
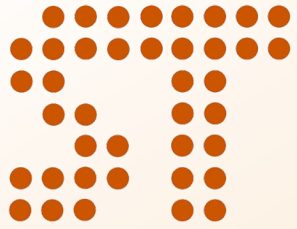


Sey Tax Group



U.S. / IRISH CROSS-BORDER PENSION TAXATION

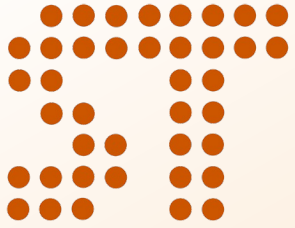


U.S./Irish taxation of cross border pension and retirement income

Nov 27th 2025 – Shelbourne Hotel

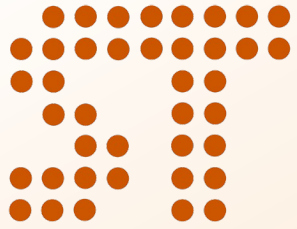


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The Australian Auto-enrollment Experience

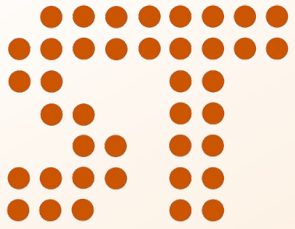
Brian MacNish



Australia vs. Ireland Pension Systems

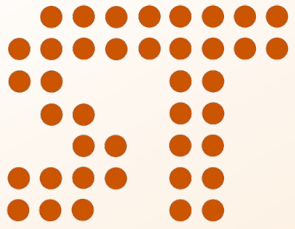
**Superannuation (Australia)
My Future Fund (Ireland)**

**And its potential for the expansion of the Irish Financial
Services sector**



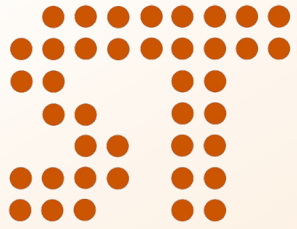
Maturity & Scale

- Australia: Launched 1992
- 30+ years, AUD \$4.5T+ assets
- \$3.5T institutional – \$1T self-managed
- Ireland: Launching 2025
- €20–40B expected in 10 yrs
- Australia: 12% employer mandatory
- Ireland: 6% employee + 6% employer + 2% State (phased in).



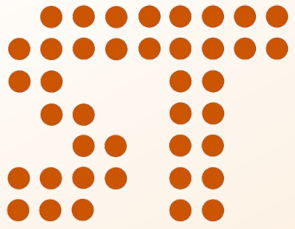
System Architecture

- Australia: Decentralized, competitive funds.
- Ireland: Centralized and State-run with limited investment choices
- Australia: Sophisticated global portfolios.
- Ireland: Simple default funds, lifecycle approach.

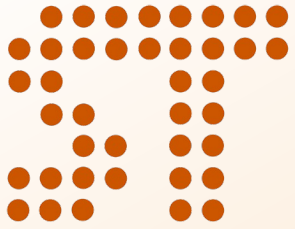


Summary Comparison Table

Dimension	Australia Superannuation	Ireland Auto-Enrolment
Start Date	1992	2025
AUM	AUD \$3.7T+	€20–40B (10 yrs)
Contributions	12% employer	6%/6%/2% phased
Structure	Competitive multi-fund	Centralized CPA
Investment Sophistication	Very high, alternatives	Simple default funds
Domestic Market Impact	Large	Modest early-stage
Choice	High	Limited

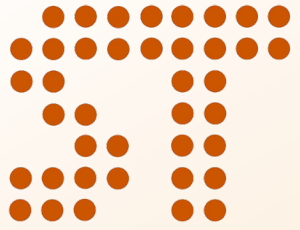


The Role of Superannuation in Building Australia's Financial Services Industry – and Parallels in Ireland's Public Pension System



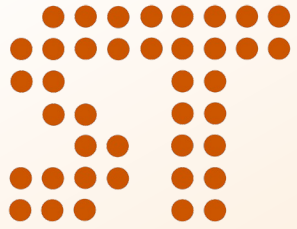
Summary

- Australia's superannuation system transformed its financial services industry.
- Ireland's auto-enrollment system may follow a similar trajectory.
- Over AUD \$4.5 trillion in assets
- Ireland projected to grow to €10-20 bill in 10 years



