



The Sixth Annual
**OFFSHORE
INSTITUTE**
2001 Conference

NOVEMBER 11-13, 2001
HOTEL INTER-CONTINENTAL
MONTREAL, QUEBEC, CANADA



Independent Delegates and Guests Welcome

SPONSOR



Cook Islands Trust & Banking Corporation Ltd

CITBC and its executives are internationally recognized as world leaders in asset protection and wealth preservation structures. Traditional English common law combined with modern and innovative legislation authored by members of our executive team, provides a unique and comprehensive set of protective law which:

- Sets firm time limits for actions against trust assets
- Requires proof of intent to a criminal standard in allegations of fraud
- Quarantines trust assets from foreign court decrees
- Safeguards client information in interlocutory proceedings

Exhibitor



The Nevis Financial Services Department

Seventeen years since the launch of the Nevis international financial services sector, unlike many jurisdictions, Nevis is neither a dependency nor a crown colony but rather an independent country. Nevis has four attractive pieces of legislation — The Nevis Business Corporation Ordinance, 1984; The Nevis International Exempt Trust Ordinance, 1994; The Nevis Limited Liability Company Ordinance, 1995; and the Nevis Offshore Banking Ordinance, 1996. Nevis is recognized in the international arena as a flourishing, mature and modern international financial services centre firmly anchored on the island's stability, financial integrity, well-planned modern legislation and the implementation of protective regulations.

This two-day conference is a unique opportunity for updating key professional skills

— while networking with leading practitioners, colleagues and users of services.

The Offshore Institute's Sixth Annual Conference 2001 provides a wealth of up-to-date information presented by an internationally-known panel of experts.

- Learn of recent Caribbean developments and their global ripple effect.
- Benefit from learning the latest worldwide asset protection planning developments.
- Understand management of both money and risks from a global basis.
- Examine Qualified Intermediary Regulations as a new form of extra-territorial jurisdiction.
- Learn of recent developments in anti-money laundering laws.
- Analyze using residence, citizenship and domicile for individual tax plans.
- Understand extra-territorial jurisdiction as exercised by U.S. courts.
- Determine current trends in wealth management and opportunities in the family office concept.
- Learn about tax plans for doing business in Asia.
- Hear the experts' reactions to the O.E.C.D. anti-offshore campaign and its offshore impact.
- Examine the current developments in European and international financial centers.
- Review the migration of trusts and learn why redomiciliation is not what it used to be.

About the Offshore Institute:



The Offshore Institute was founded in 1989 and has members from over 55 territories and countries. It was and remains the offshore industry's first and only multi-disciplinary international professional body and provides its members and affiliates with a unique international educational and networking capability. The Institute's primary role is educational, being devoted to the study of offshore finance, international business and private wealth preservation planning. For further information, please fax the office of Samuel M. Lohman, President of the Offshore Institute, at 41 22 317 8030.

CONFERENCE AGENDA

Sunday, November 11, 2001

6:30 - 8:00 *Registration and Cocktail Reception*
Sponsored by Cook Islands Trust and Banking Corp. Ltd

Monday, November 12, 2001

8:00 - 9:00 *Registration Continues; Continental Breakfast*

9:00 - 9:15 *Samuel M. Lohman, Morning Chairperson;*
President, The Offshore Institute; Switzerland

Welcome and Opening Remarks

9:15 - 10:00 *Edmund L. Bendelow; President Emeritus, The Offshore*
Institute; Jersey, Channel Islands

**Current Developments in European and International
Financial Centers**

10:00 - 10:45 *Alexander Odishelidze; Caribbean Branch Chair and South*
American Liaison, The Offshore Institute

**Coming Caribbean Developments and Their Ripple Effect:
Impact on U.S. Possessions and Globally of the Impending
Death of Code Section 936; Ripple Effect of the Coming
Change in Political Status for Puerto Rico**

10:45 - 11:00 *Morning Coffee*

11:00 - 11:45 *Barry S. Engel, President Emeritus, The Offshore Institute; U.S.*

**A Survey of Developments Worldwide in Matters Relating
to Asset Protection Planning**

11:45 - 12:30 *David S. Lesperance, Canada*

**Using Residence, Citizenship and Domicile for Individual
Tax Plans**

12:30 - 2:00 *Conference Luncheon*

2:00 - 2:05 *Barry S. Engel, Afternoon Chair; President Emeritus,*
The Offshore Institute; U.S.

