

As the world becomes increasingly interconnected, many families are exploring dual citizenship to harness a range of global opportunities and living arrangements. There are several pathways to obtaining citizenship, each offering varying degrees of flexibility and benefit. The concepts below are designed to help guide you through the advantages and considerations of dual citizenship.

## Advantages of Dual Citizenship

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Given the uncertainties of today's geopolitical and economic landscape, acquiring an alternative citizenship may be worth considering as both an insurance policy and as an investment for the future. U.S. citizens are allowed to hold one or more additional citizenships, without losing their U.S. citizenship, and dual citizenship can serve as a strategic tool, helping to navigate the complexities of the globalized world and mitigating the risks that may arise from relying solely on one passport.

**Visa-Free Unencumbered Travel.** A second passport allows individuals to be recognized as citizens of two countries. One of the most tangible advantages of dual citizenship lies in the ability to travel more easily between countries without the typical constraints faced by non-citizens. Depending on where you choose to travel, the visa process can be time consuming and change frequently.

With dual citizenship, travelers can avoid strenuous visa application processes and visa fees, as they often enjoy visa-free access to a broader range of countries. This streamlined travel experience allows individuals to travel without the complexity, cost and time required to get necessary documentation.

Even if you have a second home outside of the United States, there are limitations on how many days a year or how many days in a row you can stay there depending on your visa type. Having a second passport offers greater flexibility in how often and for how long you visit. This can be particularly beneficial when familial ties extend across borders.

**Lifestyle & Retirement Benefits.** One of the most significant advantages of dual citizenship lies in the flexibility to choose where to live and retire, as dual citizens can settle in either of their countries of citizenship. If the additional citizenship is from an European Union (EU) member country, you gain the right to live, work, or retire anywhere in the EU. Many EU countries also participate in the Schengen Area, a border-free travel zone comprising 29 countries, allowing free travel across most of Europe.

Moreover, dual citizenship in some cases may grant access to an extended range of social benefits and services in both countries. This includes healthcare, education, and various social welfare programs, allowing retirees to enjoy comprehensive support systems and a high quality of life.

The advantages of dual citizenship have the power to transcend generations. Depending on the specific citizenship requirements of your chosen country, you may have the opportunity to extend the benefits to your children and grandchildren.

## Multiple Routes to Dual Citizenship

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There are various avenues through which you can become a dual citizen. Each has their own advantages, and the suitability of these options will vary depending on the country or countries where you wish to acquire citizenship and your personal and financial goals.





**Citizenship by Lineage.** This is a commonly overlooked path to gaining citizenship in another country. Citizenship by lineage, also known as “citizenship by descent,” enables you to claim citizenship based on your familial ties and ancestry. The process typically involves proving a direct bloodline connection to a family member from the country of interest. The eligibility criteria and documentation requirements vary from country to country, with some more strict and others more flexible. If you are interested in pursuing this option to acquire second citizenship, look carefully into your family history and be careful to adhere to the specific regulations of the country in question.

While some countries restrict this option to just one generation, there are others that grant citizenship to individuals with family histories that span much further back. While this option may often entail an initial cost to gather the necessary documentation, typically with the help of a professional genealogist, the cost is likely to be significantly less than would be required for citizenship by investment. The process from start to finish can take from one to three years depending on the process and backlog for the specific country.

**Citizenship by Investment.** Some countries offer citizenship in exchange for a substantial financial investment in private companies, real estate or government funds. The requirements for citizenship by investment programs vary from country to country. The types of investments that qualify can include real estate purchases, investments in government funds, and investments in designated sectors of the economy.

A European Court of Justice ruling on April 29, 2025, was issued to Malta but the legal principles apply to all EU member states and may shape EU-wide policy going forward, so it is important to work with a professional to understand these new implications. Malta subsequently closed its citizenship-by-investment program and replaced it with a merit-based naturalization route.

**Golden Visa Programs.** If full citizenship is not your initial goal, but you would like residence in another country, there are residency-by-investment programs, also known as Golden Visas, that make this possible. Golden Visas provide a fast-track way to obtain temporary residency in your country of choice. The requirements for a Golden Visa vary from country to country and typically involve making some kind of investment within the country.

