



# BEYOND WEALTH

Advanced Tax Strategies for  
Ultra-High-Net-Worth Families

2026



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# INTRODUCTION



Ultra-high-net-worth families face opportunities and responsibilities that go far beyond traditional financial planning.

Wealth becomes more than assets — it becomes a legacy, a structure that supports family values, philanthropy, business succession, and future generations.

## Thoughtful planning helps families:

- Preserve what they've built
- Transfer wealth intentionally
- Stay flexible through economic and legislative changes
- Strengthen family unity
- Prepare heirs for responsible stewardship

At [Wohlstand Wealth Strategies](#), our goal isn't complexity — it's clarity, control, and confidence across generations.



# THE UHNW LANDSCAPE — PLANNING ACROSS GENERATIONS



UHNW families often operate like multi-branch enterprises. Decisions aren't made in isolation — they affect children, grandchildren, family foundations, and long-term business continuity.

## What Makes UHNW Planning Unique:

### Multiple Entities

Operating companies, real estate portfolios, partnerships, trusts, and family offices.

### Multiple Generations

Competing needs between wealth creators, active heirs, and non-active family members.

### Cross-Border Goals

Property and citizenships in multiple jurisdictions.

### Values-Based Planning

Incorporating philanthropy and purpose beyond assets.

## What Sophisticated Families Prioritize:

### Clarity

Understanding what they own, how it's structured, and where bottlenecks may arise.

### Continuity

Smooth transitions across generations or business leadership.

### Control

Ensuring wealth flows where intended without unintended consequences.

### Communication

Reducing conflict and misalignment among family members.

## Case Study: “The Family Enterprise Map”

A family with three adult children creates a unified structure aligning:

- A commercial real-estate portfolio
- A family foundation
- A multi-entity business

By organizing everything into a coordinated long-term plan, they clarify successor roles, formalize governance, and ensure each asset serves a specific generational purpose.

This reduces future conflict and preserves family unity.



# STRATEGIC GIFTING WITHOUT THE HEADACHE (2026 EDITION)



Gift-giving is no longer just about tax efficiency — it's a tool to shape how wealth moves through a family over time.

## Core 2026 Numbers:

Annual Gift Tax  
Exclusion

**\$19,000**

per recipient

Lifetime Gift &  
Estate Exemption

**\$15M**

per individual

Married Couple  
Combined Exemption

**\$30M**

*Source: Morgan Lewis 2026 IRS Exemption Update; IRS Publication 559.*

## How UHNW Gifting Creates Leverage:

### Removes Future Growth From the Estate

Transferring an asset today transfers its entire future appreciation.

### Encourages Multigenerational Stewardship

Gift-giving through trust structures gives heirs responsibilities, not just money.

### Supports Family Governance

Parents can guide access, timing, & purpose through trust language and distribution rules.

## Advanced Gifting Tools:

- Spousal gift-splitting
- Valuation discounts for minority interests
- Funding trusts with income-producing assets
- Direct tuition/medical payments (unlimited exclusion)

# TRUST STRUCTURES & LEGACY ARCHITECTURE



Trusts aren't simply for tax optimization — they're the backbone of multigenerational planning. At [Wohlstand Wealth Strategies](#), we help our clients navigate these strategies.

## Why UHNW Families Rely on Trusts

- ✔ Protect beneficiaries from creditors, divorces, or personal risk
- ✔ Retain long-term control with flexible modern provisions
- ✔ Define how wealth should be used and by whom
- ✔ Ensure stewardship, not entitlement



## Core Trust Types:

### Grantor Trusts

Great for shifting appreciation while the wealth creator pays the tax, accelerating trust growth.

### Non-Grantor Trusts

Useful for income-shifting strategies and selecting high-benefit jurisdictions.

### Dynasty Trusts

Allow wealth to compound for generations, preserving family values and purpose.

### Charitable Trusts (CRTs/CLTs)

Blend philanthropy with income planning and legacy impact.

## Case Study: “The 100-Year Family Plan”

A Nevada Dynasty Trust is funded with \$12M.

The trust invests in a diversified allocation including real estate and private equity.

Over decades, the trust becomes the family's core endowment, supporting:

- ➔ Education for future generations
- ➔ Family philanthropic projects
- ➔ Capital for new ventures

Family unity strengthens because the trust provides shared purpose across generations.

# LIQUIDITY PLANNING FOR MAJOR TRANSITIONS



One of the biggest UHNW challenges isn't tax — it's **liquidity**.

Wealth is often concentrated in businesses, real estate, or long-term investments. Transitions require access to cash.

## Events That Demand Liquidity:

- Business succession or partial exit
- Funding a large trust strategy
- Equalizing inheritances among multiple heirs
- Buying out branches of the family
- Real-estate consolidation or repositioning
- Philanthropic initiatives
- Long-term care and aging-parent needs

## Tools UHNW Families Use to Create Liquidity:

- **Permanent Life Insurance (ILIT structures):** A predictable, tax-efficient tool for future obligations.
- **Credit Lines Against Investment Portfolios:** Liquidity without forced sales.
- **Smoothing Business Sales Across Multiple Phases:** Reduces concentration risk.
- **Family Partnerships & Holding Companies:** Create organized capital pools and offer access to cash for heirs.

## Case Study: “Avoiding Forced Sales”

A family owns a \$40M operating company and \$18M of illiquid real estate.

Instead of risking a distressed sale during a leadership transition, they use:

- ➔ A life-insurance-funded ILIT
- ➔ A holding-company credit facility

This provides a stable liquidity pool that supports the business and the family's long-term goals without jeopardizing asset integrity.

Schedule a call with us today to discuss how we can assist.

### Key Sources:

1. [Internal Revenue Service](#) — “IRS releases tax inflation adjustments for tax year 2026 including amendments...” (Oct 9 2025)
2. [Morgan Lewis & Bockius LLP](#) — “IRS Announces Increased Gift and Estate Tax Exemption Amounts for 2026” (Oct 28 2025)
3. [Kiplinger](#) — “What is the Gift Tax Exclusion for 2025 and 2026?” (recent)
4. [Montgomery Purdue P.C.](#) — Blog post “2026 Update on Federal Transfer Tax Exemption and Annual Exclusion for Gifts”
5. [IRS](#) — “What's new — Estate and Gift Tax”

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