

From: Pat - Offshore Companies International pat@offshorecompaniesinternational.com 
Subject: Revisiting Cayman Incorporation & Next Steps
Date: October 31, 2025 at 12:54 AM
To: Travis Sheppard travis_sheppard@mac.com
Cc: Alexandra - Offshore Companies International alexandra@offshorecompaniesinternational.com



Hi Travis,

Thank you for your inquiry.

Certainly we can assist you to incorporate a Caymans Company & a Delaware C Corp. We don't do Spanish company incorporations sadly (mind you given you are based at least part time in/your connections in Spain I assume you could source a local Company formation agent there easier than I could!)

We seem to be regularly being asked to set up AI Consulting Companies of late – and you'll no doubt be pleased to hear that such a business lends itself well to an Offshore Corporate Structuring Plan - see attached which explains how/why.

The quote/requirements for Caymans Incorporation remain as per my email of 18 Feb. See attached + check this page of our website for details of our Delaware Company services: <https://offshoreincorporate.com/usa-limited-liability-companies-llcs/>

For the record I don't agree with all the suggestions of your US counsel. Firstly he's overlooked (or is not aware that?) in order to get around CFC rules (*which would make the profits of the proposed enterprise taxable where you're tax resident*) you'll need to set up a *Private Foundation* at the base of the structure ie as your ultimate Holding Entity. (You might want to go back and re-read my email of 24 Feb – copied below - which addresses this issue in more detail).

Secondly I'm not convinced that Caymans is an ideal jurisdiction any more for an IP Holding Company – in short you'd need to probably also set up an office in and have staff in Caymans in order to meet/pass the new Caymans ES (Economic Substance) requirements.

(FYI, I recently authored a research paper for a, Dubai based, multi national food retailer which looks at the potential jurisdictions for an IP Company see attached in confidence a copy of same).

How To Proceed

To move forward with the set-up of a Caymans Company and a Delaware Corp you would need to:

1. Complete, sign and email me an order form (see attached + a guide which explains how to complete).
2. Email me KYC as per the jurisdiction's requirements (See Pdf attached).

What I would suggest as a next step is:

- You complete the form to the best of your ability
- **Highlight in the order form** any question you can't answer or are not sure how to answer

HOW TO ANSWER:

- Email me the order form unsigned
- I will review and then either email you my comments or come back to you with available/suggested conference call times
- (If I've suggested a conference call) You then select and let me know your preferred conference time. I will call you at that time and during the conference call I will assist you to answer any unanswered/problem questions

As a good will gesture I'm happy do one more free conference call with you (after that it will be pay for play).

Presently I can offer you the following conference times - all at my time (ie + 8 GMT) which is same time zone as Beijing/Shanghai/Singapore, 4 hours ahead of Dubai, 2.5 hours ahead of Delhi India, 8 hours ahead of UK, 7 hours ahead of CET (ie Central European time), 6 hours ahead of Joburg and 12 hours ahead of New York/Toronto SUMMER time:

Week commencing 26 October

Friday: 3pm, 4pm, 8pm, 9pm, 10pm

Saturday: 9am, 12 midday, 1pm, 2pm

Week commencing 2 November

Monday: 9am, 12midday, 1pm, 2pm, 3pm, 4pm, 8pm, 9pm

Tuesday: 9am, 12midday, 1pm, 2pm, 3pm, 4pm, 8pm, 9pm, 10pm

Wednesday: 9am, 12midday, 1pm, 2pm, 3pm, 4pm, 8pm, 9pm, 10pm

Thursday: 9am, 12midday, 1pm, 2pm, 3pm, 4pm, 8pm, 9pm, 10pm

Friday: 9am, 12midday, 1pm, 2pm, 3pm, 4pm, 8pm, 9pm, 10pm

Saturday: 9am, 12 midday, 1pm, 2pm

Please let me know which time would suit you best (*and a 2nd preference time in case your first choice time is no longer available by the time we receive your email*).

For maximum privacy you might want to set up a <https://tutanota.com/> address (and email us from there to ocil@tutanota.com) or a www.protonmail.ch address (and email us from there to ocil@protonmail.ch). I'm reliably informed that Protonmail is about as private as email communications get.

Thanks again for your inquiry. I/we look forward to being of service to you!

Kind regards



Per: Patrick J. Flynn LL.B
Solicitor and Attorney at Law
Head Consultant
Tel: +852 30691620
Skype: kmentfly_alex
www.offshoreincorporate.com
info@offshorecompaniesinternational.com

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----- Original Message -----
From: Travis Sheppard <travis_sheppard@mac.com>
To: Offshore companies international <OCI@safe-mail.net>
Subject: Revisiting Cayman Incorporation & Next Steps
Date: Thu, 30 Oct 2025 20:47:08 +0100

Hi Patrick,

I hope you're doing well. We spoke earlier this year about setting up a Cayman Islands Exempt Company, but I hadn't moved forward with it at the time. Things have evolved since then, and I believe now may be the right moment to revisit that plan.