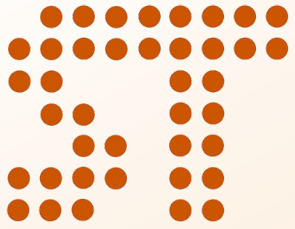
How Superannuation Built Australia's Finance Sector

- Predictable capital inflows
- Stable long-term savings base
- Asset management industry growth
- Infrastructure investment expanded
- Global capital markets involvement
- Attraction of global investment managers to Australia



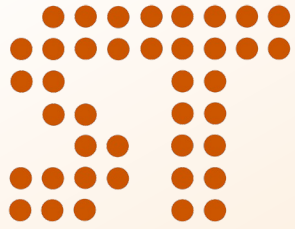
Capital Markets Development

- Deepening of ASX
- Development of the ABX
- Expansion in fixed income
- Improved governance and regulatory standards
- Growth of major funds (AustralianSuper - Hostplus - HESTA)
- Expansion into private equity and alternatives



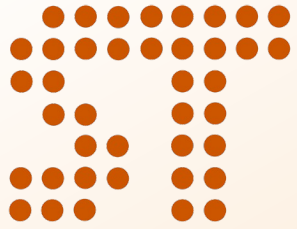
Infrastructure Investment

- Airports, toll roads, ports, renewable energy
- Super funds as global infrastructure leaders
- Ireland's new system is at the beginning of a similar long-term transformation
- 750,000+ new savers
- Equivalent to 9th largest Aussie Super Fund (MLC Super Fund – 758,810 members)



Scale Potential

Rank	Super fund	Total number of member accounts
1	AustralianSuper	3,672,070
2	Australian Retirement Trust	2,532,770
3	HOSTPLUS Superannuation Fund	2,183,170
4	REST Super	2,147,950
5	Aware Super	1,245,530
6	HESTA	1,099,220
7	Mercer Super Trust	1,061,990
8	Cbus Super	925,410
9	MLC Super Fund	758,810
10	UniSuper	704,440



Parallels with the Aussie experience - Impact on Ireland's Capital Markets & Infrastructure

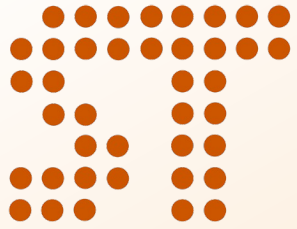
- Compulsory capital formation
- Expansion of Irish asset managers
- Capital market deepening
- Infrastructure finance potential
- Growth in domestic asset management
- Need for custodians, administrators, fintech
- Expansion of financial advisory
- Significantly positive social impact



Conclusion

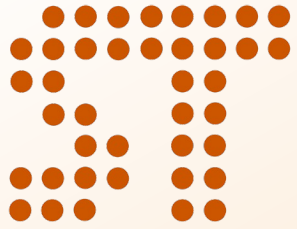
Ireland is positioned to follow a similar transformative path as Australia's superannuation-driven financial sector growth – on balance, that's a good thing for most people...

...except for those who fall through the cracks...



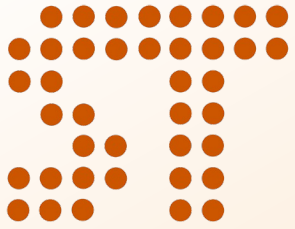
Pension & Retirement Income Tax Treatment

Stephen Casey



Who is affected

- US citizens
- Un-revoked green card holders
- Other: substantial presence test



-
- My Future Fund
 - PRSA
 - Defined Benefit
 - Defined Contribution
 - State pension – Ireland
 - Irish Government pension
 - US Social Security
 - US Government pension

My Future Fund

- U.S. tax year: TY 2026 and later (first contributions begin January 1, 2026)
- Employee is a U.S. citizen, Irish-resident employee who is auto-enrolled in Ireland’s **My Future Fund** (“MFF”) workplace pension.
- MFF facts (phase-in schedule): each of the employee and employer contributes 1.5 % of pay in 2026, rising to 6 % by 2035; the Irish Government tops-up 0.5 %–2 % of pay, subject to the €80,000 pay cap.

