



# Some Alternatives for Blacklisted Jurisdictions

working around black and grey lists



# Formal and informal blacklists

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- Latin America
- Spain / Italy
- Russia
- OECD
- G20
- US?



# OECD Report

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- Earlier releases in 2000, 2001, 2004
- 2 April 2009 Progress Report on “Jurisdictions that have substantially implemented the internationally agreed tax standard’
- Model Agreement on Exchange of Information in Tax Matters (12 minimum for “white” list)



# Treaties since April 2009

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- Greenland - San Marino (22 September 2009)
- France - San Marino (22 September 2009)
- Andorra - San Marino (21 September 2009)
- Andorra - Liechtenstein (18 September 2009)
- Austria - Gibraltar (17 September 2009)
- Austria - Andorra (17 September 2009)
- Austria - Monaco (17 September 2009)
- Austria - St Vincent & the Grenadines (14 September 2009)
- Netherlands - British Virgin Islands (11 September 2009)
- Netherlands Antilles - British Virgin Islands (11 September 2009)
- St Kitts & Nevis - Netherlands Antilles (11 September 2009)
- St Kitts & Nevis - Aruba (11 September 2009)
- Denmark - Aruba (10 September 2009)
- The Faroe Islands - Aruba (10 September 2009)
- Finland - Aruba (10 September 2009)
- Greenland - Aruba (10 September 2009)
- Iceland - Aruba (10 September 2009)
- Norway - Aruba (10 September 2009)
- Sweden - Aruba (10 September 2009)
- Denmark - Netherlands Antilles (10 September 2009)



# Treaties since April 2009

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- The Faroe Islands - Netherlands Antilles (10 September 2009)
- Finland - Netherlands Antilles (10 September 2009)
- Greenland - Netherlands Antilles (10 September 2009)
- Iceland - Netherlands Antilles (10 September 2009)
- Sweden - Netherlands Antilles (10 September 2009)
- The Faroe Islands - San Marino (10 September 2009)
- United States - Monaco (8 September 2009)
- Denmark – Turks & Caicos Islands (7 September 2009)
- Netherlands - Antigua & Barbuda (2 September 2009)
- Denmark - Antigua & Barbuda (2 September 2009)
- Denmark - Gibraltar (2 September 2009)
- Denmark - Anguilla (2 September 2009)
- Germany - Liechtenstein (2 September 2009)
- Netherlands - St Vincent & the Grenadines (1 September 2009)
- Denmark - St Vincent & Grenadines (1 September 2009)
- Denmark - St Kitts & Nevis (1 September 2009)
- Denmark - Antigua & Barbuda (1 September 2009)
- Netherlands – St Kitts & Nevis (1 September 2009)
- Canada - Netherlands Antilles (29 August 2009)
- United Kingdom - Gibraltar (27 August 2009)



# Treaties since April 2009

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- Australia - Gibraltar (25 August 2009)
- New Zealand - British Virgin Islands (14 August 2009)
- New Zealand - Cayman Islands (14 August 2009)
- New Zealand - Gibraltar (13 August 2009)
- Germany - Gibraltar (13 August 2009)
- United Kingdom - Liechtenstein (11 August 2009)
- Monaco - San Marino (29 July 2009)
- Bermuda - Ireland (28 July 2009)
- New Zealand - Isle of Man (27 July 2009)
- New Zealand - Jersey (27 July 2009)
- United Kingdom - Turks & Caicos (23 July 2009)
- Netherlands - Turks & Caicos (22 July 2009)
- Netherlands - Anguilla (22 July 2009)
- Ireland - Turks & Caicos (22 July 2009)
- Ireland - Anguilla (22 July 2009)
- New Zealand - Guernsey (21 July 2009)
- UK - Anguilla (20 July 2009)
- Belgium - Monaco (15 July 2009)
- New Zealand - Cook Islands (9 July 2009)
- Netherlands - Cayman Islands (8 July 2009)
- Germany - Bermuda (3 July 2009)
- Greenland - Cayman Islands (1 April 2009)



# Treaties since April 2009

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- Iceland - Cayman Islands (1 April 2009)
- Norway - Cayman Islands (1 April 2009)
- Sweden - Cayman Islands (1 April 2009)
- Ireland - Gibraltar (24 June 2009)
- Ireland - Cayman Islands (23 June 2009)
- France - British Virgin Islands (17 June 09)
- Australia - Jersey (10 June 2009)
- The Netherlands - Bermuda (8 June 2009)
- Denmark - British Virgin Islands (19 May 2009)
- Faroes - British Virgin Islands (19 May 2009)
- Finland - British Virgin Islands (19 May 2009)
- Greenland - British Virgin Islands (19 May 2009)
- Iceland - British Virgin Islands (19 May 2009)
- Norway - British Virgin Islands (19 May 2009)
- Sweden - British Virgin Islands (19 May 2009)
- New Zealand - Bermuda (17 April 2009)
- Denmark - Bermuda\_ (16 April 2009)
- Faroes - Bermuda\_ (16 April 2009)
- Finland - Bermuda\_ (16 April 2009)
- Greenland - Bermuda\_ (16 April 2009)