I'm currently building an AI startup focused on helping organizations adopt and integrate AI effectively into their daily operations. My co-founder and I are both based in Spain, but our customers and future investors will likely come from the U.S. and other global markets.

We recently met with U.S. legal counsel who recommended exploring a structure where:

- a **Cayman Islands holding company** owns the IP,
- a **Delaware C-Corp** serves as the U.S. operating entity, and
- a **Spanish company** handles EU operations and customers.

The primary goal is to protect and properly locate the IP while avoiding unnecessary worldwide taxation and staying compliant with both U.S. and EU requirements.

Given your background and our prior discussions, I wanted to ask if this type of multi-jurisdictional setup — particularly the Cayman formation and structuring side — is within your wheelhouse. If so, I'd love to set up a short call to walk you through what we're trying to accomplish and see how we might work together on this next phase.

Please let me know if you're available for a call sometime this week or next.

Best regards,

Travis Sheppard

 +1 214 235 2473

 Travis_sheppard@mac.com

From: Pat - Offshore Companies International
Sent: Monday, 24 February 2025 11:52 PM
To: Travis_sheppard@mac.com
Cc: Alexandra - Offshore Companies International
<alexandra@offshorecompaniesinternational.com>
Subject: RE: INTERNATIONAL CORPORATE STRUCTURING OPTIONS

Dear Travis,

RE: INTERNATIONAL CORPORATE STRUCTURING OPTIONS

Thank you for making the time to chat with me earlier today.

I note you are a US national (with a Spanish spouse) based in Spain and that you're looking into the viability of setting up a private, cost effective "Offshore" Corporate Structure to own/reinvest assets including Cryptocurrency Shares (and potentially ie down the track real property).

As promised, I'm writing to you today to set out some options for how I think your objectives might best be achieved from an "Offshore" perspective.

STRUCTURING CONSIDERATIONS

I note you are a citizen of the USA.

As the USA has (& Spain has, and Portugal has) a Controlled Foreign Corporation ("CFC") law (see attached which explains what CFC laws are), a nil tax Offshore Company or IBC by itself probably won't be of much use to you. (See Pdf files attached "Why set up a Foundation" & "Offshore Structuring Options for Residents of Countries with CFC laws" which explain why in more detail).

In summary, given what you have told me (thank you for your detailed information), if I were in your shoes, and knowing what I know, I would set up a dual structure, ie an Offshore or International Business Company ("IBC") and a Private Interest Foundation ("PIF").

Given you are a US resident, for maximum privacy, you might want to take a close look at these jurisdictions as none of them have signed a Tax Information Exchange Agreement with USA (see attached which explains what a TIEA is) and all charge no tax on profits realized outside the country of incorporation/registration):

For the Company:

- Nevis - For detailed information (including pricing info) see here: <http://offshoreincorporate.com/st-kitts-and-nevis-offshore-companies/>
- Seychelles - For detailed information (including pricing info) see attached & here: <http://offshoreincorporate.com/seychelles-offshore-companies/>
- Samoa - For detailed information (including pricing info) see attached
- The UAE (eg RAK) - For detailed information (including pricing info) see attached
- St Vincent - For detailed information (including pricing info) see attached
- The Cook Islands - For detailed information (including pricing info) see attached

Nevis also offers a low admin, asset protection focussed LLC product, see attached for details.

And for a/the Foundation:

- Seychelles - For detailed information (including pricing info) see attached & here: <http://offshoreincorporate.com/seychelles-foundations/>
- Belize - For detailed information (including pricing info) see attached
- Nevis - For detailed information (including pricing info) see attached.

If you want to cover your bases you might also want to avoid incorporating your Company that has a TIEA with Spain. See attached for details of what countries meet that criterion.

~~Note: although a Foundation should assist to minimize the chance of~~

~~Note. although a jurisdiction should assist to minimize the chances of the structure ever being taxed onshore, a Foundation alone will not suffice as foundations are designed as passive asset holding vehicles.~~

DUAL STRUCTURE - HOW IT WOULD WORK PRACTICALLY

In terms of how that would work structurally and practically:

- The shares of the Company would be held by the Foundation; and
- The beneficiaries of the Foundation would be whoever you nominate.

Commercially, the company would do the buying and selling, ie it would generate the income. Ideally, you would be appointed as Consultant or as an arms' length adviser to the Director of the Company with certain areas of responsibility. You might then be paid a commission (e.g.a percentage of business or sales introduced) or a retainer or a combination of the two.

As part of your brief you might also be given signing power on a bank account reporting/answerable to the Director. However that relationship is structured for legal reasons, it would need to be seen to be commercially realistic. The income you generate from this would be paid to you (or your local i.e. US company which, I imagine, would then pay a dividend to you) which would be assessable income at home for you. The remainder of the profit could be held (and/or reinvested) offshore potentially tax free.

