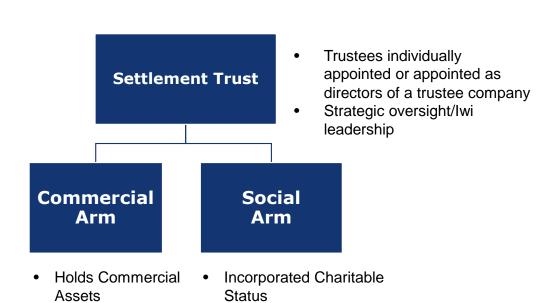
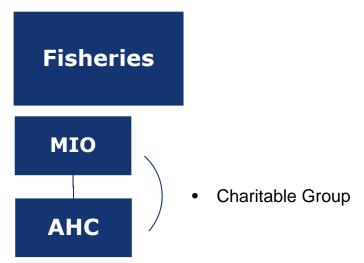
Settlement Trusts

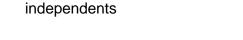
Helen Nathan | Morrison Kent Rotorua



Most common structures







Protection for trustees

Can involve

Limited liability for

DirectorsIndependents



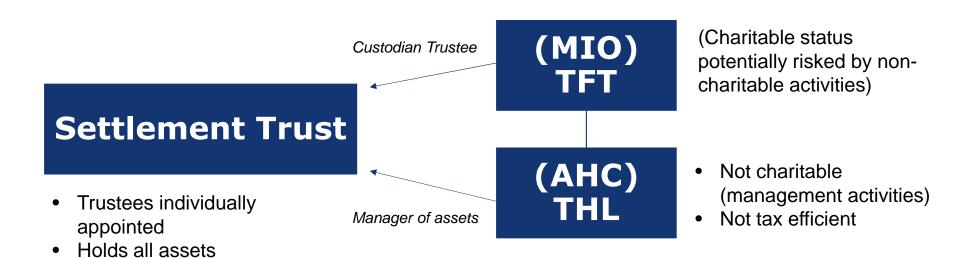
Common three tier structure

Entity	Governors protected from commercial risk	Tax efficient.	Charitable status safe.
Parent trust			NA
Commercial arm			NA
Charitable arm			

In all three arms Trustees / governors are protected from personal liability for commercial activities and Tax is minimised as appropriate.

Tapuika Structure

Trustees not protected



Tapuika Structure

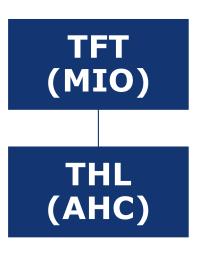
Entity	Governors protected from commercial risk	Tax efficient.	Charitable status safe.
Parent trust	×		NA
Commercial arm			
Charitable arm		×	×

Governors are not all being provided with protection from personal liability and taxation of charitable assets has been compromised.

Proposed Structure change for TIA

TIA

- Trustees appointed as directors of company (the Guardian Trustee). Directors protected by the limited liability of that company
- Holds own assets in name of Guardian Trustee
- Can use THL board personnel as a committee for asset management and not THL itself



- Charitable Group
- Trustees protected
- Charitable state enabled
- Tax efficient
- Note THL is not a necessary part of the Structure legally



Outcome

Entity	Governors protected from commercial risk	Tax efficient.	Charitable status safe.
Parent trust			NA
Commercial arm			
Charitable arm			

Helen Nathan

