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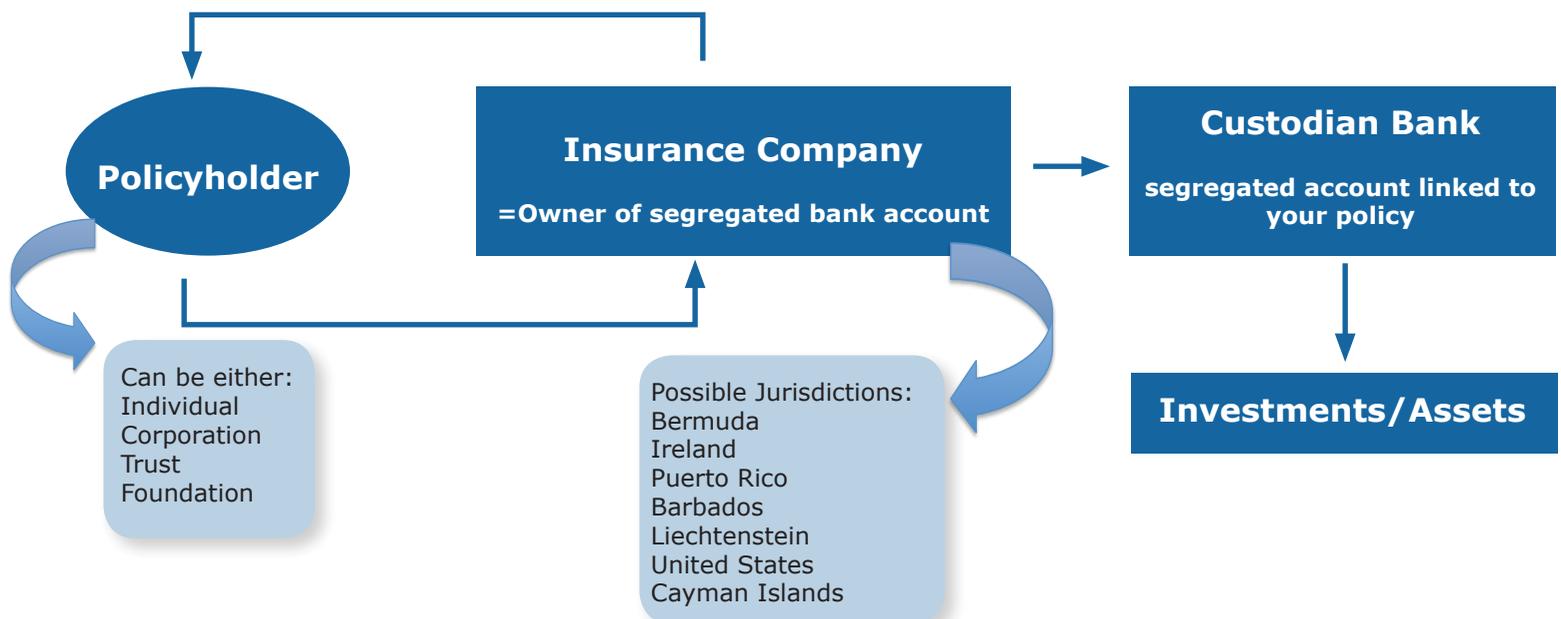
A secure island in a tax hungry world

Give Your Clients Greater Control Within a Simpler Structure Using Expanded Worldwide Planning (EWP)

by
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Have you heard of Expanded Worldwide Planning (EWP)?¹ You have heard of FATCA, CRS, and BEPS - well, within these confines, why not embrace greater freedom: EWP allows you to simplify your existing structures and minimize your reporting obligations under FATCA and CRS. The total fee is approximately 1% of the client's assets inside the structure.² At Advanced Financial Solutions, we are finding that clients are requesting simpler structures that offer full transparency. This white paper introduces you to one that gives advisors multiple creative opportunities to achieve this aim.

In its core, an EWP is a properly structured Private Placement Life Insurance (PPLI) policy in a jurisdiction appropriate to the client's other planning needs. The other elements in the EWP structure differ depending on the individual client situation. Advisors must factor in the client's nationality, country of origin, country(s) of domicile, the insurance regulations of all the jurisdictions involved, the tax reporting obligations of all the entities in the structure, and the planning aims of the client. Our chart below outlines some of the possibilities for planning using EWP.



Under the segregated account legislation of the PPLI policy jurisdictions listed in our chart, the insurance company becomes the beneficial owner of the assets inside the policy.³ The reporting obligations under FATCA and CRS differ for each of the policy jurisdictions on our chart. The goal of EWP is to give clients full compliance with all existing tax regulations while still retaining the utmost possible privacy for them.

The old offshore world is in flux and in the process of redefining itself. This creates new possibilities for planning that did not previously exist. Whatever the nationality of your client and their very particular needs, we can supply you with compliant solutions. Each of the PPLI policy jurisdictions listed in our chart can provide vastly enhanced planning possibilities in this open architecture environment. The trust, or other policy holder entity, can be domiciled anywhere in the world, and the assets inside the policy can also be located anywhere in the world. Please reflect on these new possibilities. We welcome your inquiries, questions, and comments.

Endnotes

1. Wikipedia, "Private Placement Life Insurance," section on "PPLI outside the USA," https://en.wikipedia.org/wiki/Private_placement_life_insurance

2. Insurancenewsnet.com, Registered Rep, "What is PPLI?" see "PPLI Costs," <http://insurancenewsnet.com/oarticle/powerful-private-placement-life-insurance-strategies-with-trusts> and Kirk Loury, *The PPLI Solution: Delivering Wealth Accumulation, Tax Efficiency, and Asset Protection Through Private Placement Life Insurance* (2005), page nine

3. The segregated account legislation differs somewhat in the PPLI policy jurisdictions listed in our chart. Commonly, assets in an insurance company's segregated portfolios and the accounts in which those assets are held are legally and beneficially owned solely by the insurance company. As defined by both FATCA and CRS, this is for Cash Value Insurance Contracts. It is not in the scope of this white paper to define in detail the reporting obligations of the various asset managers, trust companies, and other intermediaries within each of the PPLI policy jurisdictions listed in our chart. Suffice it to say that this will vary widely depending on the individual structure adopted for the client, and where the assets inside the policy are located, and many other factors.

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