Down the line (for maximum asset protection):

- The assets held by the Offshore Corp might be transferred to (and/or dividends might be paid to) the Company's shareholder i.e. the Foundation.
- The Foundation could then pay a distribution/s to all or any of its beneficiaries (who might include you/your family members).

I imagine you /your family members, i.e. the beneficiaries of the Foundation, would have to declare and pay taxes locally on any income or capital received from the Foundation (assuming such a receipt is taxable where the beneficiary lives). Having said that, I know a client, who set up one of these structures and then, ten years later, shifted his tax residence to a country that didn't have income tax whereupon he promptly drew down the capital from/of the structure, all of which was receipted/ banked tax free!

MANAGEMENT & CONTROL

Generally speaking an Offshore Company which is seen to be managed and controlled from Offshore can be taxed onshore.

Hence when setting up an Offshore Company, if you want to minimise the chances of the Company being taxed “onshore”, Management and Control of the Company will need to be, and be seen to be, taking place from Offshore. How that can be achieved is by deploying a Nominee Shareholder and or Nominee Director as part of the Corporate structure.

If you are also setting up a Foundation as part of the Corporate structure you will want to have the Foundation founded by a Nominee Founder (which service we can provide) which then assign its rights confidentially to you.

Again, for tax planning purposes, you will want the Foundation to be managed day to day by a nil tax jurisdiction resident Nominee Councillor (which service we can also provide). There are a number of features we can and will include to protect your ownership rights (which will prevent the Nominees from running away with your property or money). For more information on that and how the Nominee Services can work for you see attached brochures and please click on these links:

<http://offshoreincorporate.com/faq/should-i-engage-nominees-or-should-i-direct-and-hold-the-shares-in-my-offshore-company/>

<http://offshoreincorporate.com/faq/how-can-i-protect-my-underlying-ownership-of-my-offshore-company-where-a-nominee-is-engaged-to-act-as-director-or-shareholder/>

COST

As per our website cost for the set-up of such a structure would be as follows:

Company

- For a Nevis Company, including incorporation, registered/agent office service and one year's basic admin: \$1,200 (+ \$850 if a Nominee Director is required - which would be advisable for tax purposes). 2nd and subsequent years \$890 (+ Nominees if required)
- For a Samoan Company, including incorporation, registered/agent

- For a Caribbean Company, including incorporation, registered/agent office service and one year's basic admin: \$1,200 (+ \$850 if a Nominee Director is required - which would be advisable for tax purposes). 2nd and subsequent years \$1,090 (+ nominees if required)
- For a Seychelles Company, including incorporation, registered/agent office service and one year's basic admin: \$1,000 (+ \$850 if a Nominee Director is required - which would be advisable for tax purposes). 2nd and subsequent years \$765 (+ nominees if required)
- For an RAK Company including incorporation, registered/agent office service and one year's basic admin: \$2,350 (+ \$850 if a Nominee Director is required - which would be advisable for tax purposes). 2nd and subsequent years \$1800 (+ nominees if required)
- For a St Vincent company – see attached
- For a Cook Islands Company – see attached

Foundation

- For a Seychelles or Belize or Nevis Foundation, inc 1 year's basic admin + a Nominee Founder & Councillor (which would be advisable for tax purposes): \$2,900 (2nd and subsequent years \$1015 (+ \$850 if a nominee councillor is required)

For details of what's included in the set-up price (and in the annual fee from 2nd year) for a Company and for a Foundation see attached.

BANKING

We can assist you to set up an Offshore bank account, directly, at any of 23 different banks (and, via an agent, at an additional 30 banks) ranging from multi-national banking giants (eg HSBC, Standard Chartered, Barclays Bank etc) to Boutique Private (tax haven based) banks. Prices start from as little as \$750.

We can also assist you to open a Brokerage account for your Company, see attached which explains how.

Once you've decided where you want to incorporate (and how you want to structure) your Company I will ask you to complete and email me a Banking questionnaire (see sample attached). The answers therein will give me a snapshot of your banking requirements such as

should enable me to recommend a/the bank most likely to meet your needs. Meantime see the Brochures attached to my first email for details of banks with which we hold introducer relations presently (+ see also attached brochures which explain how to discreetly (a) move money to and (b) access monies banked by your Offshore Company.

WHERE TO FROM HERE?

In terms of timing to set up a Company takes anywhere from 24 hours to 3 weeks (depending on which jurisdiction you choose). To set up a Foundation takes around 2 weeks. The process of applying for a bank account will take anywhere from 12 weeks to 6 months + depending on which bank you choose, your line of business, what new requirements the bank has introduced since your company was formed, your background, the level of experience of the banker managing your application, how many questions the bank asks, the kind of questions the bank asks and how you respond to those queries etc etc etc.

