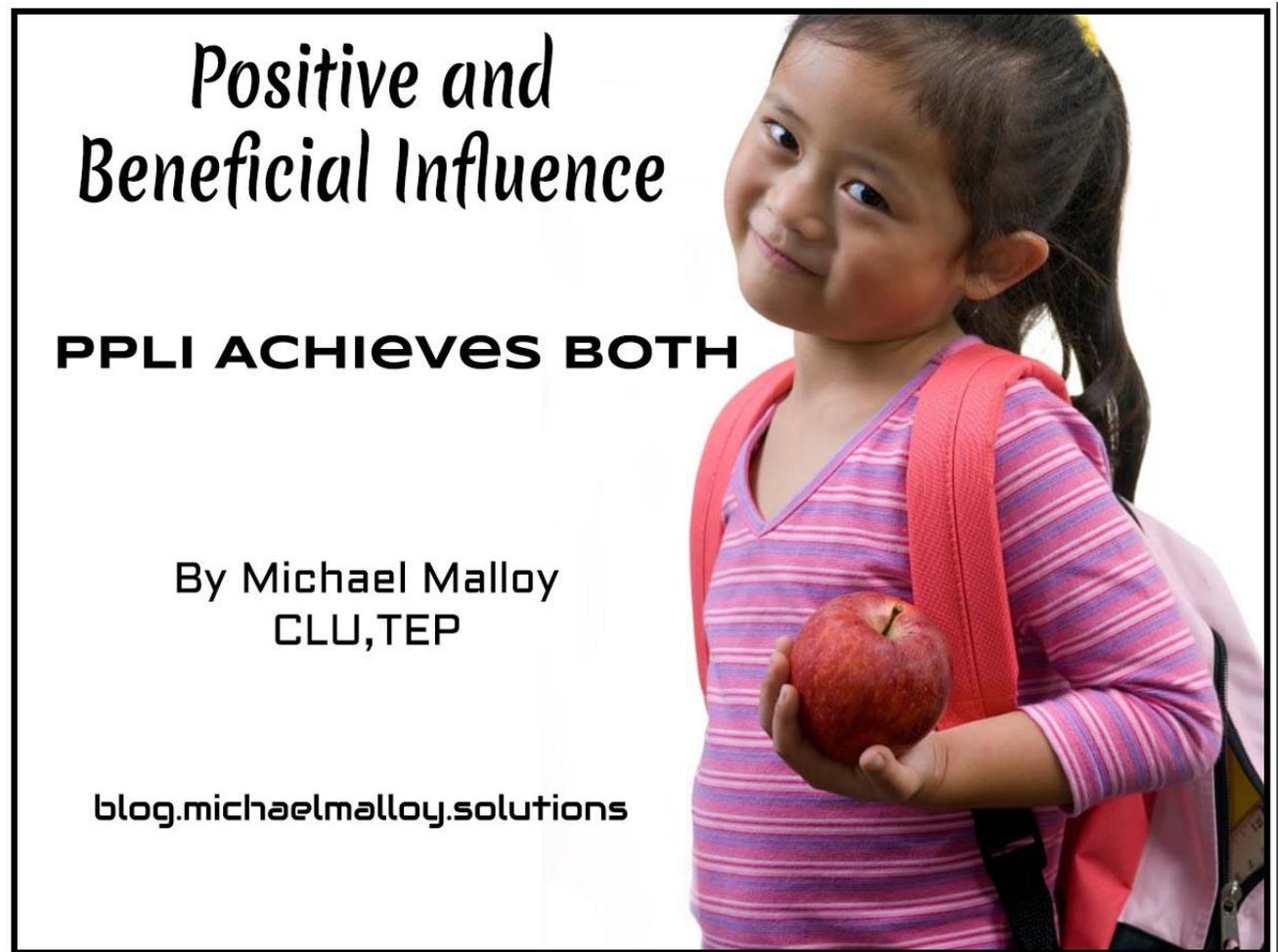


Positive and Beneficial Influence



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PPLI ACHIEVES BOTH

By Michael Malloy
CLU,TEP

blog.michaelmalloy.solutions

PPLI Achieves Both

[A Private Placement Life Insurance \(PPLI\) structure](#) exerts a positive and beneficial interest on the assets which it holds. Let us examine how this is accomplished, and also what it means to exert influence. Babies and small children learn very soon how to exert influence on their parents.

