

## Dina Kapur Sanna **Partner**

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## Overview

Dina Kapur Sanna has close to 30 years of experience in advising U.S. and non-U.S. taxpayers on wealth management structures which accommodate multi-jurisdictional tax and legal considerations. Her practice involves foreign trusts, pre-immigration and expatriation planning, planning for the purchase of U.S. property by non-U.S. persons and compliance with tax and reporting obligations for those with overseas interests in foreign accounts, corporations and trusts.

Dina is recognized as a practitioner in international estate planning by Chambers HNW\* (Chambers & Partners), Chambers Global\*, Private Client Global Elite (ALM Media Properties, LLC), and The International Who's Who of Private Client Lawyers. In the 2023 edition of Chambers HNW\* (Chambers & Partners), it notes that she is "technically very strong. She really knows her international stuff." Chambers HNW quoted another source who noted her strength in cross-border work. Dina is a frequent speaker at estate planning seminars around the world. She has written numerous articles that appear in legal periodicals in the U.S. and abroad.

Dina is a fellow of the American College of Trust and Estate Counsel (ACTEC) and a member of its International Estate Planning Committee. In addition, she is an Academician of The International Academy of Estate and Trust Law. She also was a former member of the Firm's Executive Board.

\* No aspect of these advertisements has been approved by the highest court of any state. See Awards Methodology.

### **Education and Credentials**

#### **Education**

New York University School of Law, LL.M., in Taxation

The George Washington University Law School, J.D., with Honors, Order of the Coif

Lehigh University, B.A., magna cum laude, Omicron Delta Epsilon, the International Economic Honorary Society

#### **Admissions**

State of New York

# DAY PITNEY LLP

#### Practices & Industries

**Family Office** 

**International Trust & Estates** 

LATAM

**Private Client** 

**Trust & Estates** 

**Trust Services and Fiduciary Compliance** 

#### **Affiliations**

American Bar Association, Section of Real Property, Trust and Estate Law, Income and Transfer Tax Planning Group, International Tax Planning Committee

American College of Trust and Estate Counsel (ACTEC), Fellow; International Estate Planning Committee

International Academy of Estate and Trust Law, Academician

New York State Bar Association, Trusts & Estates Law Section, International Estate Planning Committee

Society of Trust and Estate Practitioners (STEP)

## **Recognition and Community**

No aspect of this advertisement has been approved by the highest court of any state. Prior results do not guarantee a similar outcome. See Awards Methodology.

#### Recognitions

Named to Law.com's 2025 Private Client Global Elite Directory, in the Excellence category, 2025

Chosen for inclusion in Chambers HNW Guide (Chambers & Partners) of recognized practitioners for Private Wealth Nationwide, 2017-2024; USA Eastern Region, 2016, 2020-2023; New York, 2016-2024

Named a Who's Who Legal as a WWL: Thought Leaders Global Elite 2024 and for Thought Leaders USA, 2024

Selected to the list of Private Client Global Elite by Legal Week (ALM Media Properties, LLC), 2017-2024

Chosen for inclusion in Who's Who Legal (Law Business Research Ltd), Private Clients, 2018

Chosen for inclusion in The Best Lawyers in America (Woodward/White, Inc.), Trusts and Estates, 2007-2025

Chosen for inclusion in the Chambers Global (Chambers & Partners) for Global-wide International Private Client, 2015-2016, 2020

Chosen for inclusion in the Chambers USA Legal Directory (Chambers & Partners) of recognized practitioners for wealth management in Connecticut, 2011-2016

Chosen for inclusion in The International Who's Who of Private Client Lawyers (Law Business Research Ltd), 2013-2015

Selected to the list of New York Super Lawyers (Thomson Reuters), Estate Planning & Probate 2009-2012

## **Insights**

U.S. Tax Planning for Non-U.S. Persons, Assets and Trusts - An Introductory Outline September 18, 2024

Are You Required to Participate in Bureau of Economic Analysis' Benchmark Survey? May 1, 2023

Pre-Residency Planning for Your Client's Trust October 22, 2021



IRS Provides Limited Relief to Cross-Border Taxpayers Stranded by COVID-19 April 28, 2020

IRS Significantly Extends Filing, Payment and Other Deadlines Due to COVID-19 April 10, 2020

COVID-19 Response: NY Executive Order Permits Video Execution of Wills and Other Documents April 8, 2020