Introduction to Afternoon Session

2:05 - 2:45 *Samuel M. Lohman President, The Offshore Institute;*
Switzerland

**The Long Arm of the U.S. Treasury Department:
Qualified Intermediary Regulations as a New Form of
Extra-Territorial Jurisdiction; Survey of Developments in
Anti-Money Laundering Law Worldwide**

2:45 - 3:30 *Reuben Tylor, Cook Islands*

**Migration of Trusts: Redomiciliation Is Not What It
Used to Be**

3:30 - 3:45 *Afternoon Tea*

3:45 - 4:30 *Andrew Hall, U.K.*

**Private Banking and Money Management — An Essential
Link in the Offshore Planning Chain**

4:30 - 4:45 *Day's Faculty*

Panel Discussion; Q&A

4:45 - 5:30

**Annual General Meeting of The Offshore Institute
(open to membership only)**

7:00 - 8:00 *Cocktails — Cash Bar*

8:00 - 10:00 *Conference Dinner*

Tuesday, November 13, 2001

8:00 - 9:00 *Continental Breakfast*

9:00 - 9:15 *Edmund L. Bendelow, Morning Chairperson;*
President Emeritus, The Offshore Institute; Jersey

**Review of Monday's Topics and Introduction to
Today's Topics**

9:15 - 10:00 *David Chong, Singapore*

Tax Plans for Doing Business in Asia

10:00 - 10:45 *E. Jerry James, Deputy President, The Offshore Institute; U.S.*

**Trends in Wealth Management; Opportunities Through the
Worldwide Spread of the Family Office Concept**

10:45 - 11:00 *Morning Coffee*

11:00 - 11:45 *Barry S. Engel, U.S.*

**Extra-Territorial Jurisdiction as Exercised by U.S. Courts;
Tools Used in International Litigation Against Trusts**

11:45 - 12:30 *Walter Diamond, Vice President, The Offshore Institute; U.S.*

New Strategies in a Restricted Offshore World

12:30 - 2:00 *Conference Luncheon*

2:00 - 2:10 *E. Jerry James, Afternoon Chair; Deputy President,*
The Offshore Institute; U.S.

Introduction to Afternoon Session

2:10 - 3:15 *Edmund L. Bendelow, David Chong, Barry S. Engel,*
Samuel M. Lohman, Reuben Tylor

**Panel Discussion on the History and Current Status of the
O.E.C.D.'s (Organization for Economic Cooperation and
Development) Anti-Offshore Campaign of Terror; Meaning
and Impact on the Offshore Industry**

3:15 - 3:30 *Afternoon Tea*

3:30 - 4:15 *E. Jerry James, Deputy President, The Offshore Institute; U.S.*

**Offshore Planning Opportunities by Way of the Family
Office: Strategic Practice Expansion, Leveraging Fees,
Solidifying Relationships and Refining Alliances**

4:15 - 5:00 *Samuel M. Lohman, Switzerland*

Anti-Money Laundering Traps for the Wary and the Unwary

5:00 - 5:30 *Day's Faculty*

Panel Discussion; Q&A

5:30 *Samuel M. Lohman, Switzerland*

Close of Conference

*Please Note: The designated speakers, the content, and the time periods, are
subject to change as circumstances may require.*

Barry S. Engel is President Emeritus, Americas Branch Chair, and a Fellow of the Isle of Man-based Offshore Institute. Mr. Engel is the lead author of the *Asset Protection Planning Guide: A State-of-the-Art Approach to Integrated Estate Planning*, published by CCH Incorporated, Chicago, Illinois. Among his many appointments are Consulting Editor of *Shore To Shore*, the official publication of The Offshore Institute; the Editorial Board of London-based *Trusts & Trustees*; Consulting Editor of the *International Offshore and Financial Centres Handbook*; and Consulting Editor of *The Offshore Institute Membership Directory & Analysis* for the 1996/97, 1997/98, 1998/99 and 1999/00 editions. Mr. Engel has acted as a consultant to a number of offshore jurisdictions and was a co-author of the asset protection trust law as enacted by the Parliament of the Cook Islands in 1989. Mr. Engel is the Senior Global Correspondent for the acclaimed online publication *Offshore Today* and is the designated specialist for the professional section on asset protection planning for *FindLaw*. He is affiliated with *WealthPort, Inc.*, a premier e-business providing technology solutions and e-strategy development for the financial services industry. Mr. Engel is also a Senior Fellow of The Estate and Wealth Strategies Institute at Michigan State University and a Fellow of the National Network of Estate Planning Attorneys. He is a principal in Colorado-based Engel Reiman & Lockwood pc. In September of 1998, he was presented with the Excellence in Education Award by Professional Education Systems, Inc. — a distinction bestowed on less than 2% of the 1,000+ speakers PESI works with each year.

David S. Lesperance, Barrister and Solicitor, is Legal Counsel to Global Relocation Consultants, SA. Since being called to the Bar in Ontario, Mr. Lesperance has been practicing exclusively in immigration and citizenship law, and has developed a particular expertise in assisting individuals who are acquiring residency or citizenship to fulfill tax or estate planning objectives. This may involve moving to high tax countries on a low tax basis; acquiring residency in various tax havens; and/or acquiring legal “instant citizenship.” Mr. Lesperance’s specialization includes immigration and citizenship issues, offshore trusts and tax planning issues, and the introduction of clients to banking, accounting and other professionals. He has spoken and authored numerous articles on offshore strategies to deal with U.S. tax liabilities and U.S. expatriation. He is a contributing author for *International Living* and member of the advisory board of the Sovereign Society.