I was having dinner with a five year old and his parents recently, and when the five year old ceased to be the center of the conversation, he would emphatically say, “*I have something very important to tell you.*” Of course, our conversation would cease and the five year old was very pleased!

PPLI achieves this benign influence over assets by employing the [*six key elements of Expanded Worldwide Planning \(EWP\)*](#). I would say that this influence is much greater than benign--it is transformative. Let us briefly state the importance of these six elements in creating a transformative PPLI policy structure.

[*Privacy*](#) This is a key element. With [*FATCA*](#), [*CRS*](#), and Registers of Beneficial Ownership our clients are looking for ways to keep their affairs private, and still be compliant with tax authorities worldwide. But as you know, it takes [*study and constant attention to detail*](#) to create a proper structure.

[*Tax Shield*](#) In high tax jurisdictions, a tax shield is important. Why pay more tax than is necessary? If there is a PPLI structure than can give you a tax-free environment wouldn't it be desired by our clients?

[*Asset Protection*](#) Asset protection is an element that almost all clients seek. Making their assets inaccessible to former spouses, creditors, and those seeking to claim them without legal authority. An excellently crafted PPLI structure can also accomplish this for them.

[*Succession Planning*](#) Especially in jurisdictions that have forced heirship rules, succession planning is vital to clients. Most clients wish to distribute their assets according to their wishes and not according to a plan that they don't agree with.

[*Compliance Simplifier*](#) In today's world attempting to hide assets only draws more attention to them. Most clients wish to be compliant with the world's tax authorities, and at the same time keep as much privacy as possible. Finding our way in this maze of regulations is an important element.

[*Trust Substitute*](#) In some jurisdictions, in particular, those that use civil law as opposed to common law, a trust substitute would be useful. Why create an entity that in the end will just be ignored by tax and legal authorities? Why not have a PPLI structure that works both in civil and common law jurisdictions?

In the realm of politics, lobbying government officials is a method of attempting to exert influence. There is an outcry of concern when this influence is considered undue influence, and this is defined differently throughout the world. What is [*lobbying*](#) in one country might be considered bribery in another country.

[*This article by Julie Bykowicz*](#) caught our eye this week in one of our favorite publications, *The Wall Street Journal*,

“The New Lobbying: Qatar Targeted 250 Trump ‘Influencers’ to Change U.S. Policy. Blockaded by Mideast neighbors, the emirate employed an unconventional lobbying campaign to win over an unconventional U.S. president.”

“Longtime New York restaurateur Joey Allaham visited Manhattan’s Park East Synagogue late last year with an offer for lawyer Alan Dershowitz. Come visit Doha, the capital of Qatar, by invitation of the emir.

Mr. Dershowitz says he hadn’t met Mr. Allaham before and initially demurred before agreeing to go. The professor also didn’t know he was on a list of 250 people Mr. Allaham says he and his lobbying-business partner, Nick Muzin, identified as influential in President Trump’s orbit.

The list was part of a new type of lobbying campaign Qatar adopted after Mr. Trump sided with its Persian Gulf neighbors who had imposed a blockade on the tiny nation. Qatar wanted to restore good relations with the U.S., Mr. Allaham says. Win over Mr. Trump’s influencers, the thinking went, and the president would follow.”

We look forward to lobbying on your behalf to create a PPLI structure that employs all six of the key elements of [EWP](#).

[Please let us know how we can serve you to this end](#). Place your comments at the end of this post and [sign up to get updates](#).

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
michael@michaelmalloy.solutions

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

Michael's Direct Dial:
530-277-1088

Northern California Office:
530-692-1007

