

PRESENTER



Terry Baucher, Baucher Consulting Ltd, Auckland

Terry is a member of STEP and the United Kingdom Chartered Institute of Taxation. He specialises in advising on tax issues such as Inheritance Tax and Capital Gains Tax affecting clients migrating to or from the United Kingdom. He is the co-author of *Tax and Fairness* published in May 2017.

The statements and conclusions contained in this paper are those of the author(s) only and not those of the New Zealand Law Society. This booklet has been prepared for the purpose of a Continuing Legal Education course. It is not intended to be a comprehensive statement of the law or practice, and should not be relied upon as such. If advice on the law is required, it should be sought on a formal, professional basis.

CONTENTS

CROSS-BORDER TAXATION ISSUES – STEPPING INTO THE UNKNOWN.....	1
INTRODUCTION	1
<i>Scope of this paper</i>	1
<i>Overseas property and the bright-line test</i>	2
<i>A brave new world of tax</i>	2
<i>Residency</i>	3
AUSTRALIA	4
<i>Temporary resident exemption</i>	4
<i>Capital gains inter-vivos disposals</i>	4
<i>Capital gains disposals on death</i>	5
<i>Information sharing</i>	5
PEOPLE’S REPUBLIC OF CHINA	5
<i>Residency</i>	6
<i>Capital taxes</i>	6
<i>Information sharing</i>	6
UNITED KINGDOM	6
<i>Non-doms and the remittance basis of taxation</i>	6
<i>Domicile and inheritance tax</i>	7
<i>Capital gains tax</i>	8
<i>Information sharing</i>	8
UNITED STATES OF AMERICA	10
<i>Capital gains inter-vivos disposals</i>	10
<i>Gift tax</i>	10
<i>Capital gains disposals on death</i>	10
<i>Estate tax</i>	10
<i>Information sharing</i>	11
CONCLUSION	12