# Treaties since April 2009

The Corpag Group

- Iceland - Bermuda\_ (16 April 2009)
- Norway - Bermuda\_ (16 April 2009)
- Sweden - Bermuda\_ (16 April 2009)
- Denmark - Cayman Islands (1 April 2009)
- Faroes - Cayman Islands (1 April 2009)
- Finland - Cayman Islands (1 April 2009)



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# Using **Party** White Listed Jurisdictions



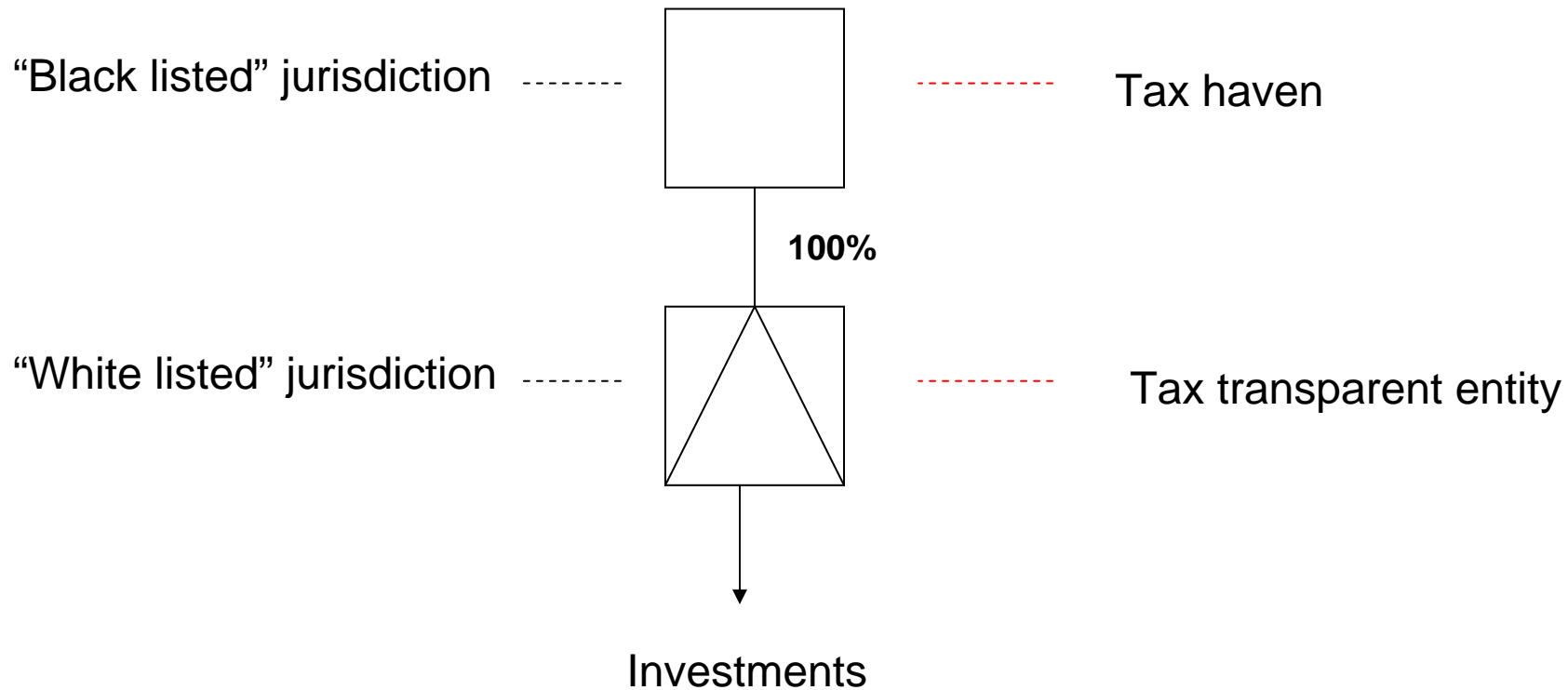
## Reasons to use white listed jurisdiction:

1. Tax (Brazil – transfer pricing issues)
2. Reputation for business partners / not showing offshore activities
3. Legal system
4. Investment protection treaties  
(Venezuela / Latin America in general)



# Pass through entities

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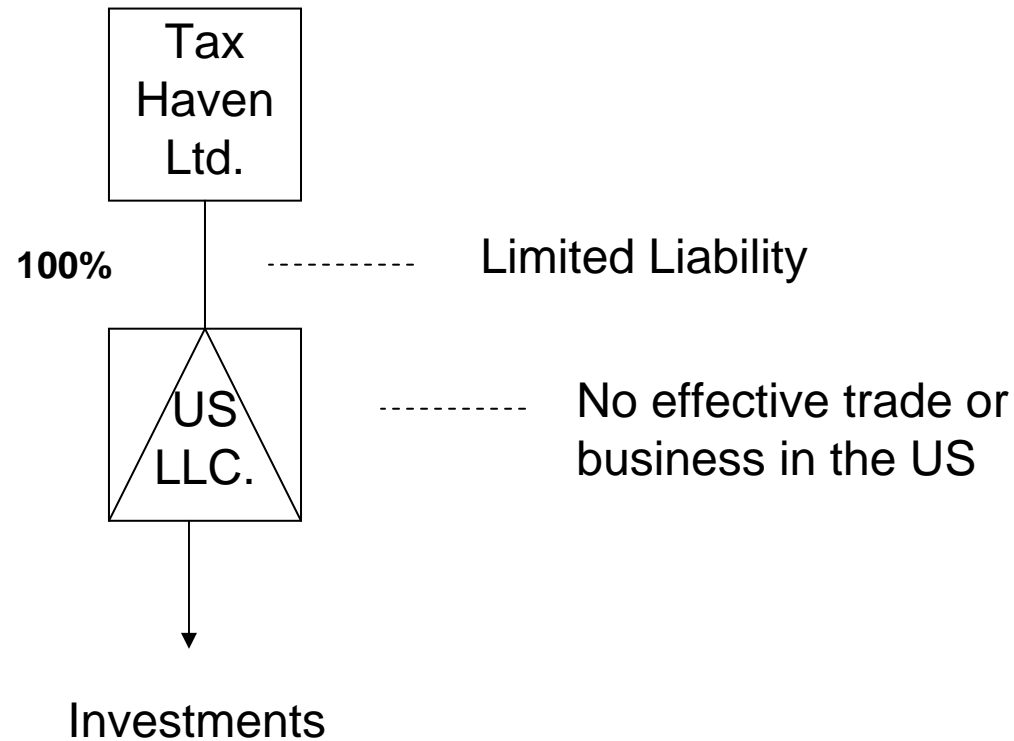