To move forward you will need to:

1. Complete and sign and email me order forms (1 per entity required, see attached + guides which explain how to complete the order forms)
2. Email me certified copies of your/the Foundation beneficiaries' passport/s and proof of address document/s as per our requirements (see Pdf file attached).

If you've any further questions I suggest as a next step we convene a video or phone conference at a time convenient to you. I work odd hours to fit in with my international clientele (I'm online 17 hours a day). Hence no problem to confer at a time convenient to you.

Assuming we're good to move forward *what name would you like for your Company* (If you like I can make a no cost/obligation inquiry with the respective registries to determine whether your preferred names are available)???

Thanks again for your inquiry!

Kind regards

Per: Patrick J. Flynn LL.B
Solicitor and Attorney at Law
Head Consultant
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www.offshoreincorporate.com
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From: Pat - Offshore Companies International
Sent: Tuesday, 18 February 2025 1:33 AM
To: Travis_sheppard@mac.com
Subject: ?

Hi,

Am just checking you received my below 2 emails.

Each had a number of attachments and am concerned either or both mails may have landed in your junkmail box (or worse).

WHY CHOOSE OCI?

- 1. Superior Quality:** All products are cross checked by a professionally qualified manager before they leave our office
- 2. Consistently Speedy Service:** We have a monitored joblog which automatically alerts management to marshal the resources required to ensure service is delivered on time
- 3. Minimise Costs & Maximise Privacy:** Our CEO (an Internationally Qualified Corporate/Tax Lawyer) spent ten years on the ground in a major International Offshore Financial Centre from 2001-2011 helping to draft product laws which means we offer unparalleled knowledge of how to structure and manage your Offshore Entity for maximum financial gain!
- 4. Eliminate Headaches:** Setting up Offshore is fraught with risk. If you go about it the wrong way the penalties can be severe. We have

you go about it the wrong way the penalties can be severe. We have the technical knowledge and industry experience to minimise the chances of you ever falling foul of onshore law

5. Wider Range of Services: With an Internationally qualified lawyer and Chartered Accountant as part of our service team we can offer the widest range of services imaginable in this market.

6. Greater Choice of Banks: Because our Executive team have been in the “Offshore” business for a long time (and have LOTS of contacts) we can offer you a much wider choice of banks than any of our competitors!

7. Value for Money: OCI is a high quality operation but we’ve deliberately pitched our prices significantly lower than the other quality operators. This means you get unbeatable value for money. And you can contact us anytime for free during the lifetime of the Company for advice on how to structure, operate or manage your Company.

For maximum privacy, and to ensure that I don’t miss any of your emails, (or you, mine) you might want to set up a www.hushmail.com address (and email us from there to ociceo@hushmail.com) or a www.safe-mail.net address (and email us from there to oci@safe-mail.net) or a <https://tutanota.com/> address (and email us from there to ocil@tutanota.com) or a www.protonmail.ch address (and email us from there to ocil@protonmail.ch). I’m reliably informed that Protonmail is about as private as email communications get.

Kind regards

Per: Patrick J. Flynn LL.B
Solicitor and Attorney at Law
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From: Pat - Offshore Companies International
Sent: Tuesday, 18 February 2025 1:31 AM
To: Travis_sheppard@mac.com
Cc: Alexandra - Offshore Companies International
[<alexandra@offshorecompaniesinternational.com>](mailto:alexandra@offshorecompaniesinternational.com)
Subject: DD

Dear Travis,

Further to my below email, to assist you with your due diligence process as regards my/my firm's credentials, please find attached:

1. Six Testimonials
2. A copy of OCI's Corporate docs
3. A copy of OCI's current HK business license
4. A copy of my Lawyer qualification papers and most recent law license/s
5. A copy of our Belize & Seychelles CSP sublicense agreements (FYI we hold such a license in each of the jurisdictions where we incorporate Companies/Trusts/Foundations)
6. A copy of our succession plan
7. OCI Executive Team Profiles
8. Details of OCI Professional Referees (feel free to contact these firms' direct) + our most recent Testimonial received

In particular you should contact these 6 Law firms as we have done a lot of Crypto/Blockchain/DAO related set ups for them:

Crypto Law Group Pty Ltd: <https://cryptolawgroup.com.au/>

Cadena Legal: <https://www.cadenalegal.com.au/>

L&Y Law Group: <http://www.lylawoffice.com/>

The Chain Project: <https://www.linkedin.com/company/the-chain-project/>

Startup Tru: <https://www.startuptru.com/>

The Reflexical Group: <https://reflexical.com/>

You can also read reviews here: <http://offshoreincorporate.com/why-choose-oci/client-testimonials/>

You can also find me on Linked In: <https://www.linkedin.com/in/patrick-flynn-43977046/>

There was also a defamatory article published in an online publication. We are currently taking legal action as regards same. To cut to the chase we got scammed by a professional. See attached "The Pett P&P Story" which explains in full what happened.

