

Industry Insights

It's Personal (and Business)

How is My Wedding Anniversary Business Related?

Nine years ago today in *A Little White Chapel* in Las Vegas, my incredible wife Nina said, "I do". No doubt, I was the luckiest man in town that night (and every day and night since), but how is this business related? It turns out our love story has a lot to do with planning for Global Citizen clients.

Changes in Profile Changes the Planning

High- and Ultra-High Net Worth Global Citizen clients often have more complex profiles than "typical" U.S. citizen resident clients.

Wealth profiles can include businesses, investments, and real estate holdings in multiple countries. Family members often have citizenship and/or residency status in multiple countries as well. Touching multiple jurisdictions changes the planning needs and potential solutions.

Nina was born and raised in São Paulo, Brazil. For most of our time together, she was a Brazil citizen and U.S. permanent resident (i.e., a Green Card holder), but not a U.S. citizen.



- U.S. Citizenship and Immigration Services ("USCIS") issues approximately one million Green Cards annually. According to the [Office of Homeland Security Statistics](#), in 2023 the top 10 countries from which new U.S. permanent residents emigrated were:
 1. Mexico
 2. Cuba
 3. India
 4. Dominican Republic
 5. China
 6. Philippines
 7. Vietnam
 8. Brazil
 9. Afghanistan
 10. Colombia
- U.S. permanent residents are entitled to the same unified gift and estate tax exemption as U.S. citizens (\$13.61MM in 2024 but sunseting on 12/31/25).
- However, for non-U.S. citizen spouses, the unlimited marital deduction is not available such that annual gifts are limited (e.g., \$185,000 in 2024, \$190,000 in 2025).
- Bequests to a non-citizen spouse are likewise limited. If a U.S. citizen predeceases a non-U.S. citizen spouse and the amount of the estate exceeds the available lifetime exemption, U.S. federal estate tax will be payable on the excess estate left to the non-citizen spouse unless: (a) the surviving spouse becomes a U.S. citizen before the estate tax return is filed or (b) the excess bequest is transferred to a "qualified domestic trust" (or "QDOT"). (NOTE: QDOT planning is complicated and beyond the scope of this piece.)

Nina proudly became a U.S. citizen in 2023. While this important event was not motivated by tax, it changed our potential tax exposure and planning needs. Changes in a client's personal and/or wealth profile often require changes to the planning solution. **Ongoing review is critical to avoid unexpected and unwanted results.**

Immigrants and the Entrepreneurial Spirit

Like so many hard-working immigrants, Nina is an entrepreneur who owns and runs her own growing aesthetics spa. (Shameless plug: www.ninadifiori.com)

According to a September 9, 2024 report by [American Immigration Council](#), **46%** (or 230 companies) of the **2024 Fortune 500** list of companies were founded by immigrants or their children.

- The ten companies added to the Fortune 500 list in 2024, half of which were founded by immigrants, had \$8.6 trillion in combined revenue in 2023. This exceeds the GDP of many countries, including Japan, Germany, India, and the UK.
- Not surprising if you read our recent post about foreign purchasers of U.S. residential real estate (which you can find [here](#)), the top 3 U.S. states from that list are also found in the top 5 list of U.S. states where these new Fortune 500 companies are headquartered:
 1. New York
 2. **California** (#3 on R.E. list)
 3. **Texas** (#2 on R.E. list)
 4. Illinois
 5. **Florida** (#1 on R.E. list)
- By industry, 67.2% of the new Fortune 500 companies in Manufacturing were founded by immigrants or their children, followed by 63.6% of companies in Professional and Other Services and 56.4% of new companies in the Information industry.

Global Citizen entrepreneurs have unique planning needs and represent a significant opportunity for planning professionals to expand and diversify their practice. **Growing your network of centers of influence and referral partners to reach these clients is an important next step.**

WE CAN HELP

The globalization of clients and wealth continues to increase the prevalence of Global Citizens in the United States and around the globe. The combination of multiple jurisdictions in personal and wealth profiles as well as the propensity of Global Citizens to take risks like moving to a new country, investing in foreign assets and starting new businesses adds complexity to the planning and requires specialized expertise.

Cross-border and international life insurance planning is complicated and complicated problems require expert solutions. To learn how we can help, contact us at peter@pagconsultingllc.com or visit us at www.pagconsultingllc.com.