# Single Member US LLC

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Please note  
FBAR reporting !

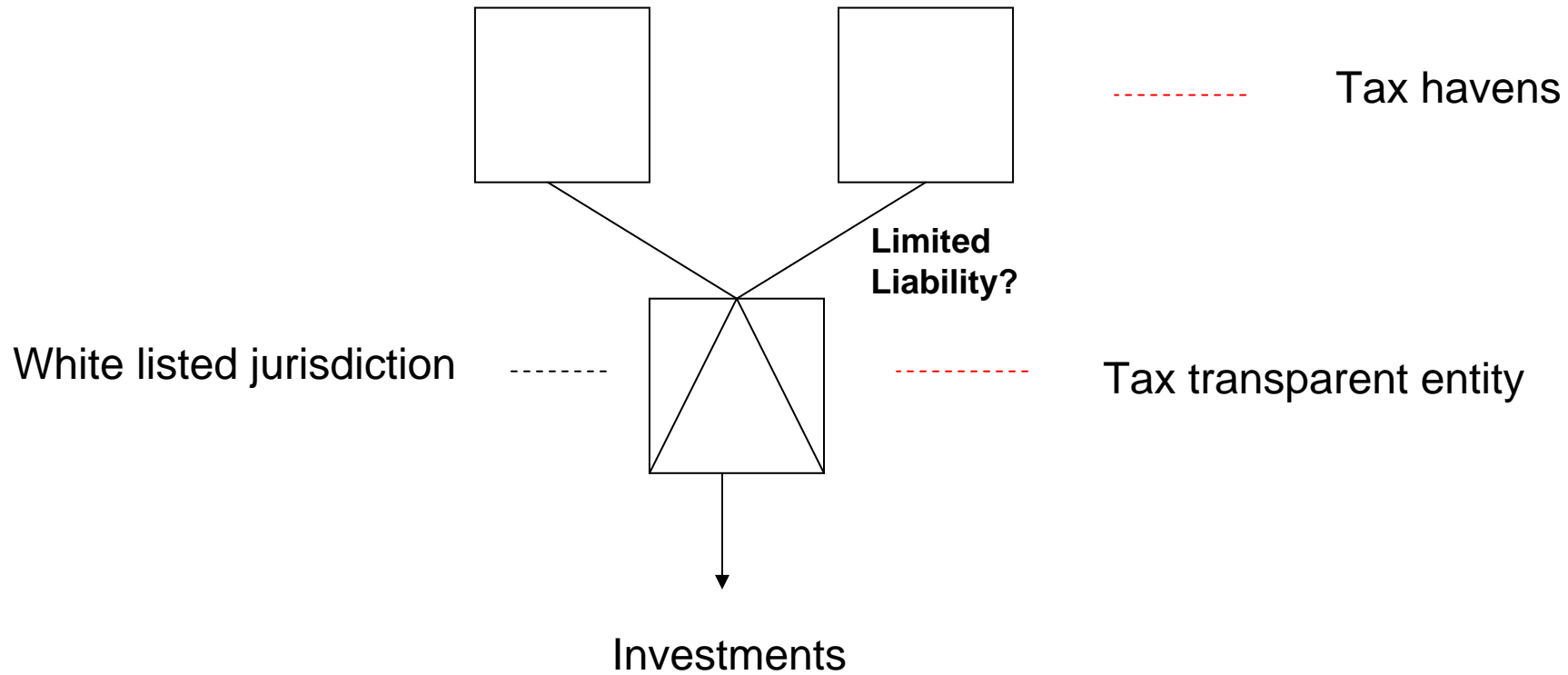




# Partnerships

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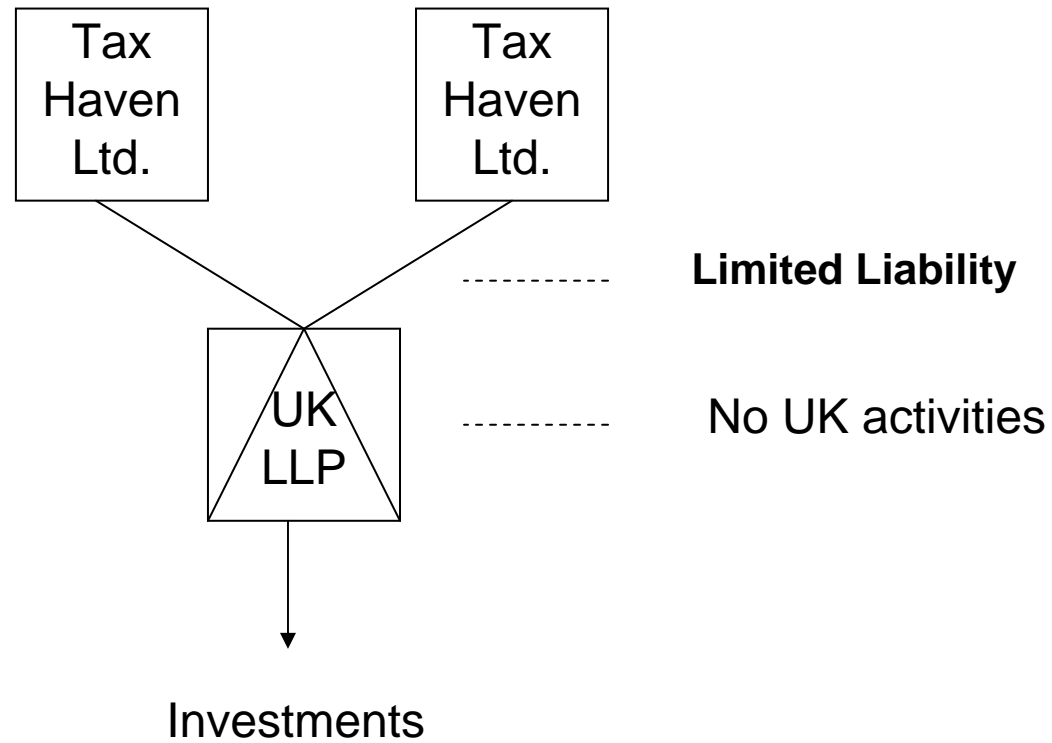
“Black listed” jurisdiction