How the IRS Classifies the Scheme

Funded employees’ trust under IRC §402(b).

- The MFF is financed and invested by an independent Irish authority, so it is a *funded* plan.
- It is not “created or organized in the United States,” so it cannot qualify under §401(a).
- A funded foreign plan that is **broad-based and non-discriminatory** is therefore taxed under **§402(b)(1)/(2)** rather than §402(b)(4).

Not a grantor trust (no single U.S. owner) and therefore normally outside the scope of Forms 3520/3520-A. Revenue Procedure 2020-17 separately exempts “tax-favoured foreign retirement trusts” from those forms; Irish workplace pensions such as MFF meet the listed criteria.

Annual U.S. Tax Treatment

Cash flow into the account	U.S. treatment in the year contributed
Employee deferral (1.5 % → 6 %)	Already taxable wages – no U.S. deduction. Employee still may exclude/credit the Irish PAYE on that wage under §911 or the foreign-tax-credit rules, but the contribution itself gives no U.S. benefit.
Employer contribution	Included in gross income when vested (normally immediately) under §402(b)(1); taxed as additional wage compensation.
Irish Government top-up	Treated like a supplemental employer contribution – also includible under §402(b)(1). (Nothing in the Code re-characterises it as tax-free.)
Plan earnings (interest/dividends/capital gains inside MFF)	Because the plan is non-discriminatory, deferred until distribution under §402(b)(2).

Practical payroll point: The employer should show its own and the State top-up amounts on the employee’s year-end Irish payslip; the U.S. taxpayer picks them up as extra foreign wages on Form 1040 **line 1** (and on Form 2555 or 1116 as relevant).

Later Distributions

At retirement (currently Irish State-pension age 66) the lump-sum or annuity is a “foreign pension”:

- Entire taxable portion is ordinary income on Form 1040 lines 5a/5b (apply the annuity exclusion ratio of §72 for the employee’s own after-tax basis – i.e., the already-taxed contributions and taxed employer/government deposits) – but PFIC rules may apply.
- Article 18(1)(a) of the U.S.–Ireland treaty allows Ireland to tax the payment; the U.S. must give a foreign-tax credit (Form 1116) so as to avoid double taxation.

PFIC & Investment-Income Issues

The underlying Irish pooled funds are almost certain to be foreign mutual funds, hence PFICs under the 75 % income / 50 % asset tests – see later

U.S. Reporting

Form	Required?
FBAR (FinCEN 114)	Yes – annual maximum value of the individual’s MFF sub-account if > \$10,000 aggregate with other foreign accounts.
Form 8938 (FATCA)	Yes, if total foreign financial assets exceed the filing threshold (\$200k single / \$400k MFJ for expats).
Forms 3520 / 3520-A	No , per Rev. Proc. 2020-17 exemption for tax-favoured foreign retirement trusts.
Form 8621	Yes as underlying fund is a PFIC if value exceeds \$25,000

U.S. federal-tax treatment of the main Irish retirement vehicles for a U.S. citizen who is resident in Ireland (tax year 2025)

