



The Global Option

RESIDENCY & CITIZENSHIP
with David Jenkins

Four Realistic Residency Options

for American & Canadian Families

A plain-English comparison of Portugal, Italy, Greece and Panama.

Clear explanations. Trusted specialists. One point of contact.

More options. Fewer assumptions.

Another residency can give a family greater freedom over where they live, study, invest and spend their time. It can also involve a surprising number of rules written by people who appear to enjoy paperwork.

This guide gives you a straightforward first comparison of four established routes. It is designed to help you ask better questions - not to replace personal legal, tax, immigration or investment advice.

“The right option should fit around your life - not require you to redesign it around a visa.”

WHO THIS IS FOR

American and Canadian families exploring another residency, a future move, European access or a practical Plan B.

WHAT THIS IS NOT

A promise that one country suits everyone. Family, tax, investment and lifestyle circumstances all matter.

MEET DAVID

International experience. Plain-English guidance.

I was born in London, hold British, Irish and New Zealand passports, and divide my year between Mexico, where I am a resident, and Europe. For more than a decade, I have helped predominantly American and Canadian clients make significant property decisions overseas.

I make complicated options easier to understand, help clients identify what genuinely suits them and work alongside experienced legal, tax, immigration and investment specialists in each country to make it happen.



AT A GLANCE

Four routes. Four very different propositions.

These are starting figures, not complete quotations. Professional fees, government charges and family costs are additional.



Portugal

STARTING POINT

EUR 250,000 cultural contribution
EUR 500,000 qualifying fund

RELOCATION

Low minimum stay under ARI

FLEXIBLE EUROPEAN RESIDENCY



Italy

STARTING POINT

EUR 250,000 innovative startup
EUR 500,000 Italian company

RELOCATION

Best suited to real Italian residence

SEVERAL DIRECT INVESTMENT ROUTES



Greece

STARTING POINT

EUR 250,000 special-property routes
EUR 400,000 or EUR 800,000 standard property

RELOCATION

No full-time relocation to retain investor residence

PROPERTY-LED EUROPEAN RESIDENCY



Panama

STARTING POINT

From US\$300,000 through qualifying new real estate

RELOCATION

Permanent-residency proposition

A NORTH AMERICAN-FRIENDLY ALTERNATIVE

THE SIMPLE DISTINCTION

- Residency gives permission to live in a country under specified conditions.
- Permanent residency is a more durable status, but conditions still apply.
- Citizenship is separate and may require years of residence, physical presence, language ability and approval.
- Schengen travel means convenient short visits around the 29-country area. It does not grant the right to live or work in every member country.

The flexible European option.

Portugal remains attractive to families who want European residency without moving their entire lives immediately. Its investment-residence programme is formally called the ARI.

QUALIFYING STARTING POINTS

EUR 250,000 cultural contribution or EUR 500,000 through a qualifying Portuguese investment fund. Other research, company and job-creation routes also exist.

TIME IN PORTUGAL

The ARI minimum is generally seven days in the first year and fourteen days during each subsequent two-year period.

WHAT MAKES IT APPEALING

- Residence in Portugal with convenient travel across the Schengen Area.
- Qualifying family members can usually be included.
- A future route to permanent residence or citizenship may be available if the legal requirements in force at that time are met.
- The fund route allows the immigration investment to be handled through a regulated Portuguese structure.

WHAT NEEDS CAREFUL ATTENTION

- Portuguese real estate no longer qualifies as an ARI investment.
- Not every Portuguese fund accepts US investors.
- A fund can qualify for immigration purposes without being suitable from an investment or US tax perspective.
- Fees, liquidity, exit terms, risk and the identity of any buyback provider must all be understood before investing.

DAVID'S PLAIN-ENGLISH VIEW

Portugal is particularly strong for someone who wants a credible European foothold without immediately becoming a full-time European.

For people considering a genuine Italian chapter.

Italy offers an Investor Visa for non-EU nationals who make a qualifying investment or donation. It is not a real-estate Golden Visa; buying an Italian home by itself does not create eligibility.

MAIN ROUTES

EUR 250,000 in an Italian innovative startup; EUR 500,000 in an Italian limited company; EUR 2 million in government bonds; or a EUR 1 million philanthropic donation.

HOW IT BEGINS

The investor first applies for official clearance and the visa. The qualifying investment is then completed within the required period after entering Italy.

WHAT MAKES IT APPEALING

- Several investment routes rather than one prescribed product.
- A two-year initial residence permit that can be renewed when the conditions continue to be met.
- Family reunification may be available for qualifying family members.
- Particularly compelling for people who genuinely see Italy as somewhere to live, not simply somewhere to obtain a card.

WHAT NEEDS CAREFUL ATTENTION

- The investment generally needs to be maintained for the legally required period.
- Startup and company investments involve genuine commercial risk.
- Long-term residence and citizenship depend on actual residence and additional legal requirements.
- Tax residency must be planned separately from immigration residency.

DAVID'S PLAIN-ENGLISH VIEW

Italy sells itself rather well. The important part is making sure the practical route is as attractive as the idea of it.

A tangible, property-led route.

Greece is attractive to investors who prefer owning a physical property rather than subscribing to a fund. The threshold depends on the property, its location and the specific route used.

STANDARD PROPERTY ROUTES

EUR 800,000 in high-demand areas including Attica, Thessaloniki, Mykonos, Santorini and larger islands;
EUR 400,000 in many other areas.

SPECIAL EUR 250,000 ROUTES

Certain commercial-to-residential conversions and qualifying restoration of listed buildings may remain eligible. Detailed legal conditions apply.