# UK LLP

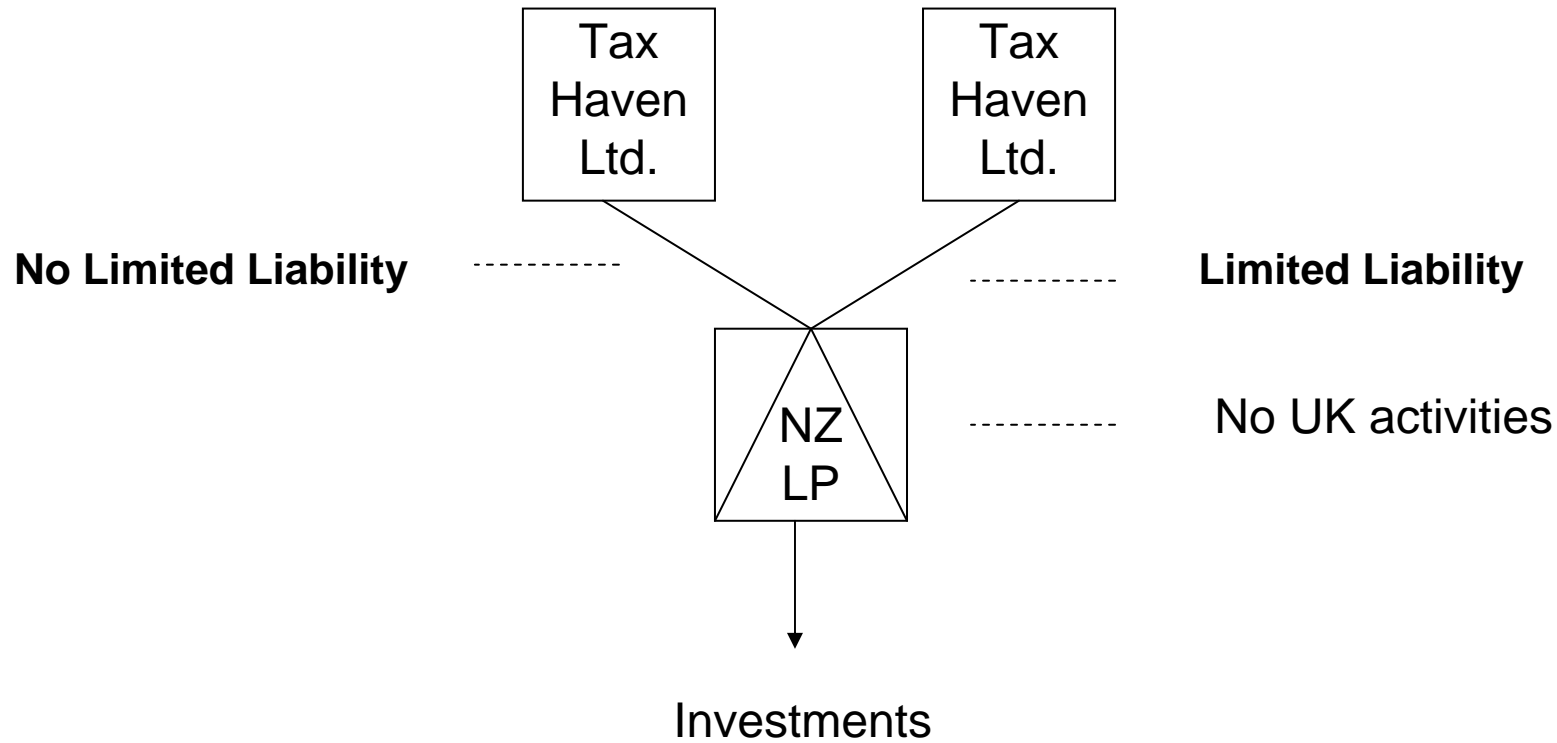
The Corpag Group





# New Zealand LP

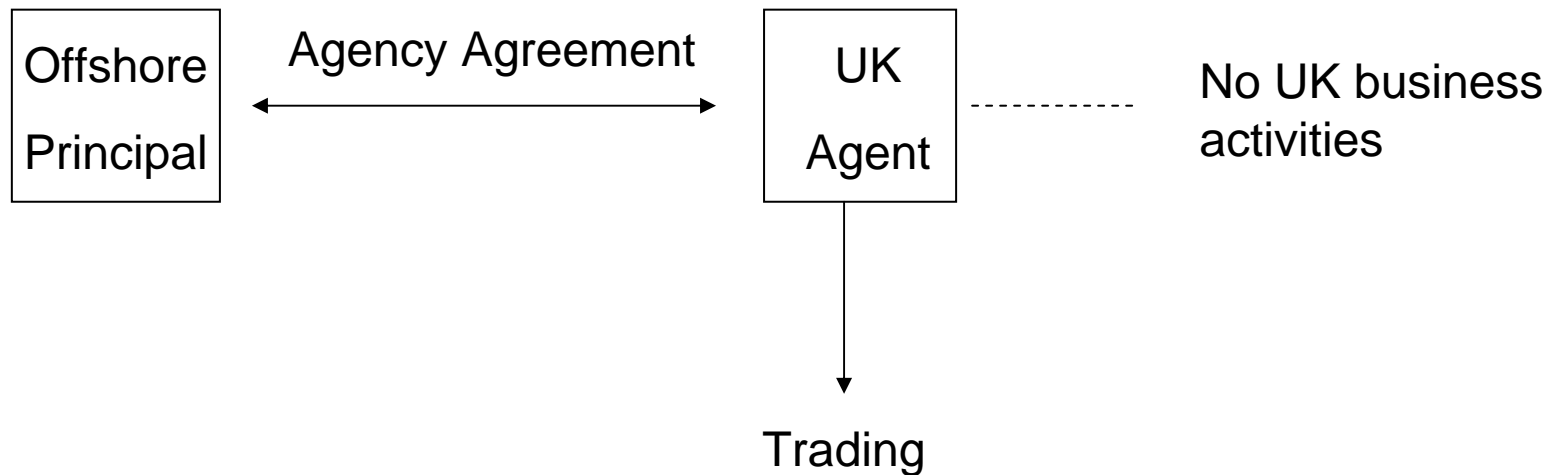
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# UK / Irish Agency Structures