Irish arrangement (closest U.S. analogue)	IRS classification	When contributions are taxed in the U.S.	How annual growth is taxed	How distributions are taxed	Information returns that may be required
My Future Fund (Irish auto-enrolment DC account)	Foreign pension – non-exempt employees’ trust under § 402(b)	Employee deferrals: after-tax in the U.S. Employer match and State “top-up”: taxable U.S. wage income when vested	Deferred (no annual U.S. tax for a non-HCE in a non-discriminatory plan)	Ordinary income except for unrecovered basis; 10 % § 72(t) early-distribution surtax can apply. Possible PFIC	FBAR and Form 8938; no Form 3520/3520-A if it meets Rev. Proc. 2020-17. Form 8621
PRSA (Personal Retirement Savings Account)	If self-funded only: foreign grantor trust If employer-funded: § 402(b) employees’ trust	Your own payments: after-tax Employer payments: taxable compensation when vested	Grantor-trust PRSA: you pick up realised income each year 402(b) PRSA: deferred	Grantor-trust PRSA: mostly return of basis 402(b) PRSA: ordinary income with basis recovery / or PFIC is applicable	FBAR and Form 8938; Form 8621 for any PFICs; Form 3520/3520-A usually not required under Rev. Proc. 2020-17 Form 8621
Employer-sponsored Irish DB scheme	§ 402(b) non-exempt employees’ trust	Employer and employee contributions taxable when vested (often nothing until vesting)	Deferred unless you are a highly compensated employee (HCE) in a discriminatory plan	Ordinary income with basis recovery; § 72(t) surtax can apply. Possible PFIC	Form 8938 (no FBAR, no 3520). Form 8621 possibly

Irish arrangement (closest U.S. analogue)	IRS classification	When contributions are taxed in the U.S.	How annual growth is taxed	How distributions are taxed	Information returns that may be required
Employer-sponsored Irish DC scheme (other than PRSA/My Future Fund)	§ 402(b) employees' trust	Same as DB scheme	Deferred if not HCE	Same as My Future Fund	FBAR and Form 8938. Form 8621
Irish State Pension (social-welfare old-age pension)	Foreign social-security benefit	n/a	n/a	Not reportable on U.S. return	Report nothing on FBAR/8938
Irish public-sector (civil-service, Garda, HSE) pension	Government-service pension (treaty Article 19)	—	—	Ordinary income in the U.S. with basis recovery	Form 8938 possibly
U.S. Social Security	U.S. social-security benefit	—	—	Not taxed by the United States; taxable only in Ireland	Report nothing on FBAR/8938
U.S. federal or state civil-service pension	U.S.-source pension	—	—	Ordinary income under § 72 on the U.S. return	None of the foreign-asset forms

1. Foreign plans cannot be “qualified.”

An Irish plan cannot satisfy § 401’s domestic-trust requirement, so every Irish occupational plan falls under § 402(b) unless it is a personal plan classified as a grantor trust.

2. Employer vs. employee money.

Employer and State contributions vesting in you are U.S. taxable compensation. Your own contributions are after-tax and create basis.

3. Inside build-up.

In a non-discriminatory § 402(b) plan you defer U.S. tax on earnings until payout. Grantor-trust PRSAs are taxed currently on their realised income.

4. Distribution rules.

At retirement you recover basis first; the balance is ordinary income and may face the 10 % early-distribution surtax if withdrawn before 59½ without an exception.

5. Information reporting.

- FBAR and Form 8938 apply to accounts you control (PRSA, DC accounts, My Future Fund).
- Defined-benefit promises are not FBAR accounts but are specified foreign assets for Form 8938.
- Form 3520/3520-A is waived for most Irish retirement plans under Rev. Proc. 2020-17.
- Form 8621 is needed if a grantor-trust plan holds non-U.S. mutual funds.

6. Treaty relief.

- Article 18(1)(a) pensions: Ireland has the primary right; the U.S. still taxes its citizens, so claim a foreign-tax credit.
- Article 18(1)(b) social-security benefits: exclusive taxing right goes to the country of residence, and Article 1(5) removes the saving-clause override. Consequently, U.S. Social Security received by a U.S. citizen resident in Ireland is **not** taxed by the United States.
- Government-service pensions (Article 19) revert to dual taxation once the saving clause is applied.

Practical compliance checklist

1. While working

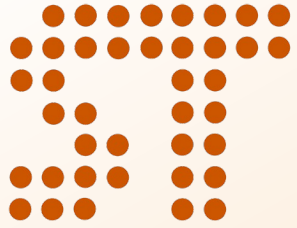
- Include vested employer and State contributions in U.S. wages.
- Track your own after-tax contributions to establish basis.
- File FBAR and 8938 as required; skip 3520/3520-A if the plan meets Rev. Proc. 2020-17.