Summary of Certain Tax Relief Available in COVID-19 CARES Act March 31, 2020

Traps for the Unwary: COVID-19 Tax Relief Fails to Extend Certain Foreign Information Return Filing Deadlines March 30, 2020

Attribution After the TCJA: A Downward Spiral of Unintended Consequences October 24, 2019

IRS Revises EIN Application Process, Increasing Burden on Non-U.S. Taxpayers March 29, 2019

Structuring Foreign Investments in U.S. Real Estate After the Tax Cuts and Jobs Act summer 2018

Controlled Foreign Corp. Restructuring for US Taxpayers August 13, 2018

Tax Reform and International Private Clients January 10, 2018

The New Form 5472 Reporting Requirements: Are your clients ready? October 18, 2017

Long Arm of the Law: The Risk to U.S. Practitioners of Prosecution for Facilitating Foreign Tax Offenses June 1, 2017

Reporting Requirements for Foreign Trusts February 1, 2017

New Filing Requirements for Foreign-Owned Disregarded Entities January 3, 2017

IRS Issues Final Regs for Reporting of Foreign Financial Assets March 4, 2016

IRS Issues Proposed Regs Taxing Gifts and Bequests From Covered Expatriates September 22, 2015

### News

Dina Kapur Sanna Honored in Law.com's 2025 Private Client Global Elite Directory January 28, 2025

Dina Kapur Sanna Named a Who's Who Legal: Thought Leaders Global Elite 2024 and Thought Leaders USA 2024 for **Private Client** 

September 10, 2024

Chambers High Net Worth Recognizes 18 Day Pitney Attorneys for Private Wealth Law July 18, 2024



Day Pitney Secures Solutions for International Americans Award at the Family Wealth Report Awards 2024 May 6, 2024

Dina Kapur Sanna Named a Who's Who Legal: Thought Leaders Global Elite 2023 December 6, 2023

Chambers High Net Worth Recognizes 20 Day Pitney Attorneys for Private Wealth Law July 20, 2023

Chambers High Net Worth Recognizes 20 Day Pitney Attorneys for Private Wealth Law July 22, 2022

Chambers High Net Worth Recognizes 20 Attorneys for Private Wealth Law July 26, 2021

Chambers High Net Worth Recognizes Day Pitney and 16 Attorneys for Private Wealth Law July 10, 2020

Chambers Global 2020 Ranks Day Pitney's Energy Practice, Energy Attorneys, and Individual Client Attorneys February 18, 2020

Day Pitney Attorneys Named to Legal Week's Private Client Global Elite for 2019 September 9, 2019

Chambers High Net Worth Recognizes Day Pitney and 16 Attorneys for Private Wealth Law July 18, 2019

Chambers High Net Worth Guide 2018 Recognizes Fifteen Day Pitney Attorneys July 24, 2018

Four Day Pitney Partners Named to Legal Week's Private Client Global Elite List for 2018 July 19, 2018

Profiles in Diversity Journal Names Four Day Pitney Attorneys "Women Worth Watching" For 2018 June 13, 2018

Dina Kapur Sanna Elected Member of The International Academy of Estate and Trust Law February 26, 2018

Chambers High Net Worth Guide 2017 Recognizes Eleven Day Pitney Attorneys September 20, 2017

71 Day Pitney Lawyers Named to 2017 Best Lawyers List August 15, 2016

Chambers High Net Worth Guide 2016 Recognizes Nine Day Pitney Attorneys June 28, 2016

Chambers USA 2016 Ranks 47 Day Pitney Attorneys May 27, 2016

Chambers Global 2016 Recognizes Six International Private Client and Energy Partners March 23, 2016

Day Pitney Reelects Executive Committee and Elects New Executive Board March 18, 2016

68 Day Pitney Lawyers Named to 2016 Best Lawyers List August 24, 2015

Chambers USA 2015 Ranks 51 Day Pitney Attorneys May 21, 2015



Seventy Day Pitney Lawyers Named to 2015 Best Lawyers List August 22, 2014

Chambers USA 2014 Ranks 46 Day Pitney Attorneys May 23, 2014

Seventy Day Pitney Lawyers Named to 2014 Best Lawyers List August 15, 2013

Chambers USA 2013 Ranks 39 Day Pitney Attorneys May 24, 2013

Ninety-eight Day Pitney Attorneys Recognized by Super Lawyers October 22, 2012

Seventy-Five Day Pitney Lawyers Named to Best Lawyers List for 2013 August 23, 2012