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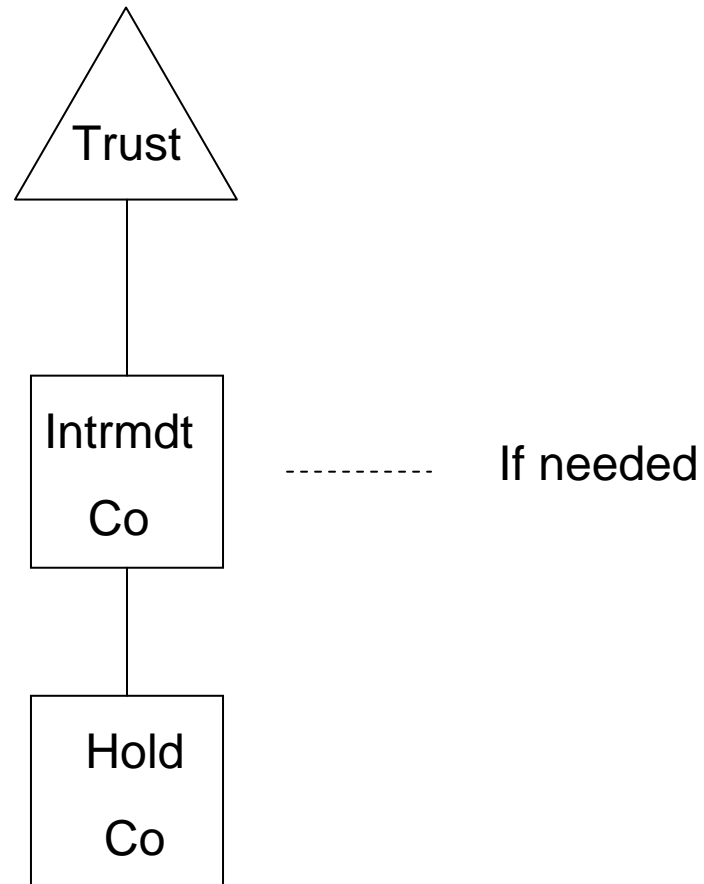
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# Using **Fully** White Listed Jurisdictions