2. In retirement

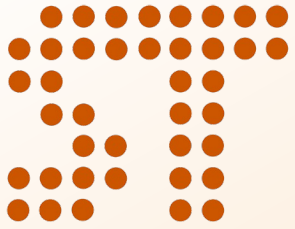
- Use the Simplified Method (Publication 575) to compute basis recovery for each Irish pension.
- Report private-sector or public-service Irish pensions on Form 1040 lines 5a/5b; claim foreign-tax credits for Irish PAYE.
- Do **not** include either the Irish State Pension or U.S. Social Security on your U.S. return; both are taxable only in Ireland.

3. U.S. federal, state or military pensions

- Continue to report them fully on the U.S. return; claim an Irish credit if Ireland taxes them.



Coffee Break



-
- **Revenue correspondence – Summer 2025**
 - **401K**
 - **Individual Retirement Arrangement - traditional**
 - **Individual Retirement Arrangement – Roth**
 - **US non qualified plans**
 - **US Government pension**
 - **US Social Security**

U.S.-Source Retirement Income for Individuals Living in Ireland (Tax Year 2025)

Type of U.S. retirement income	IRS view if the payee is an Irish-resident **NRA** (non-citizen, non-green-card)	Irish tax on that NRA	IRS view if the payee is a **U.S. citizen/green-card holder** resident in Ireland
1. Employer-sponsored qualified plans (401(k), 403(b), U.S. defined-benefit pensions)	No U.S. tax once the treaty claim is made; 30 % withholding reduced to 0 % with Form W-8BEN.	Fully taxable at Irish marginal rates; subject to USC, not PRSI. Credit available for any residual U.S. withholding.	Ordinary income: basis recovered with the simplified method; 10 % early-distribution surtax may apply before age 59½.
2. Traditional IRA distributions	Same treaty exemption and 0 % withholding as row 1.	Same Irish treatment as row 1.	Fully taxable in the United States; early-distribution surtax can apply.
3. Roth IRA – qualified distribution (age 59½ + 5-year rule)	Exempt from U.S. tax; no withholding.	Maybe exempt from Irish tax under section 200 TCA 1997.	Exempt from U.S. tax.

Type of U.S. retirement income	IRS view if the payee is an Irish-resident **NRA** (non-citizen, non-green-card)	Irish tax on that NRA	IRS view if the payee is a **U.S. citizen/green-card holder** resident in Ireland
4. Non-qualified private U.S. annuities	Treaty allocates taxing right to Ireland → no U.S. tax with treaty claim.	Taxable in Ireland on the income element; capital element ignored.	Taxed by the United States on the income element under the annuity rules.
5. U.S. federal, state, or local government-service pension (OPM, military, state teachers, etc.)	If the retiree is an Irish national → taxable only in Ireland. If not an Irish national → taxable only in the United States (0 % withholding available with W-8BEN).	Tax applies only when Ireland has the taxing right (that is, when the retiree is also an Irish national); otherwise not taxable in Ireland.	Fully taxable by the United States.
6. U.S. Social Security	Not taxed by the United States; taxed only in Ireland.	Taxed like the Irish State Contributory Pension; USC-exempt; no PRSI.	Saving-clause carve-out means no U.S. tax.

Practical Pointers

• **Forms for payers**

- NRA: give Form W-8BEN to claim 0 % treaty withholding for rows 1, 2, 6.
- U.S. citizen/green-card holder: give Form W-9; normal U.S. reporting applies.

• **U.S. filing obligations**

- NRA: generally no U.S. return if treaty fully eliminates U.S. tax; file Form 1040-NR only when row 5 is taxable.
- U.S. citizen/green-card holder: always file Form 1040; attach Form 1116 to claim Irish foreign-tax credits.

• **Irish compliance**

- File Form 11; include all taxable items.
- Claim credit for any U.S. tax that remains after treaty relief (mainly rows 1, 2, 6 for citizens/green-card holders).

• **Information reporting**

- U.S. accounts are not foreign financial accounts, so they are not reportable on FBAR or Form 8938. Irish-resident U.S. persons must still report any non-U.S. pension or investment accounts on those forms.