Kind regards

Per: Patrick J. Flynn LL.B
Solicitor and Attorney at Law
Head Consultant
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Skype: kmentfly_alex
www.offshoreincorporate.com
info@offshorecompaniesinternational.com

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From: Pat - Offshore Companies International
Sent: Tuesday, 18 February 2025 1:29 AM
To: Travis_sheppard@mac.com
Cc: Alexandra - Offshore Companies International
[<alexandra@offshorecompaniesinternational.com>](mailto:alexandra@offshorecompaniesinternational.com)
Subject: YOUR INQUIRY OF OCI LTD

Dear Travis,

Thank you for your inquiry.

Certainly OCI can help you set up/administer an Offshore company in the Cayman Islands (or elsewhere as you may decide) and bank account.

Moreover we can assist you to design and construct a bespoke

Moreover we can assist you to design and construct a bespoke Offshore Corporate structure to facilitate your privacy, investment, financial, succession planning and/or asset protection objectives as/if applicable.

See below for details (and beneath the paragraph headed “**Your Questions Answered**” for detailed answers to your specific questions).

Who is OCI?

Offshore Companies International (“OCI”) is a market innovator in the delivery of Offshore Company/Trust/Foundation Formation, Financial Privacy and Asset Protection Solutions.

With increased focus on the use of so called “Tax Havens” (and with the majority of Offshore Company retailers offering a *one-size-fits-all* “cookie cutter” style approach to IBC Formation) OCI aims to fill the void of quality providers on the net. We deliver *individually tailored* Offshore Corporate Structuring Solutions designed to maximize financial privacy and minimize the chances of ownership of your Offshore assets ever being discovered (or attacked)!

We’ve created cutting edge service delivery systems which guarantee that you receive prompt high quality service every time:

- All products/documents are cross checked by a professionally qualified manager before they leave our office +
- We have a monitored joblog which automatically alerts management to marshal the resources required to ensure service is delivered on time +
- For every possible job which could come in there is a Checklist explaining (a) how to do the job and (b) which templates to use - which enables us to produce quality service *consistently* +
- All written communications with clients are via a secure email account system so your privacy is assured +
- Our client data is protected by military grade encryption (40% of this business is owned by an extremely successful Dotcom entrepreneur which gives us access to the best IT security systems money can buy) +
- All our service staff are University qualified degree holding professionals and are extensively trained to answer clients’ inquiries promptly and using easy to understand language +
- Our CEO (a Qualified Lawyer since 1991) spent ten years on the



ground in a major International Offshore Financial Centre from 2001-2011 helping to draft product laws which means we offer unparalleled knowledge of how to structure **and** manage an Offshore Entity to best meet your particular needs!

We can help you from A to Z including with guidance on where to incorporate/how to structure your Company, how to administer your company for maximum financial gain, and how to utilize funds banked offshore. For more information on who we are and how we can help you please visit these pages from our website:

<http://offshoreincorporate.com/why-choose-oci/who-we-are/>

<http://offshoreincorporate.com/the-oci-difference/>

<http://offshoreincorporate.com/why-we-started-this-business/>

How Can We Help You?

The first thing you'll need to decide is *where to set up* your Offshore Company (and then how to structure the entity). This depends on a number of things including where you live, where your clients are based, typical client profile and more.

The good news is we also offer free structuring advice as part of our incorporation service. To be able to so advise you we would need to conduct a review of your current position.

One size doesn't fit all. If you'd like us to recommend a structure/jurisdiction best suited to meet your particular needs please answer these questions:

- Where are you currently resident for tax purposes ie *where are you required by law to report income/pay tax* (ie what country)?
- What kind of business will your proposed Offshore Company own/operate?
- Where will your prospective customers and suppliers/staff be based (ie what countries)?
- What asset/s (if any) is your proposed Offshore entity to own? Where are those assets located (ie in what country)?
- If this company is being to set up to hold shares in/receive dividends from an onshore Company – what country is that company incorporated/registered in?
- Why do you want to set up a Company and/or Trust &/or Foundation Offshore (eg for tax minimisation? Or for asset protection? Or for access to a wider range of investments? Or for greater freedom to trade? Or for succession planning? etc)?

- How much have you budgeted to spend on your International Corporate structure?
- When do you want to/need to get this set up by?
- Do you think it will be a problem to/for your customers or suppliers to pay or deal with a “known tax haven” company? (In which case a more sophisticated jurisdiction might be preferred eg a Hong Kong Corp or Estonia Corp or etc, see below discreet jurisdiction options)

Prices range from \$1,000 (from 2nd year \$690) ie for a self-managed Belize IBC, to \$3,500 (from 2nd year \$1,990) ie for a Full Nominee Hong Kong Company. For details of Company jurisdictions offered (+pricing info) please click on this link:

<http://offshoreincorporate.com/products-services/offshore-companies/>

Caymans Company Formations

In the Caymans we can set up Exempt Companies and Foundation companies limited both by share capital and by guarantee. We also set up local Companies.

