The Exempt Transfer



Helping You Make An Informed Decision Tax Savings For Corporate Owners

Prepared for:

Male age 60, non-smoker

Date February 18, 2021

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Objectives & Comparisons



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The objectives are:

- o Preserve capital assets by providing liquidity for capital gains tax & recapture.
- o Provide a platform for tax-exempt growth & reduce taxable income.
- o Reduce the impact on the small business deduction on passive income in excess of \$50,000.
- o Convert retained earnings into capital dividends at life expectancy.
- o Bolster Investco's balance sheet.
- o Provide unencumbered tax-free liquidity for business continuity planning.

We will analyze & compare:

- o No life insurance vs. three different life insurance plans.
- o Isolate \$1.0 million of the fixed income portfolio for comparative.
- o Assets a moment prior to death.
- o Assets at death life expectancy.
- o Post-mortem planning implications.

Assumed Fact Pattern and Assumptions



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The assumed fact pattern:

- o Mr A. is 60, non-smoker; married; Canadian resident and taxpayer.
- o Mr A. owns 100% of the common shares of Investco.
- o Shares of Investco have nominal PUC and ACB.
- o Isolate a portion of Investco's fixed income portfolio
 - Fixed income: \$2,000,000
- o Annual dividends are paid to recoup Non-Eligible Dividend Tax on Hand (NERDTOH).*
- o Non-eligible dividends are reinvested by the shareholders.
- o Mr A.'s spouse dies first and all assets are transferred per ss 70(6).
- o Death of the last life insured occurs at age 82.
- o No Freeze was previously undertaken.

The assumptions applied are:

- o Three different insurance plans:
 - Term-to-100.
 - Universal Life Face plus Fund with level cost of insurance.
 - Participating Whole Life (Par).
- o Returns:

Fixed income: 5.00%Universal Life plan: 5.00%Reinvested dividends: 5.00%

Current Par dividend interest rate: 6.15%Illustrated Par dividend interest rate: 5.15%

- o Tax paid annually on reinvested Shareholder dividends.*
- o Top marginal tax rates are applied.

Investco Assets & Reinvested Shareholder Dividends Prior To Death



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Investco Assets Prior to Death - Age 82	No Life Insurance	Term-to-100 Life Insurance	Universal Life - Level Cost	Whole Life
Fixed income portfolio Life insurance cash surrender value NERDTOH refund*	\$ 2,076,719	\$ 1,509,179 - 23,139	\$ 1,040,512 959,835 15,947	\$ 1,040,513 1,486,024 15,947
Total Investco Assets	\$ 2,108,547	\$ 1,532,318	\$ 2,016,294	\$ 2,542,483
Reinvested Shareholder Dividends Prior to Death After-tax reinvested shareholder dividends*	\$ 1,172,071	\$ 1,023,593	\$ 702,856	\$ 702,856
Total Assets Prior to Death	\$ 3,280,617	\$ 2,555,911	\$ 2,719,150	\$ 3,245,339
Total Assets Relative to No Life Insurance	100%	77.9%	82.9%	98.9%

^{*}Annual dividends were paid to the shareholder to recoup Non-Eligible Dividend Tax on Hand (NERDTOH) and reinvested.

Investco Assets & Reinvested Shareholder Dividends at Death



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Investor Assets at Dooth Age 92	No Life	Term-to-100	Universal Life - Level Cost	Participating Whole Life
Investco Assets at Death - Age 82	Insurance	Life Insurance	Level Cost	whole Life
Fixed income portfolio	\$ 2,076,719	\$ 1,509,179	\$ 1,040,512	\$ 1,040,513
Life insurance death benefit	-	1,075,552	2,659,835	1,826,453
NERDTOH refund	31,828	23,139	15,947	15,947
Total Investco Assets	\$ 2,108,547	\$ 2,607,870	\$ 3,716,294	\$ 2,882,912
<u>Less Taxes Paid</u>				
Corporate non-refundable tax	\$ -	\$ -	\$ -	\$ -
Taxes on Terminal return	-	-	-	-
Taxes in Estate on wind-up	999,193	823,785	716,883	859,131
Net Investco Assets Received by Estate	\$ 1,109,354	\$ 1,784,085	\$ 2,999,411	\$ 2,023,781
Reinvested Shareholder Dividends at Death				
After-tax reinvested shareholder dividends	\$ 1,172,071	\$ 1,023,593	\$ 702,856	\$ 702,856
Total Assets & Reinvested Shareholder Dividends	\$ 2,281,424	\$ 2,807,679	\$ 3,702,267	\$ 2,726,637
Taxes as a % of corporate assets	47.39%	31.59%	19.29%	29.80%
Total Assets Relative to No Life Insurance	100%	123.1%	162.3%	119.5%

Total After-tax Assets & Taxes Paid in Millions - Graph



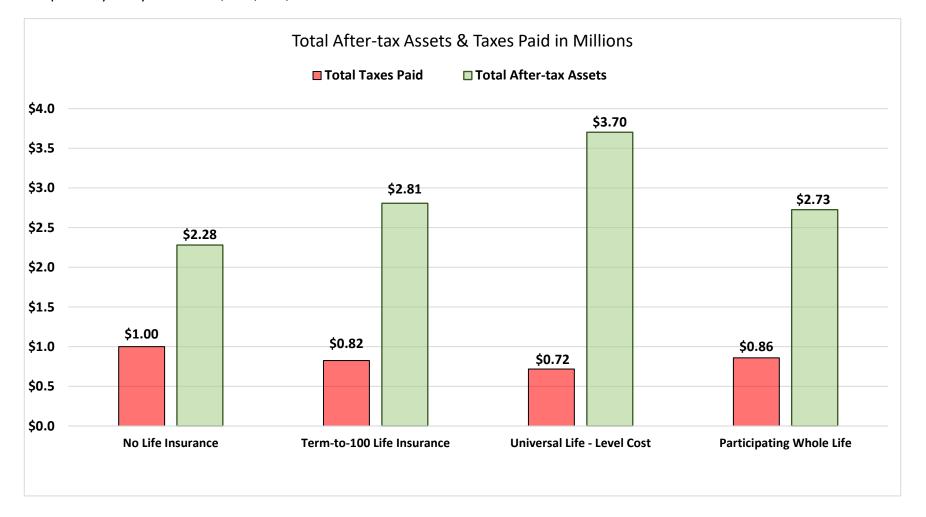
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Corporate Owned Universal Life - Diagram



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