Chambers USA 2012 Ranks 41 Day Pitney Attorneys June 8, 2012

Seventy-two Day Pitney Lawyers Named to Best Lawyers List for 2012 October 4, 2011

Chambers USA 2011 Ranks 45 Day Pitney Attorneys June 10, 2011

Seventy-six Day Pitney Lawyers Named to Best Lawyers for 2011 August 9, 2010

### In The Media

International Private Client Department Cochairing and Speaking at 20th Annual International Estate Planning Institute March 21, 2025

Dina Kapur Sanna Serving as Panelist at IBA Private Client Tax Conference March 4, 2025

What are the implications of the UK non-dom regime changes for US persons? Transatlantic Wealth & Estate Planning: New York 2024, November 20, 2024

"Tax and Non-Tax Considerations when Domesticating an Offshore Trust", STEP Wyoming September 21, 2024

Successfully Serving Families of Wealth for Generations Acclaim Magazine, May 2024

"Estate planning and administration for the Cross-Border client with ties to the United States and Israel", STEP NY June 25, 2024

"Musical Chairs & the Family Cottage: What Happens When the Music Stops & There's Not Enough Room at the Inn?", The American College of Trust and Estate Counsel (ACTEC) June 24, 2024

New York Partner, Dina Kapur Sanna Co-Chair of International Trusts & Estates Webinar Using Trusts and Alternative Vehicles for Inbound Investments April 4, 2024



Using Foreign Partnerships to Hold U.S. Situs Assets, Interplay with 663(b) and FAI Planning 19th Annual International Estate Planning Institute, March 14, 2024

"The Nitty-Gritty of Foreign Trust Taxation - Diving Into the Complex U.S. Tax Rules Associated With Foreign Trusts", Heckerling Institute on Estate Planning

January 11, 2024

"Transatlantic Wealth & Estate Planning Conference," Informa Connect September 13, 2023

"18th Annual International Estate Planning Institute," New York State Bar Association and STEP NY March 30, 2023

"Managing a Global Family: Cross Border Considerations and Other Key Trends," Family Office Leadership Program, Citi Private Bank

June 7, 2022

"17th International Estate Planning Institute," International Section, Trusts & Estates Law Section, New York State Bar Association and STEP-NY

April 1, 2022

"Tricks and Tips on Navigating the Choppy Waters of International Estate/Succession Administration" The American College of Trust and Estate Counsel

March 12, 2022

"From Take Off to Touch Down – A Comprehensive Look at Inbound Investments into U.S. Markets," Heckerling Institute on **Estate Planning** 

January 12, 2023

"Planning Tips and Pitfalls for International Estate Planners," Florida Fellow Institute, American College of Trust and Estate Counsel

September 23, 2021

Private Client TransTrusts Bermuda: Impact of Regulation, Economic Substance, Beneficial Owner Registrations, FATCA, **CRS Across Jurisdictions** 

June 4, 2021

"Little-Known Wrinkles in Foreign Trusts – Skills to Avoid Pitfalls in Practice," 16th Annual International Estate Planning Institute: Part 2

March 18, 2021

Dina Kapur Sanna Co-Chairs 16th Annual International Estate Planning Institute: Part 2

March 18, 2021

Sanna and Whitaker Named to Legal Week's Private Client Global Elite for 2021

Legal Week, February 5, 2021

Inbound Planning: Trust and Estate Planning 2020

December 10, 2020

Planning Tips and Pitfalls for International Estate Planners

December 8, 2020

U.S. Federal Estate, Gifts and GST Taxation of Nonresident Aliens

The Chamber's International Tax Journal, December 3, 2020

Where Should I Locate My Structures?

September 3, 2020



Nonresident Investment in U.S. Real Estate: Tax Traps to Avoid

March 20, 2020

International Trust and Estate Planning 2019

November 14, 2019

Cambridge International Wealth Advisors Forum 2.0

May 17, 2019

International Estate & Tax Planning 2019

May 6, 2019

Nuts and Bolts of Domesticating Foreign Trust Structures

March 14, 2019

15th Annual International Estate Planning Institute

March 14-15, 2019

Lose the Fear of the Foreign – Practical Planning Strategies

January 16, 2019

International Trust and Estate Planning 2018

November 2, 2018

8th Annual BTG Pactual Wealth Management Future Leaders Program

October 11, 2018

Suitable Investment Structures for International Clients

October 17, 2018

New Ethical Standards in Tax Planning: What is Acceptable Going Forward?