I note your preference currently would be to set up up a Caymans Exempt Company

Re cost on incorporation Foundation Companies generally run about USD\$5,600 and Exempt companies generally cost about USD\$3,150.00. The fee may vary based on share capital of company, the Government levies tiered fees for share capital.

To set up a Caymans Exempt Company (assuming standard authorised share capital) costs \$US3,271.50 (see attached “Incorp Package standard-inclusions” for details of what’s included in that price). We can also supply a Nominee director for a fee of \$900 p/a.

- Annual Fees are outlined below:
 - Annual Registered office fees- 925
 - Government filing fee (depending on share capital) 1100.00 (approximately)
 - Economic substance filing- USD\$335.00
 - Beneficial Ownership Filing -USD\$275

Re time frame to set up each model of Company- There are two services available (1) the standard incorporation which is approximately 2-3 weeks (2) An expedited service which takes

approximately 7-10 days (with respect to the latter, a fee of \$500.00 is levied by the CI Government for this service).

For more details see attached “Caymans Exempt Companies fact sheet” .

Offshore Incorporation Alternatives?

The Compliance levels in Caymans are amongst the heaviest (if not THE Heaviest) of all the Offshore Jurisdictions.

If ease of set up/maintenance and/or ownership privacy are priorities and/or if you're on a budget you might want to think about incorporating your Company in a Privacy Haven ie somewhere which (i) does NOT have a public register of directors, shareholders or owners & (ii) which does not require any local presence. Most people in that position choose to incorporate in either:

- Nevis – For detailed information click on this link: <http://offshoreincorporate.com/st-kitts-and-nevis-offshore-companies/>; or
- Seychelles – For detailed information see attached & click on this link: <http://offshoreincorporate.com/seychelles-offshore-companies/>; or
- The BVI – For detailed information see attached & click on this link: <https://offshoreincorporate.com/products-services/offshore-companies/bvi-tax-free-ibcs/>

Cost there would be:

- For a Nevis Company, including incorporation, registered/agent office service and one year's basic admin: \$1,400. 2nd and subsequent years \$1,350
- For a Seychelles Company, including incorporation, registered/agent office service and one year's basic admin: \$720 2nd and subsequent years \$575
- For a BVI Company, including incorporation, registered/agent office service and one year's basic admin: \$1,250. 2nd and subsequent years \$1,100

Nevis also offers an (Asset Protection focussed) LLC product. See attached for details.

~~Other low cost/low maintenance/private/potentially nil tax jurisdictions~~

Other low cost/low maintenance/privacy/potentially tax jurisdictions worth considering include:

1. Panama: For detailed information (including pricing info) see attached + this link: <https://offshoreincorporate.com/panama-offshore-companies/>
2. Samoa: For detailed information (including pricing info) see attached
3. St Vincent: For detailed information (including pricing info) see attached
4. The Marshall Islands: For detailed information (including pricing info) see attached

These prices as quoted are our usual retail prices. **But if you confirm an order and pay within 48 hours of us sending this email we can gift you 10% off the usual price!**

Discreet Offshore Company Jurisdictions

You may be interested to know that the most popular place to incorporate a (potentially) tax-free Offshore Company is Hong Kong. See attached *Why Incorporate in Hong Kong* which explains why it's so popular.

If you want to do business discreetly but still reap the benefits of Offshore Incorporation you might want to take a close look at setting up an Estonian Company, or a Scottish LP or an English LP or a UK LLP (see attached for details – these are particularly useful if you plan to do business in the EU) or a United Arab Emirates Company (eg an RAK Corp) or a Singapore Corp (see attached for details).

For information on what's included in set-up fee and in the annual fee from 2nd year see attached *Incorp Package Standard Inclusions & What do you get for your annual renewal fee EU user*.

Corporate Structure

If you want to minimize the chances of regulatory interference you might want to incorporate your company in a jurisdiction which does not have a TIEA (Tax Information Exchange Agreement) with your home state/country (See attached which explains what a TIEA is).