When Does Article 19 Apply? — Definition of a “Government Pension” in the U.S.–Ireland Income-Tax Treaty

Article 19 of the 1997 Ireland-U.S. convention covers only a narrow class of pensions. A retirement benefit is a “**government pension**” – and therefore taxable under Article 19 instead of Article 18 – when all of the criteria below are met.

Treaty Criteria

Requirement	Where spelled out	Practical meaning
1. Payor is a Contracting State, or a political subdivision or local authority, or a fund they create	Art. 19 ¶2(a)	The pension is paid either directly from the public treasury (pay-as-you-go) or out of an officially sponsored government plan.
2. Reason for payment: it is “in respect of services rendered to that State / subdivision / authority.”	Art. 19 ¶2(a)	The recipient must have been a public-sector employee.
3. No commercial connection: if the services were rendered “in connection with a business carried on by” the government, Art. 19 does not apply.	Art. 19 ¶3	Pensions of government-owned enterprises that operate commercially (e.g., a State airline) fall back to Art. 18.
4. Paid from a qualified governmental entity’s fund (optional shortcut)	Art. 3 ¶1(j) & Technical Expl.	Payments from a fund that exists solely to provide public-service pensions automatically satisfy (1) and (2).
5. Not a social-security benefit	Technical Expl. to Arts. 18 & 19	State old-age pensions are governed by Art. 18 ¶1(b), not Art. 19.

If all five tests are met, the pension is taxed **only by the paying State** unless the retiree is both 1) resident **and** 2) a **national** of the other State; in that case the taxing right shifts to the State of residence (Art. 19 ¶2(b)).

Common Examples of Government Pensions

Jurisdiction	Pension plan / payor	Why Article 19 applies
United States	<ul style="list-style-type: none"> • Civil Service Retirement System (CSRS) basic annuity • Federal Employees Retirement System (FERS) basic annuity • U.S. military retired pay • Federal Thrift Savings Plan annuity if paid from FERS basic benefit fund • State Teachers' Retirement Systems (e.g., CalSTRS, NYSTRS) • State Police & Fire, municipal police or firefighters' pensions 	Paid from federal, state or local public funds for services as a government employee
Ireland	<ul style="list-style-type: none"> • Irish Civil Service Pension (pre-2013 schemes) • Single Public Service Pension Scheme (career-average, post-2013) 	Civil and public servants; benefits financed from Exchequer
	<ul style="list-style-type: none"> • Teachers' Superannuation Scheme 	Pay-as-you-go scheme for State-school teachers
	<ul style="list-style-type: none"> • Garda Síochána (police) Pension 	Police service pension paid out of State funds
	<ul style="list-style-type: none"> • Defence Forces Pension Scheme 	Military service pension
	<ul style="list-style-type: none"> • HSE / public-hospital nurses' pension 	Health-service employees; Exchequer-funded
	<ul style="list-style-type: none"> • Local-authority staff pension funds 	Funded or pay-as-you-go plans run by county or city councils

What Is ****Not**** a Government Pension?

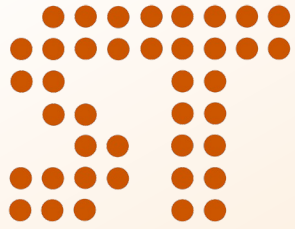
1. **Private-sector or semi-state company schemes** that operate commercially (e.g., pensions from a State-owned utility that competes in the marketplace). These generally fall under Article 18 instead.
2. **Social Insurance benefits** such as U.S. Social Security or Ireland's State Pension – these are expressly assigned to Article 18 ¶1(b)
3. **Occupational pensions of private employers** (defined-benefit or defined-contribution) – always Article 18.

Tax Consequences When Article 19 Applies (high-level)

- **Primary taxing right:** the paying State (Ireland or the United States).
- **Exception:** if the retiree is both resident **and** a **national** of the other State, only that other State may tax.
- **Saving clause:** the United States may still tax its own citizens on worldwide income; thus a U.S. citizen receiving an Irish government pension is taxed by **both** countries, with foreign-tax-credit relief under Article 24.