# Holding Structures

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# Jurisdictions

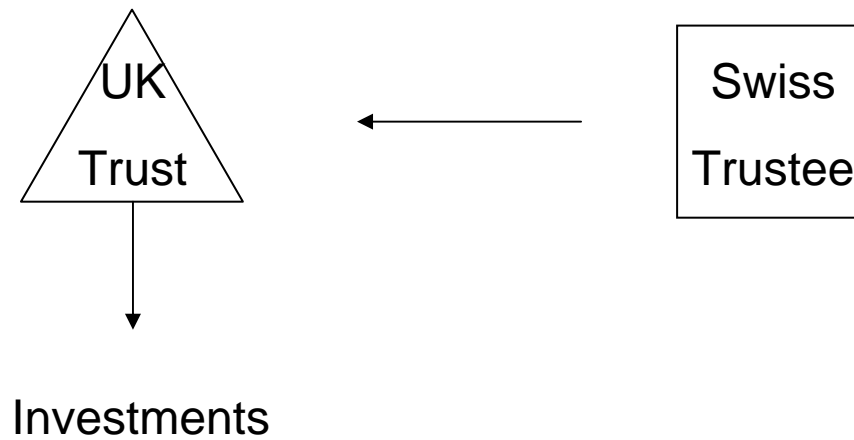
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- For tax treaty purposes
  - Netherlands
  - UK
  - Spain
  - Ireland
  - Luxembourg
  - Cyprus, Malta
- Also for non tax treaty purposes
  - Hong Kong / Singapore



# Use of Trusts

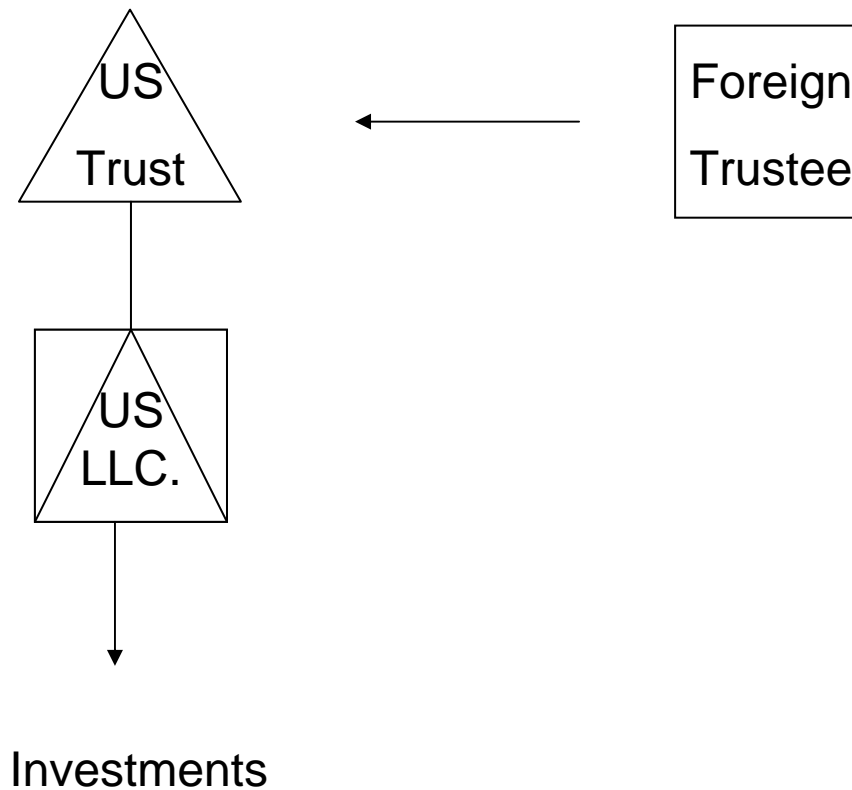
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# Use of Trusts (2)