For maximum privacy and/or if your aim is also to minimise the chances of your Offshore Company being taxed onshore (as a Company which is seen to be managed and controlled from onshore

can be taxed onshore) you might want to include a Nominee Director/Shareholder as part of the Corporate Structure. OCI can arrange this service for you - for information on how/why that might work for you (and for guidance on whether to select Nominee Services or not) please read these pages:

<http://offshoreincorporate.com/faq/should-i-engage-nominees-or-should-i-direct-and-hold-the-shares-in-my-offshore-company/>

<http://offshoreincorporate.com/faq/how-can-i-protect-my-underlying-ownership-of-my-offshore-company-where-a-nominee-is-engaged-to-act-as-director-or-shareholder/>

Additionally if you live in a country which has CFC laws (see attached which explains what CFC laws are & note both the US and Portugal have CFC laws) and/or if you don't want to be classified at law as the "beneficial owner" of your Offshore Company (or its Bank Account) you might want to include a Foundation as part of the Corporate structure. See attached "Why set up a Foundation" for details. (We can assist to set up a Foundation in Seychelles, Panama, Bahamas, Belize, Nevis, the Cook Islands and more. Prices start from \$1,900).

Banking

We can assist you to set up an Offshore bank account, directly, at any of 23 different banks (and, via an agent, at an additional 31 banks) ranging from multi-national banking giants (eg HSBC, Standard Chartered, Barclays Bank etc) to Boutique Private (nil tax jurisdiction domiciled) banks. Prices start from as little as \$750.

Once you've decided where you want to incorporate (and how you wish to structure) your Offshore Company and once we know more about your specific banking requirements - we'll will help you identify a/the bank (or banks) most likely to meet your particular needs. Meantime see attached Brochures for details of banks where we can open accounts presently.

We can also help you set up a merchant account facility with a wide range of providers such as will enable your customers/clients to pay you via card online.

Your Questions Answered

I am interested in setting up a Cayman Islands Exempted Company to

manage investments, including cryptocurrency holdings and real estate. Noted. Offshore Companies are widely used for such purposes. Check the attached brochures which explain how/why ie these files:

- How to use an Offshore Company to invest in cryptocurrencies
- How to use an IBC to trade cryptocurrencies
- How to bring home Cryptocurrency trading profits
- How to transfer of cryptocurrency to an offshore company
- How to realise cryptocurrency gains offshore almost tax free
- How to use an IBC to trade real estate
- How to use an IBC to invest in real estate

My wife and I are in the process to be tax residents in Portugal under the Non-Habitual Residency (NHR) program, and we are looking for a tax-efficient structure that aligns with our long-term financial planning. Key Requirements for the Company:

- Ownership Structure: My wife (a Spanish citizen) will hold 51%, and I (a U.S. citizen) will hold 49%. That is easily achievable eg by setting up a Company limited by shares
- Business Activities: The company will hold and manage assets, including crypto investments and real estate properties. That is easily achievable, see above/attached
- Tax Efficiency: We want to ensure that capital gains on crypto and real estate transactions remain tax-efficient under Cayman, U.S., and Portuguese tax laws. If you structure (and most importantly if you administer) your Offshore Company in a particular way profits/gains generated by your Offshore Company can be generated/banked in a nil tax environment leaving you potentially with a result whereby you should only have to declare/pay tax on any "income: received by you personally from the Offshore Entity/structure"
- Banking & Compliance: Assistance with opening a corporate bank account and crypto-friendly banking solutions. Bank Account opening assistance is part of our service and (as I trade crypto myself) we can share Intel with you on how to onramp/offramp crypto without upsetting your Company's bankers
- Legal & Reporting Requirements: Guidance on Cayman Islands compliance obligations and any necessary U.S. reporting (e.g., Form 5471, FBAR, FATCA compliance). We can assist with providing guidance on your Compliance requirements in the Caymans

I would appreciate an overview of your services, pricing, and estimated timeline for setting up the company (see all that info above), as well as recommendations on the most efficient structure based on my

circumstances. In my view (23 years + experience as a Specialist International Tax Planning Lawyer) the most efficient structure for your circs would be to set up a nil tax Company with a (nil tax jurisdiction based) "Nominee" director + a Private Foundation (ie to act as owner/shareholder of the Company).

Next Steps

To set up a Company with OCI all you need to do is (a) complete, sign and email us an order form (see attached + a guide which explains how to complete the order form) and (b) email us proof of your ID and residence (as per our requirements – see Pdf file attached). Payment can be made by bank/wire transfer, or by Credit/Debit Card or via Paypal account or via Bitcoin. (When you confirm an order please also tell us how you would like to pay).

Do you speak ok English? If so, it would be good, as a next step, to convene a phone or video conference.

I've been a qualified Lawyer for 33 years+ and for the last 23 years+ I've specialized exclusively in International Corporate Structuring. I'm also former owner of the biggest Trust Company in Seychelles where my then partner drafted and I vetted (as head of the Practitioner's Association's Legislative Review Committee) a bunch of "Offshore" Industry laws including the Limited Partnerships Act, Protected Cell Companies Act, International Corporate Service Providers Act, a new IBC Act, a new Trusts Act, Mutual Fund Act, Securities Act, Foundations Act and more. I have a LOT of knowledge which I'd be happy to share with you...