September 6, 2018

Structuring Foreign Investments in U.S. Real Estate After the Tax Cuts and Jobs Act

June 4, 2018

14th Annual International Estate Planning Institute

March 22-23, 2018

Foreign Trusts Redux: Latent Opportunities and Patent Pitfalls

14th Annual International Estate Planning Institute, March 22, 2018

2017 Delaware Trust Conference

October 24, 2017

Recent Developments in International Estate Planning: The U.S. Begins to Embrace Transparency

October 18, 2017

"International Recent Developments," Heckerling Institute on Estate Planning

September 21, 2017

Dina Kapur Sanna and Carl A. Merino Speak at International Wealth Advisors Forum

June 15, 2017

Living in a Glass World: A Global Transparency Outline for Wealth Advisors

May 25, 2017

Complex Issues in Foreign Trusts

13th Annual International Estate Planning Institute, March 23, 2017

13th Annual International Estate Planning Institute

March 23, 2017



### American Law Institute CLE International Trusts and Estate Planning 2016

October 27, 2016

#### Conn. Law Firms Appoint Leaders, Announce New Hirings

The Connecticut Law Tribune, April 14, 2016

#### Inbound Planning with Foreign Trusts (Including Planning for Underlying Foreign Companies)

ALI-CLE International Trust and Estate Planning, San Francisco, California, October 20, 2014

#### Tax Residency - Who is a Tax Resident in Your Jurisdiction

International Wealth Advisors Future Leaders Forum, June 3, 2015

#### Current Tax Topics: Foreign Trusts: Dealing with UNI, Grantor v Non-Grantor GST

New York State Bar Association's 9th Annual International Estate Planning Institute, March 15, 2013

#### Foreign Account Tax Compliance Act (FACTA), Primer for U.S. Individual Taxpayers with Foreign Assets and Foreign **Financial Institutions**

West LegalEdcenter, June 12, 2012

#### Cross-Border Investment in Financial Assets: Structuring and Compliance Considerations

American Bar Association's Estate Planning and Real Property Spring Symposia CLE Meeting, April 30, 2015

#### Foreign Investment in U.S. Real Property

11th Annual International Estate Planning Institute, March 12, 2015

#### Foreign Trusts: How to Deal with UNI

11th Annual International Estate Planning Institute, March 12, 2015

#### The Future of Private Wealth Planning - More Than Just Compliance

International Bar Association, London, England, March 3, 2015

#### Moderator, "Transparency & Disclosure" and "Matrimonial & Succession Regimes: Advising the Multinational Couple on their Estate Plan," International Wealth Advisors: the Future Leaders Forum, Surrey, United Kingdom, June 4-6, 2014 June 4, 2014

## Warren Whitaker and Dina Kapur Sanna Co-author Chapter of ABA Guide to International Estate Planning

December 10, 2013

#### PFIC Considerations For Foreign Investors with U.S. Beneficiaries

STEP Boston, October 3, 2013

#### Changing Attitudes to Disclosure

International Wealth Advisors: The Future Leaders Forum, Frankfurt, Germany, June 5, 2013

#### Perceptions of Assertive Women

Tri-State Diversity Council Symposium, Women Leaders as Architects of Change, March 7, 2013

#### **Delaware Trust Conference**

Delaware Bankers Association, October 2, 2012

#### When a Marriage Goes Global

ABA Section of Real Property, Trust & Estate Law, May 4, 2012

#### Planning Considerations for the NRA and the US Expat

ABA Real Property Trust & Estate Law CLE Seminar, April 3, 2012

#### U.S. Tax Planning for Non-U.S. Persons with U.S. Income and Assets

September, 2011

#### United States/India Cross Border Planning

4th Annual STEP Pacific Rim Conference in Santa Monica, CA, May 12, 2011



#### Advanced Planning for United States Beneficiaries of Foreign Trusts

4th Annual STEP Pacific Rim Conference in Santa Monica, CA, May 12, 2011

#### Swiss Trustees and Protectors: Global Strategies from Offshore to Onshore

STEP Suisse Romande Annual Conference, May 10, 2010

#### Spotting Issues When People Move Across Borders

ABA Section of International Law 2010 Spring Meeting: Fundamentals of International Practice, April 13, 2010

#### Sixth Annual International Estate Planning Institute

New York State Bar Association, March 18, 2010