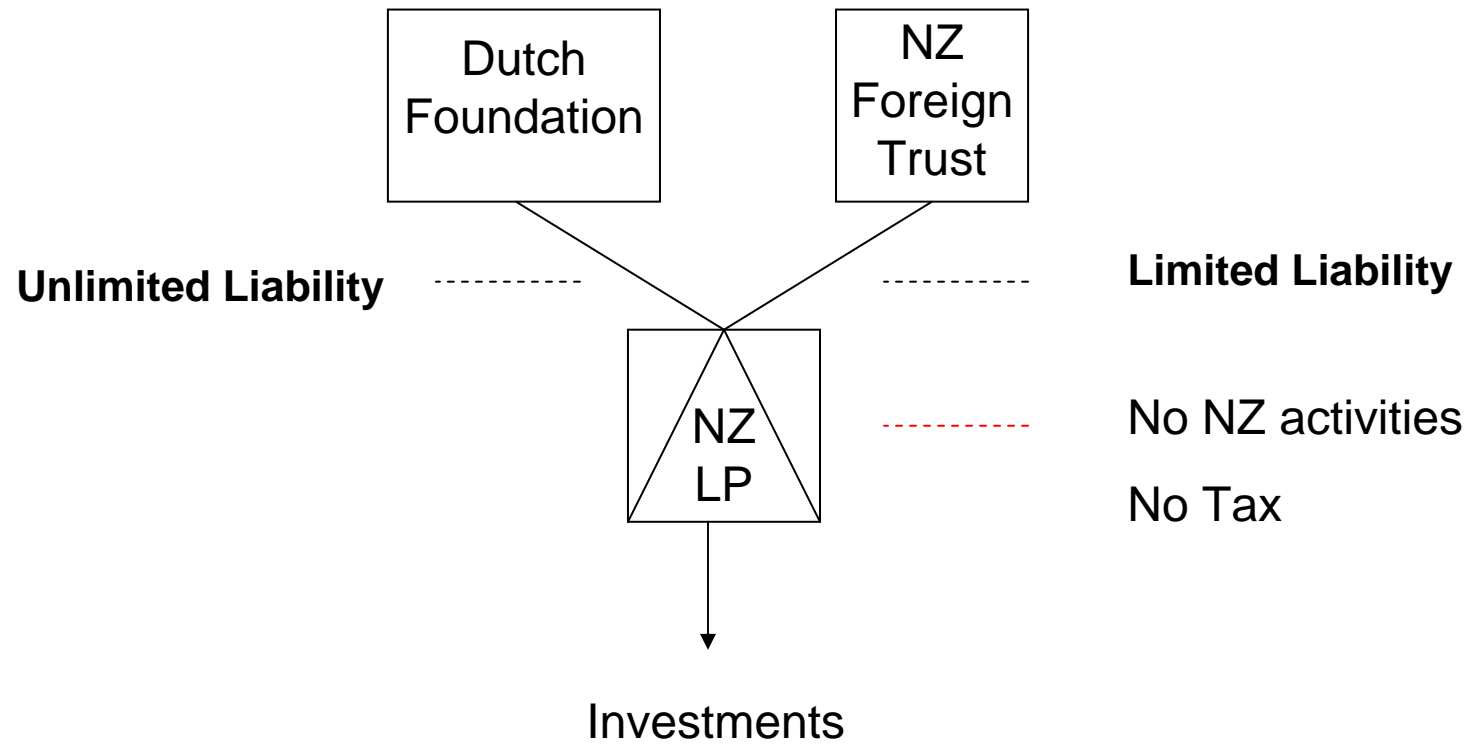
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# New Zealand