My days tend to be booked out 24 hours ahead and thus I can be hard to catch randomly on skype or by phone. If you want to chat/confer with me your best bet would be to set up a conference time.

Presently I can offer you the following conference times (all at + 8 GMT which is the same timezone as Beijing/Shanghai, 4 hours ahead of the UAE, 2.5 hours ahead of Delhi India, 6 hours ahead of Joburg, 7 hours ahead of UK, 6 hours ahead of Central European time, and 12 hours ahead of New York/Toronto time):

Week commencing 16 February:

Tuesday: 11am, 12 midday, 2pm, 3pm, 4pm, 8pm, 9pm, 10pm

Wednesday: 9am, 11am, 12 midday, 2pm, 3pm, 4pm, 8pm, 9pm, 10pm

Thursday: 9am, 11am, 12 midday, 2pm, 3pm, 4pm, 8pm, 9pm, 10pm

Monday: 9am, 11am, 12 midday, 2pm, 3pm, 4pm, 9pm, 10pm

Friday: 9am, 11am, 12 midday, 2pm, 3pm, 4pm, 9pm, 10pm

Saturday: 11am, 12 midday, 2pm

Please let me know which date and time suits you (+ your contact details) and assuming that time is still available, I will book you into my diary.

Meantime you might also want to check out the FAQs, Why Go Offshore, Common Offshore Corporate Strategies and Blog sections of our site as there's heaps of useful info and articles there. They can be accessed via these links:

<http://offshoreincorporate.com/faq/why-set-up-an-ibc/>

<http://offshoreincorporate.com/how-to-use-an-offshore-company-the-classic-example/>

<http://offshoreincorporate.com/why-set-up-offshore/3-key-reasons/>

<http://offshoreincorporate.com/common-offshore-corporate-strategies/>

<http://offshoreincorporate.com/blog/>

<http://offshoreincorporate.com/why-set-up-offshore/faqs-4/>

Thank you again for your inquiry.

Kind regards

Per: Patrick J. Flynn LL.B
Solicitor and Attorney at Law

Head Consultant

Tel: +852 30691620

Skype: kmentfly_alex

www.offshoreincorporate.com

info@offshorecompaniesinternational.com

DISCLAIMER: OCI is a Company/Trust/LLC/LP/Foundation Formation Agency. We are not

tax advisers or legal advisers. You are advised to seek local legal/tax/financial advice in regards to your local reporting/tax requirements before committing to set up or use an Offshore Company or other entity.

The contents of this e-mail are confidential and are intended only for the named recipient. The material may be subject to legal professional privilege. If the reader is not the intended recipient, any use, reproduction, disclosure, distribution, dissemination, printing, or copying of the information contained in the e-mail or any file attachments is prohibited. If you have received this e-mail in error, please reply to the sender immediately and delete the document. Any loss/damage incurred by using this material is not the sender's responsibility. The sender's entire liability is limited to re-supplying the material. No warranty is made that this material is free from computer virus or other defect. Any structuring suggestions stated herein are generic examples only, should not be relied upon, are not and should not be construed as legal or financial advice and may be varied by local circumstances. You are advised to seek local legal and financial advice about the potential tax and or reporting implications in your home state regarding, and before you commit to establish, any International ie non-local Corporate, Trust or Foundation structure (or offshore bank account).

Sent with [Proton Mail](#) secure email.

On Tuesday, 18 February 2025 at 00:44, WordPress <info@offshorecompaniesinternational.com> wrote:

contact from offshore site:

=====

Name:

Travis Sheppard

Email:

Travis_sheppard@mac.com

Subject

Assistance with Setting Up a Cayman Islands Exempted Company

Message

Dear Offshore Incorporate team,

I am interested in setting up a Cayman Islands Exempted Company to manage investments, including cryptocurrency holdings and real estate. My wife and I are in the process to be tax residents in Portugal under the Non-Habitual Residency (NHR) program, and we are looking for a tax-efficient structure that aligns with our long-term financial planning.

Key Requirements for the Company:

- Ownership Structure: My wife (a Spanish citizen) will hold 51%, and I (a U.S. citizen) will hold 49%.
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- Tax Efficiency: We want to ensure that capital gains on crypto and real estate transactions remain tax-efficient under Cayman, U.S., and Portuguese tax laws.
- Banking & Compliance: Assistance with opening a corporate bank account and crypto-friendly banking solutions.
- Legal & Reporting Requirements: Guidance on Cayman Islands compliance obligations and any necessary U.S. reporting (e.g., Form 5471, FBAR, FATCA compliance).

I would appreciate an overview of your services, pricing, and estimated timeline for setting up the company, as well as recommendations on the most efficient structure based on my circumstances.

Please let me know a convenient time for an initial discussion for you or one of your associates. I look forward to hearing from you.

Best regards,

Travis Sheppard

WhatsApp: +1.214.235.2473