WHAT MAKES IT APPEALING

- A renewable five-year residence permit linked to maintaining the qualifying investment.
- No full-time relocation requirement simply to retain the investor residence permit.
- Qualifying family members can generally be included.
- A property that can also serve a genuine lifestyle purpose, subject to programme rules.

WHAT NEEDS CAREFUL ATTENTION

- Thresholds vary substantially by location and property type.
- Standard EUR 400,000 and EUR 800,000 routes generally involve one property meeting the required minimum size.
- Golden Visa properties face restrictions on short-term rental use.
- Citizenship requires genuine residence and integration; property ownership alone does not create a shortcut.

DAVID'S PLAIN-ENGLISH VIEW

Greece can be wonderfully tangible: you can point at the investment. You simply need the right property, in the right place, under the right rule.

A practical option closer to home.

Panama offers a very different proposition from Europe: permanent residency in a US-dollar economy, strong international connectivity and considerably easier access from North America.

CURRENT STARTING POINT

The Qualified Investor route may begin from US\$300,000 through qualifying new real estate, subject to the property, structure and current programme rules.

RESIDENCE OUTCOME

The programme is designed as a permanent-residency route rather than a temporary European-style residence permit.

WHAT MAKES IT APPEALING

- Closer to the United States and Canada than the European options.
- A US-dollar economy and an established international business centre.
- A permanent-residency proposition through qualifying investment.
- Potentially attractive for families seeking a second base in the Americas.

WHAT NEEDS CAREFUL ATTENTION

- The exact property and payment structure must qualify under the current rules.
- Residency does not automatically make someone a Panamanian tax resident.
- A potential future naturalisation route is separate, discretionary and based on more than simply holding an investment.
- Property, legal and immigration due diligence should proceed together.

DAVID'S PLAIN-ENGLISH VIEW

Panama is the interesting alternative when Europe feels unnecessarily far away - geographically or otherwise.

The visa and the tax return need to get along.

US citizens and resident aliens generally continue reporting worldwide income to the IRS even while living abroad. A second residency changes where you may live; it does not quietly switch off the American tax system.

FOUR QUESTIONS TO ANSWER EARLY

1

US INVESTOR ACCESS

Will the chosen investment accept a US person? Some foreign funds do not.

2

PFIC TREATMENT

Could the investment be treated as a PFIC? Certain foreign funds may create Form 8621 reporting and potentially unfavourable tax treatment.

3

FOREIGN-ACCOUNT REPORTING

Will foreign accounts trigger reporting? FBAR and other foreign-asset reporting may apply.

4

WHERE YOU LIVE AND WORK

Physical presence can affect local tax and employment obligations.

THE ESSENTIAL PRINCIPLE

An investment can qualify perfectly for immigration and still be a poor fit for an American taxpayer. Immigration eligibility, investment suitability and tax suitability must be checked separately - preferably before the money starts travelling.

I coordinate the discussion with the relevant immigration, investment and cross-border tax specialists so the different pieces are considered together.

Another residency does not automatically end Canadian tax residency.

The Canada Revenue Agency looks at the facts: where you live and the residential ties you keep. Receiving a residence card somewhere sunny does not, by itself, settle the Canadian tax question.

FOUR QUESTIONS TO ANSWER EARLY

1

YOUR INTENTION

Are you relocating or creating an additional option? Those are very different plans.

2

CANADIAN TIES

Which Canadian ties will remain? A home, spouse, dependants and other connections can affect tax residency.

3

DEPARTURE TAX

Could departure tax apply? Canada may treat certain assets as sold at market value when someone emigrates for tax purposes.

4

INCOME AND INVESTMENTS

What happens to Canadian income and investments? Accounts, pensions, property and investment income require individual review.

THE ESSENTIAL PRINCIPLE

A Canadian family can acquire another residency without necessarily leaving Canada for tax purposes. If a genuine move is planned, a Canadian cross-border tax specialist should be involved early enough to plan it properly.

I coordinate the discussion with the relevant immigration, investment and cross-border tax specialists so the different pieces are considered together.

Nine questions worth answering properly.

- 1 What do you want the new residency to achieve?

- 2 Do you want to relocate, or keep your life where it is?

- 3 Which family members need to be included?

- 4 What is your realistic total budget, beyond the headline investment?

- 5 Do you prefer property, a fund, a company investment or a contribution?

- 6 How long are you comfortable holding the investment?

- 7 Where will you continue working and paying tax?

- 8 Is future citizenship important, or is residency enough?

- 9 What would make this feel like a successful decision five years from now?

HOW I HELP

We begin with a relaxed conversation about your family, timeline, budget and reasons for exploring another option. I then help you compare the routes that genuinely deserve attention and coordinate the process with the appropriate specialists in each country.



YOUR NEXT STEP

Start with a conversation.

You do not need to know which country you want. Tell me what you would like another residency to make possible for you and your family, and we will work out which options deserve a closer look.

SPEAK WITH DAVID

WhatsApp: +52 331 348 4773

Email: david@theglobaloption.com

www.theglobaloption.com

A simple “Hi David, where do I begin?” is absolutely fine.

IMPORTANT INFORMATION

This guide provides general information only and does not constitute legal, tax, immigration or investment advice. Programme rules, government fees, qualifying investments, processing practices and citizenship laws can change. Eligibility and suitability must be confirmed for each applicant before any commitment is made. Investment capital is at risk unless expressly protected by legally enforceable terms.

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