specialises in US tax issues for expatriates and offers an entire spectrum of US and UK tax compliance services for individuals which includes:

- **Federal tax return:** Federal & State Tax Return Preparation for Americans living abroad, foreign nationals and those who have recently repatriated to the US.
- **Voluntary disclosures:** If you haven't filed, or didn't know you needed to file, your US tax returns, there is a process to get everything up to date - the streamlined filing procedure. You need to file three years of federal tax returns with all the appropriate forms and schedules and you also need to file six years of foreign bank account reports benefiting from no penalty action.
- **Foreign bank account reporting:** The FBAR is only required if you have a financial interest in one or more overseas financial accounts and the total value of all of the financial accounts combined was \$10,000 or more during any point during the tax year. The FBAR must be filed electronically with the US Treasury Department by June 30th.



Disclosures

There is increasing focus on tax inconsistencies and tax clarity by HM Revenue & Customs (HMRC) and several tax authorities elsewhere, and tax compliance has become more compelling than ever. These authorities expect to be informed if you or your clients are not completely compliant, failing which there could be severe repercussions.

We offer expert and experienced services to individuals, companies and trustees to evaluate their tax situation, voluntarily inform the authorities if there is an anomaly, support you during an investigation and advise you if there is a danger of criminal charges.

If any inconsistencies are found in complicated international tax issues, we are required to inform HMRC, if necessary.

Recently we have helped a number of landlords who have never previously disclosed their rental property income to HMRC. There is a disclosure available called the property let campaign.



Mitch Young

International Private Client
Tax Specialist

Mitch is an International Private Client Tax specialist with a difference. His vast knowledge and entrepreneurial mindset mean he relishes the opportunity to help his clients resolve any tax issue, no matter how difficult it may seem.

Mitch's experience as a Partner at a medium-sized firm of London chartered accountants, places him perfectly to provide insightful specialist advice to clients on Personal and Corporate tax planning. He focuses in particular on Property taxation and serving owner-managed businesses.

Mitch has achieved many accolades throughout his career, including:

- Taxation – Rising Star of the Year Finalist – the Gold Standard of Excellence in the UK tax industry.
- Appointed Tax Partner at the age of 29.
- Featured in The Times, The Independent, The Daily Express.
- Economia 2015 – Voted Number 1 Most Influential Person on Social Media for Finance.



Contact us

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