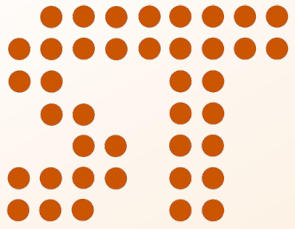
Summary

A pension is a “government pension” under Article 19 when it is paid by, or out of funds created by, a national, state, county, city or similar public body **for services the retiree performed as a public servant** and not in connection with a commercial business. Classic examples are U.S. federal civil-service or military pensions and Irish public-service or local-authority pensions; private-sector or purely commercial State-owned enterprise plans do not qualify.



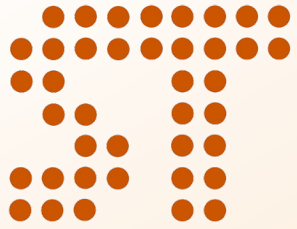
Introduction

- U.S. Social Security paid to someone who lives in Ireland is governed by three rulesets:
 - **Irish domestic law,**
 - **the 1997 Ireland–U.S. Double-Taxation Convention (Article 18(1)(b)), and**
 - **U.S. law on non-resident benefits.**
- Ireland generally claims the sole taxing right when the recipient is Irish resident, but the remittance basis can narrow that charge for non-domiciled residents. The United States withholds nothing if the treaty exemption is invoked, yet it can still tax benefits of citizens who do not claim the treaty or who fail the treaty tiebreaker. Correct treatment therefore hinges on residence, domicile, remittance flows, and timely filing in both jurisdictions.



Checklist

- Days in Ireland this year and last (183/280-day test)
- Ordinarily-resident yet
- Irish-domiciled or non-domiciled
- If non-domiciled, have you remitted any of the benefit or derived funds
- Are you a U.S. citizen/green-card holder (still worldwide-taxable)
- Have you filed Form 1040 (and Form 8833) or, if non-citizen, received SSA-1042S
- Does the treaty tie-breaker leave you Irish-resident or U.S.-resident
- Have you entered the correct figure on Form 11/Form 12/MyAccount
- Have you claimed any Irish credit for U.S. tax actually paid
- Are you subject to withholding under U.S. non-resident rules (if treaty not claimed)



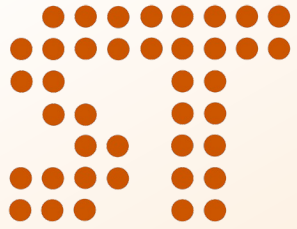
Where the income is taxed

- Irish-domiciled residents: entire benefit taxed in Ireland under Schedule D Case III (s.18 TCA 1997).
- Non-domiciled residents: taxed only on amounts remitted to Ireland (ss.70–71).
- Treaty assigns exclusive taxing rights to Ireland, overriding the U.S. saving clause for Social Security, unless the recipient is not Irish resident under the treaty.



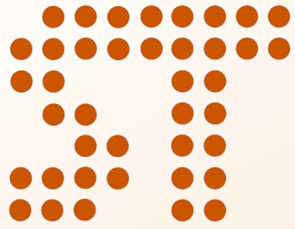
Forms and Declaration

- *United States*
- Report gross benefit on Form 1040-line 6a; attach Form 8833 to claim treaty exclusion (line 6b “0”). Non-citizens with no other U.S. income usually have Form SSA-1042S and no Form 1040-NR requirement.
- *Ireland*
- Self-assessment – Form 11, Panel F, line 315 “Foreign pensions” (gross or remitted amount).
- **PAYE** – MyAccount “Declare foreign pension”; credits auto-adjust.
- **Low-level non-PAYE income – Form 12, Foreign Income section.**



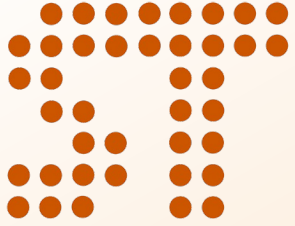
When the U.S. still taxes the benefit

- The U.S. may impose tax under IRC § 86 if (a) the recipient is not treaty-resident in Ireland (e.g., fails the permanent-home or centre-of-vital-interests tests), or (b) the recipient is a U.S. citizen who does not disclose the treaty position on Form 8833, or (c) if Article 24(6) of the treaty applies. Non-citizens resident in Ireland avoids U.S. tax automatically once the SSA recognizes an Irish address.