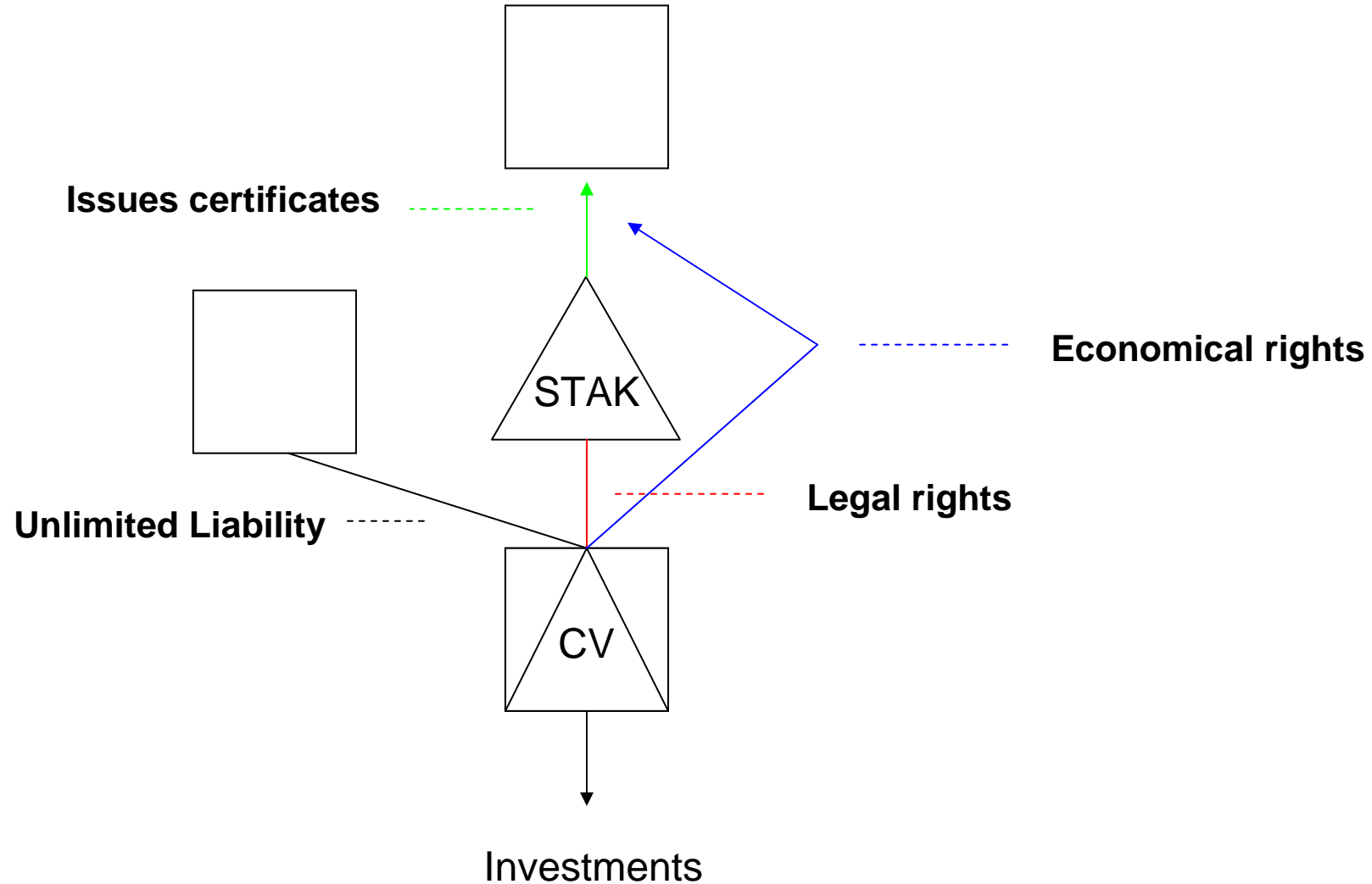
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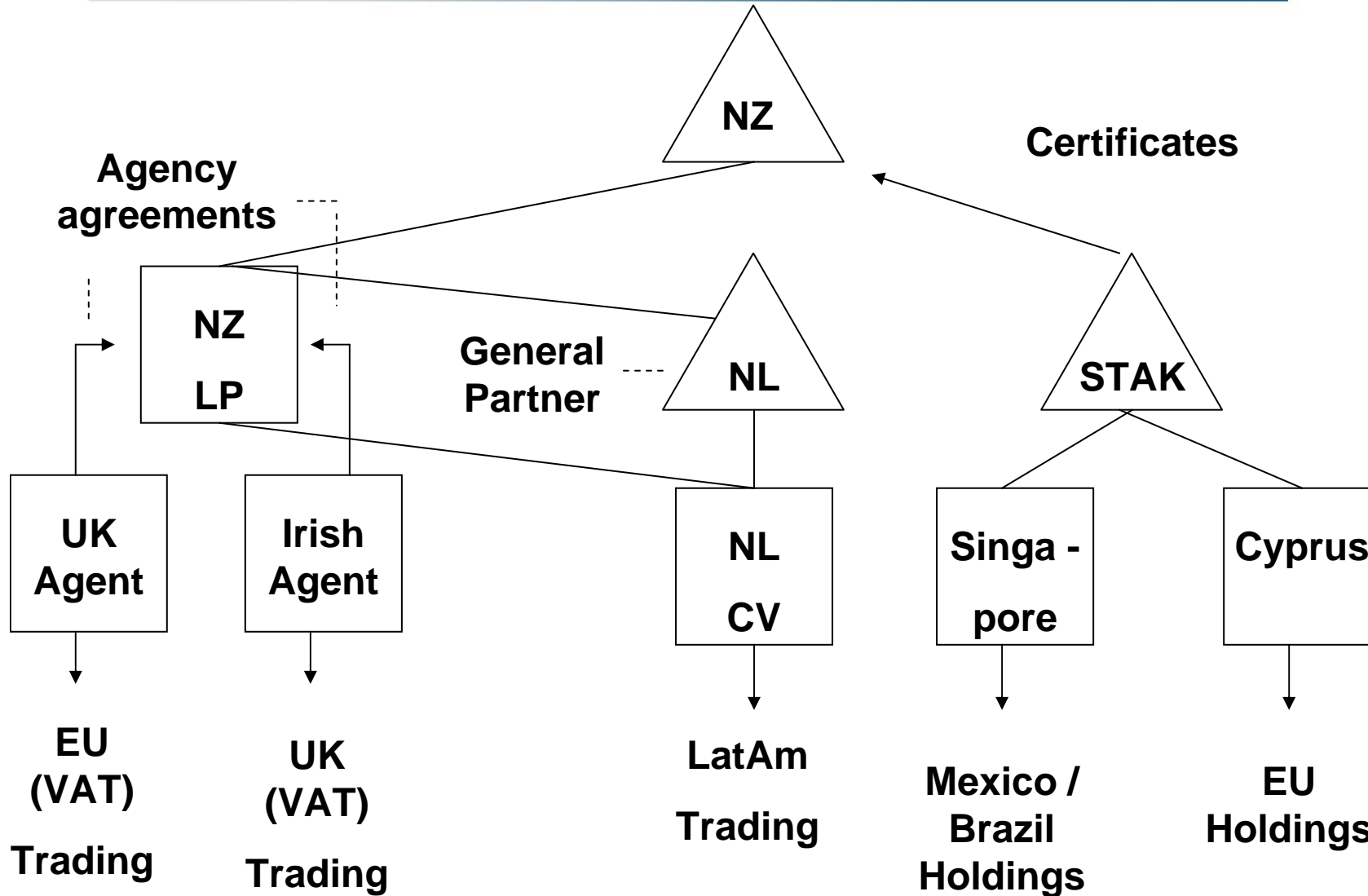




# STAK

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# It is becoming easier!

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- Netherlands Antilles
- Cayman
- Luxembourg
- BVI
- Switzerland

## Getting there...

- Gibraltar
- St. Kitts
- Etc..



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## The Corpag Group

**Anguilla, Aruba, Brazil, BVI, Cyprus, Malta, Miami (rep. office)  
the Netherlands Antilles, Netherlands, Nevis, New Zealand, Panama, St. Lucia, Switzerland,  
and the United Kingdom. Monaco services provided through our associate Jason S.A.M.**

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