By fulfilling the necessary residency conditions, individuals may have the opportunity to transition to permanent residency or even citizenship in their desired destination. It is important to work with a professional as these programs change frequently and at times may be closed entirely.

## Important Considerations When Deciding to Pursue Dual Citizenship

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**Tax Implications.** Having dual citizenship or residency offers significant advantages. However, there are tax implications that should be carefully considered before going through the process. The tax consequences of residing in two countries can be complex and may vary depending on each country’s tax laws and regulations.

One of the key considerations is tax residency, as dual citizens may be considered tax residents in both countries, potentially leading to double taxation on their worldwide income. U.S. citizens pay taxes to the U.S. federal government regardless of their place of residence, therefore if they move their residence abroad, they are still bound to their U.S. tax liability. Tax treaties between countries may provide relief from double taxation through tax credits or deductions.

However, different countries have different treaty agreements (or may not have a treaty agreement with the U.S.), so it is important to understand the provisions of those treaties to optimize tax planning. Compliance with tax filing requirements in both countries in which you reside is essential to avoid penalties. It is important to hire a professional who is familiar with the tax laws in both countries, as this process can be particularly complicated.



Estate and Inheritance Planning. Dual citizenship can also present unique estate and inheritance planning implications and opportunities that require careful consideration. One of the key aspects to address is the potential application of estate and inheritance taxes in both countries where the individual holds citizenship.

Each country will have its own tax laws governing the transfer of assets upon death, which could result in double taxation if not managed effectively. Proper estate planning becomes essential to minimize tax liabilities and ensure that assets are distributed according to the individual's wishes. Additionally, understanding the differences in inheritance laws between two countries is crucial, as they may impact the distribution of assets and the rights of potential heirs.

Having dual citizenship can also affect the choice of beneficiaries and trustees for trusts established in either country. Seeking professional advice from estate planning experts with knowledge of international tax laws and regulations is vital to developing a plan that aligns with your overall goals.

**Choosing a Professional Team.** Finding the right professional team to guide you through the dual citizenship process can be challenging and time-consuming. Not all advisors operate with the same expertise or objectivity, so it is important to identify any potential conflicts of interest. Look for an immigration-focused law firm that partners with trusted professionals in the countries you are considering.

**Cost.** Citizenship by lineage is by far the most economical path, so it is strongly recommended to determine whether you qualify as the first step. Outside of that option, costs can increase significantly. Before engaging a professional, ask for a full range of projected costs or consider agreeing to a fixed fee. Setting expectations upfront is important. If you are applying for an entire family, fees will rise accordingly, and some programs do not allow for family reunification. In addition to application fees, the required investment or contribution can range from several hundred thousand dollars to over one million.

**Timing.** The time required to acquire a second passport varies significantly by country and pathway. Citizenship by lineage typically takes 1–3 years, depending on documentation and country backlog. Golden Visa pathways generally require 5–10 years of legal residency before citizenship eligibility, though recent legal changes in some countries—such as Portugal—may extend this to 10+ years in practice. Processing times and program requirements vary and can change with little notice.

**Motivation.** It is important to thoughtfully explore your motivations for pursuing dual citizenship. Living abroad represents a significant lifestyle change, especially if the country is unfamiliar. Many factors should be considered, including lifestyle, language, medical resources, and legal and tax implications. If the primary goal is simply to have a “backup plan,” it is worth evaluating whether that objective justifies the time and the cost.

Dual citizenship offers a wide range of opportunities and benefits but also comes with important considerations and responsibilities. Understanding the tax, legal, and administrative implications is essential. We are here to help you navigate this process successfully.



## ABOUT THE AUTHOR



**Karen Leech, CPWA**<sup>®</sup>, sees herself as a navigator, in a sense, guiding clients through the many different planning stages of their lives and making sure their investment strategies align with their personal goals through transitions like retirement, divorce or loss of a spouse. She also has a keen interest in finding ways to help her clients have a positive social impact and has worked with a number of clients to develop and implement an impact investment strategy.

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