

EDINBURGH TAX NETWORK

Seminar | Thursday 29th September 2016

Edinburgh Tax Network

The Edinburgh Tax Network was formed in 2009 as a means of promoting the tax profession, irrespective of the actual qualifications held, through joint CPD and networking events. The organising committee consists of representatives from:-

- The Chartered Institute of Taxation (Scotland Branch)
- The Faculty of Advocates Trust, Fiduciaries and Executries Group (TrustBar)
- Institute of Chartered Accountants Scotland (ICAS)
- Society of Trust & Estate Practitioners Scotland (STEP Scotland)
- ICAEW Scotland

For further information, or to volunteer to present at events, please contact Richard Johnston (CIOT/ ATT) on edinburgh@tax.org.uk or Derek Francis (TrustBar/ STEP/ CIOT) via

clerks@terrafirmachambers.com



Postponing/Avoiding IHT and CGT on Liferent Trusts Vesting in Fee: pre-22nd March 2006 IIPs & IPDIs – with HMRC's Blessing



Derek Francis, LL.B., CTA(Fellow), Advocate, Terra Firma Chambers,
Barrister, Temple Tax Chambers, Chartered Tax Advisor

- ◆ Kicking absolute entitlement & IHT/CGT on terminating pre-22nd March 2006 IIPs into the long grass
- ◆ Using powers of Advancement/Appointment/ Judicial Variation to "stretch" the IIP
- ◆ *Wyndham v Egremont* [2009] EWHC 2076 Ch. D
- ◆ The Accord and Minutes of meeting between the Tax Faculty of the ICAEW and HMRC - *Wyndham* is right - the planning works!

.... & if there's time:

- ◆ Limits to doing that consensually under the Rule in *Gray v Gray's Trs.* (1877) 4R.378 Lord Gifford @ 383/*Saunders v Vautier* (1841) 4 Beav. 115.
- ◆ New DOTAS IHT hallmark and its effect on such and other planning.

When | Registration, Tea & Coffee 12.30pm | Seminar start 1pm

Where | The Mackenzie Building, Old Assembly Close, Edinburgh, EH1 1QX

1 Hour of CPD | There is no charge for attending however prior booking is necessary.

To reserve a space please call 0131 260 5606 or email seminars@terrafirmachambers.com

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