



Michael Diamond, Adv.

מיכאל דיאמונד ע"ד

These pages have been prepared by Michael Diamond, Adv. as a public service and are subject to the disclaimer below.

Inheritance - International Considerations

Complications often arise in Inheritance Law where a person living in Israel dies leaving property in more than one country. Orders need to be obtained from Israeli courts, but often foreign court orders are required too. With proper Estate Planning, the expense and complexity of this process can be minimized.

Intestate (without leaving a Will)

In general, if the deceased did not leave a Will, a legal order must be obtained in the relevant country. Each country will have its own rules about Intestate Succession. Under Israel's Inheritance Law 1965, if the deceased was domiciled in Israel, Israeli courts will have jurisdiction.

In technical terms, in each country in which the deceased had property, the relevant court will need to issue an order and give formal instructions to distribute the estate. Some countries may accept a formal declaration issued by the court of another country - but this too requires legal and/or administrative procedures. This can be a complicated and drawn-out process that can incur considerable expense. Beneficiaries have to wait to receive their entitlement.

Testate (leaving a Will)

Is a Will made in one country valid for property situated in another country?

In theory, it could be, but the legal and administrative procedures make it time-consuming, inefficient and expensive. It is highly recommended that you create a separate Will for each country in which you own property. At the appropriate time, the Will can be presented to the court for grant of Probate, a relatively quick and inexpensive procedure.

Disclaimer: This description is for information purposes only. It is not legal advice and should not be treated as such. Every effort is made to keep it up to date, but some items may have slipped through. The information contained herein makes no attempt to replace the services provided by a qualified professional and you should never delay seeking or disregard legal advice because of what's written (or omitted) here. Before taking any action based upon the contents of this site, it is highly recommended that you seek personal legal advice.

© Michael Diamond 2015

Tel: +972-54-6775501

michaeldiamondlaw@gmail.com
www.michaeldiamond.biz

054 6775501 :ל70