

PLANNING & STRATEGIC ADVISORY

2025 YEAR-END PLANNING LETTER

Authored by the Strategic Advisory Team



As 2025 comes to a close, we find ourselves reflecting on a year defined by both progress and recalibration. Many of the confident forecasts that began the year, which appeared justified by strong market performance for much of 2025, have been tested by a series of developments - including renewed trade frictions, evolving tariff and tax policies, shifts in global alliances, and mixed economic data - requiring an adaptive mindset. In the United States and globally, we have seen governments and businesses struggle to adjust to geopolitical realignments and an accelerating race to dominate in AI and related technology fields - which has generated both optimism and anxiety among investors. Uncertainty remains a persistent theme as global markets continue to interpret the impact of these changes and trends.

Families and business owners alike are considering new ways to assess risk and opportunity in the context of their individual visions for success. In the United States, perspectives on the 2025 tax legislation will strongly influence future entrepreneurial activity, capital investment, philanthropy, and intergenerational planning. Across other global financial centers, the increasing pace of change and the lack of predictability underscores the need for thoughtful, stable planning. In a world that feels increasingly fluid - economically, politically, and geographically - we see clients reexamining not just where they invest their money, but where they invest their time.

A More Mobile World

Global mobility has become an enduring feature of modern family and business planning. In 2025, a growing number of clients have considered cross-border moves - of people, assets, or both - as they evaluate opportunities for diversification, access, and stability. This shift has been amplified by political and fiscal uncertainty in the U.S. and abroad, leading many to ask what it would mean to change residency, investment platforms, or even citizenship.

While global mobility offers new possibilities, it also introduces complexity. Each relocation, whether of an individual or an asset, carries with it layers of compliance, tax, and legal implications. Dual citizenships, golden visas, and global residency programs may provide flexibility and access, but they require careful vetting. For U.S. citizens, in particular, expatriation and foreign investments bring additional reporting and exit tax considerations. We continue to emphasize that such decisions should begin with clarity of purpose and a full understanding of the consequences - financial, personal, and generational.

Ultimately, global opportunity is grounded in strategy. Families can thrive across borders when their financial structures, values, and governance models are as intentional as their mobility.

The “One Big Beautiful Bill” Act: A New Framework for Planning

The most consequential legislative change of 2025 was the passage of the One Big Beautiful Bill (OB BB) Act, signed into law midyear. Its reach across income, estate, and business taxation introduces a new era of relative stability - what we call the permanence paradigm.

1. Permanence and the End of the Sunset Mindset

For the first time in decades, many key tax provisions have been made permanent. The elimination of sunset provisions removes an artificial deadline that often drove hurried decision-making. Families now have the time and confidence to pursue steady, long-term planning rather than time-constrained, tax-driven transactions.

This stability provides a foundation for enduring progress - allowing families to establish predictable income tax and wealth transfer strategies that align with their broader objectives and values.

2. Income Tax Opportunities — Including Charitable Timing

With rates and exemptions at favorable levels and no immediate risk of change, 2026 offers a window for measured, strategic income tax planning. Clients may consider aligning tax liabilities and deductions more deliberately – through the timing of income recognition, portfolio rebalancing, or charitable giving – and can be purposeful in the selection of assets, such as appreciated securities and business interests, that can both satisfy philanthropic goals while supporting broader portfolio management objectives.

For those who itemize, synchronizing charitable intentions with thoughtful tax efficiency remains paramount because of certain thresholds and limitations that impact the deductibility of charitable gifts. Some donors will find it advantageous to group several years' worth of charitable gifts into a single tax year, often with the aid of donor advised funds or private foundations. In particular, because the OBBB Act creates new limitations on the deductibility of charitable gifts beginning next year, *accelerating 2026 gifts into 2025 may create tax advantages for high income donors.*

3. Business and entrepreneurial opportunities have been enhanced

In line with a focus on driving growth and innovation, the OBBB Act offers several benefits to businesses and entrepreneurs. Significantly, this includes an extension of the scope and appeal of Qualified Small Business Stock (QSBS), by increasing the extent of the exemption from capital gain, expanding the size of qualifying “small” businesses, and shortening the qualification period. In addition, the law reinstates 100% bonus depreciation, boosts the limit on deduction for qualifying assets to \$2.5 million, and preserves the 20% Qualified Business Income (QBI) deduction for pass-through entities.

4. Translating Higher Estate Exemptions into Purposeful Planning

The OBBB Act confirms a \$15 million individual (\$30 million per couple) gift and estate tax exemption, indexed for inflation – levels that are expected to remain stable for the foreseeable future. Consequently, many families who once faced urgency to make large gifts before the anticipated year-end “sunset” may now take a more deliberate approach.

For those whose estates fall below the exemption threshold, maintaining assets until death can preserve the benefit of a step-up in basis and reduce overall tax exposure for the family. For families whose estates will remain taxable regardless of the increased exemptions, traditional strategies – such as dynasty trusts, grantor retained annuity trusts (GRATs), or intra-family loans – continue to serve an important role. Such families should continue regular, systematic gifting, while seizing opportunities to make larger wealth transfers as circumstances warrant to benefit multigenerational or philanthropic aspirations. In every case, aligning technical planning with personal purpose remains essential.

Beyond tax and estate mechanics, this is also a moment to revisit family governance. With the wealth transfer landscape less constrained by deadlines, many clients are redirecting their focus toward education, succession, and next-generation engagement. Reaffirming shared values and a family mission can help ensure that financial capital continues to serve human and philanthropic purposes over time.

Planning with Clarity and Calm

As we look toward 2026 and beyond, the environment remains complex but navigable. Artificial intelligence continues to reshape how organizations operate, how value is created, and what productivity means. Global mobility expands opportunity but demands careful coordination. Tax policy has reached an unusual moment of durability, offering a framework for thoughtful, sustained progress.

Amid these shifts, our message remains consistent: successful long-term planning depends on preparation, flexibility, and focus. We encourage clients to focus on their family missions, charitable priorities, and governance frameworks before the year is out – ensuring each reflects not just today's financial environment but the enduring purpose that defines their wealth.

Our Strategic Advisory team remains committed to helping clients translate complexity into clarity and possibility. We look forward to the year ahead – to the conversations, plans, and shared progress that continue to define our work together. [B](#)



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