



## [How PPLI Negotiates for You](#)

### [World Leaders Teach EWP](#)

Negotiating is at the heart of [Expanded Worldwide Planning](#) (EWP), and [Private Placement Life Insurance](#) (PPLI). What can we learn from the much publicized negotiation between [Donald Trump](#) and [Kim Jong Un](#)? One thing is obvious about this meeting. We don't really know much. The most substantive talks were held in private between the two leaders. As the saying goes, "After all is said and done, more is said than done."

So what we read in the press about this negotiation is mostly speculation and conjecture, and another part is supplied by our own attitudes towards these world leaders and their countries. This is precisely what is avoided in [EWP](#). By using a properly structured [PPLI policy](#), we are able to build a plan on a strong foundation of knowledge.

A good part of this solid foundation is insurance regulations. These regulations tend to be simpler and more straightforward than the tax codes of the world's countries, and supply many key benefits that are not allowed under tax codes.

One definition of negotiating from the Wiktionary is "To [succeed](#) in [coping](#) with, or getting over something." This is why we can say *PPLI NEGOTIATES FOR YOU*. It allows you to succeed using the key elements of EWP: [privacy](#), [asset protection](#), [succession planning](#), [tax shield](#), [compliance simplifier](#), and [trust substitute](#).

How this ability to succeed in planning for wealth international families plays out in detail depends on the particulars involved: where the family reside; the tax codes of the countries where the various family members reside; the nationalities of these family members; the assets involved; and most importantly, the tax and estate planning aims of the family. All these elements are part of a successful EWP engagement, and what our firm enjoys most--giving families the most cost efficient and comprehensive plan possible.

## History of PPLI

In the various press stories on the Trump and Kim Jong Un negotiation are historical perspectives going back to Kim's father and grandfather. This made us realize that we have never given you a history of PPLI. Here is a short one courtesy of *Trusts & Estates* by Grant R. Markuson.

“PPLI really began as a way of customizing specific types of insurance products as part of corporate benefit planning for senior executives. Although the rank and file employees may have been happy with the benefits of more typical insurance offerings, senior executives often desired greater investment options, lower fees, and greater overall customization. This, in conjunction with the growing use of variable contracts, led to the birth of individualized PPLI products. The Internal Revenue Service (Service) initially ruled on these types of customized variable products in a series of Revenue Rulings from 1977-1982.

In the early 1990s, PPLI products for wealthy individuals surfaced again out of the Channel Islands. Soon after that, Cayman Island and Bermuda based products started to surface. As the hedge fund industry started to pick up steam during this period, many of the products were being specifically developed for these investments. In the mid 1990s, many of the major U.S. and European carriers entered the international PPLI market, which brought this type of planning back into the mainstream.”

**To bring our brief history up to the present, we find a robust appetite for PPLI and EWP at present with the fast paced growth of wealthy international families throughout the world. Using PPLI and EWP at the service of these families can achieve bespoke solutions not possible with other methods of international tax planning.**

We welcome the opportunity to negotiate on your behalf and reach a successful result for all concerned. Thank you for your continued trust and support. Please give us your thoughts.

by [Michael Malloy](#), CLU TEP, @ [Advanced Financial Solutions, Inc](#)

michaelmalloy.solutions



**Michael Malloy, CLU, TEP**  
Advanced Financial Solutions, Inc.



New York  
British Virgin Islands  
California

[blog.michaelmalloy.solutions](http://blog.michaelmalloy.solutions)  
[michael@michaelmalloy.solutions](mailto:michael@michaelmalloy.solutions)

**Worldwide Toll-Free Number:**  
**+1 877-811-5846**

**Michael's Direct Dial:**  
**530-277-1088**

**Northern California Office:**  
**530-692-1007**