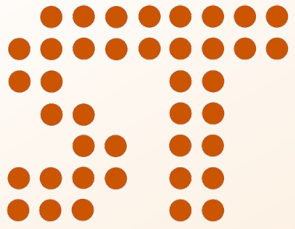
Remittance basis for non-domiciles

-
- Non-domiciled but Irish-resident individuals are assessed on foreign pension income—including U.S. Social Security—only to the extent it is remitted, imported, or used in Ireland during the year. Pure capital remittances and sums kept offshore escape tax. Mixed-fund rules treat transfers as income first. Article 24(6) of the treaty respects the remittance basis by limiting Irish relief to income remitted.
-
- Revenue Manual states U.S. Social Security is “foreign pension income” chargeable under s.18 and expressly confirms that non-domiciled residents may apply the remittance basis in ss.70–71. The same treatment is reflected in the Form 11 Help sheet and in public TCA guidance.



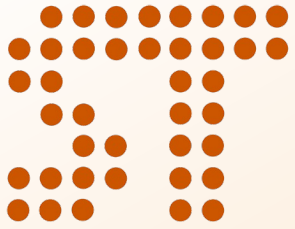
Accessing Additional Help

Darragh J Delany



Enquiries

- Contact Information on [SeyTaxGroup.com](https://www.SeyTaxGroup.com)
- Offices
 - Nassau Street, Dublin
 - Wall Street, New York
- Help Widget
 - Currently raises enquiry
 - Chat Agent rolling out through December & New Year
 - Chat AI powered to help identify issues and connect faster
 - **Factual information** only
 - No Opinions
 - Provide answers if possible – Route to experts if needed



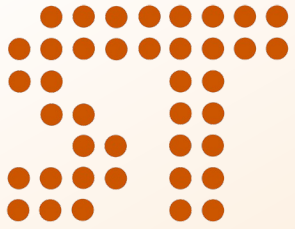
Web Site Public Content

- Frequently Asked Questions
 - Addressing the most common issues for U.S. taxpayers in Ireland
 - Aimed at enabling self-service where possible
- Announcements
 - Events
 - Sey Tax Notes
 - Video Shorts
- Services
 - Information split by segments and service types
 - Personal
 - Business
 - Practitioner
 - Complex Private Clients



Client Portal

- Issue management and Information system
- Raise and track multiple issues in conversational flow
- Organize issues by type
- Additional content based on user entitlements
- AI driven inventories to gather and organize data
 - EU AI & GDPR Compliant
 - Aim to identify issues and clarify facts to minimize professional costs
 - Free and Paid services
- Easy & Free sign up



Inventories

- **Conversational AI tools to gather facts and determine intentions**
- **Separate factual information from professional advice**
- **Current Roadmap (initial functionality – evolving continuously)**

Now

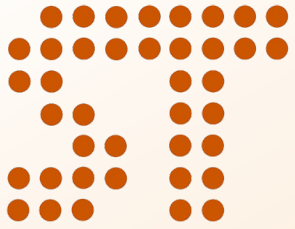
**Domicile
ITIN
Estate Planning**

Next

**Retirement Funds
U.S. Estates/Probate
FATCA
PFIC**

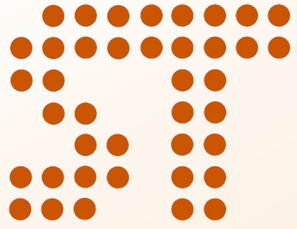
Later

**U.S. Business Setup
(multiple modules)
Expatriate Tax Planning
Migration Planning**



Example Inventory Scope

- Domicile
 - Non-statutory legal status determines “Home”
 - Basis for determining certain key tax matters e.g. for U.S./Ireland Estate Tax Treaty
 - Different Types
 - Domicile of Origin
 - Domicile of Dependency
 - Domicile of Choice
 - Domicile of Choice allows for significant tax status changes
 - Many evidential factors to assess in drafting opinion
 - Automation assistance reduces otherwise costly overheads
 - Actual costs focused on professional expertise over administrative



Q&A