Walter H. Diamond, Editor and Chief Economist, Overseas Press and Consultants and United Nations Tax Treaty and Free Trade Zone advisor, is a recognized international tax authority, having been involved with offshore jurisdictions for more than half a century. Mr. Diamond is a well-known author of 76 foreign tax and trade books with his trade journalist wife, Dorothy, including *Tax Havens of the World*. He has written a column of foreign credit for *The Financial Times* for more than 20 years and is on the advisory boards of several publications. A former Director of International Taxation for Deloitte Touche and Manager of International Taxes for KPMG Peat Marwick, Mr. Diamond assisted Peter Redmond in the founding of the Offshore Institute in 1989 and has served as Senior Vice President since its creation. Both he and his wife are Professors of Law and International Taxation for the St. Thomas University College of Law and International Tax Program on the Internet. Having been a National Bank Examiner in charge of liquidation of certain Japanese, German and Italian banks in the early part of World War II, and later Foreign Analyst for the Federal Reserve Bank of New York, Mr. Diamond now serves as a Director and Consultant to the First Colorado Depository Corp. He is a Contributing Editor for *Offshore Investment* magazine and a columnist for *Shoreliner*, the Offshore Institute’s official journal.

Edmund (Ben) Bendelow is Deputy Chairman of the Basel Trust Corporation Group and is a specialist in international estate planning for the high-net-worth individual. His clients include high-net-worth individuals, private and public corporations, international financial institutions and governments. He is particularly interested in estate planning for multi-resident individuals and in the developing role of e-commerce in the international business world. Mr. Bendelow frequently writes and lectures. He serves as a nonexecutive director on the boards of a number of subsidiaries of publicly quoted corporations. As well as his financial services business interests, Mr. Bendelow has extensive commercial interests in information technology, international consulting and professional service firms. Among other positions, he is President Emeritus, Executive Committee Member and Chairman of the European Branch of the Offshore Institute, as well as a member of several other professional bodies. Mr. Bendelow serves on the Editorial Advisory Board of *Offshore Finance U.S.A.*, and has also had articles published in *Offshore Investment*, *Shore to Shore*, *Offshore Finance Year Book* and many other professional publications. He received his BSc from the University of Wales and his MBA from the University of Exeter.

Samuel M. Lohman is an international lawyer specializing in servicing the needs of governments, individuals, private/public corporations, banks, fiduciaries and other professional providers. His law firm is in Geneva, Switzerland. His particular areas of emphasis are international estate/commercial planning, anti-money laundering compliance (government and private-sector education and legal advice), mutual legal assistance as well as collateral legal matters related to the international financial service sector/industry. He frequently writes and lectures, and has served as appointed expert in the areas of anti-money laundering, banking secrecy and bankruptcy in a transnational context. In 1998 he designed and chaired the “First Caribbean Anti-Money Laundering Symposium,” a three-day event co-sponsored by the government of the British Virgin Islands and the H. Lavity Stoutt Community College, which led to a certificate in anti-money laundering compliance for the professional providers who attended. In the same year he lectured in Israel to about 100 Israeli government jurists and lawyers at the invitation of the attorney general of Israel and the Israeli Ministry of Justice. Among other positions, he is an Adjunct Professor at the Instituto de Empressa, President and Executive Committee member of the Offshore Institute, and maintains memberships in the Oregon, American and International bar associations as well as registration with the Geneva Bar Association as a foreign lawyer authorized to carry out the practice of law.

Reuben Tylor is an international lawyer with particular expertise in trust law. He is a principal of Cook Islands Trust & Banking Corporation, Ltd. Mr. Tylor is best known for promoting and co-authoring the first asset protection legislation in the Cook Islands in 1989. He continues to play an important part in the development of the Cook Islands financial centre. Mr. Tylor graduated as a lawyer from Auckland University, New Zealand, and has practiced in both the New Zealand and Cook Islands courts. He is a member of The Offshore Institute and the International Tax Planners Association. He has published numerous articles on trust law, asset protection and the Cook Islands financial centre, and speaks frequently on these subjects at international legal conferences.

Andrew Hall is qualified as a banker and served as an investment manager for Barclays Bank, before spending 10 years with Royal Trust Co. of Canada. After a period as managing director of a new company in the Isle of Man, he returned as associate director of Royal Trust in London. In 1980 Mr. Hall moved to Aitken Hume, Ltd., as investment director. He joined London-based Sarasin Investment Management in 1985 as a director with responsibility for expanding investment services and was appointed managing director in 1989.

E. Jerry James is co-founder and managing director of Trouvons Company, LLC, a financial asset recovery firm, and Steeplechase Advisors, LLC, a family office design and advisory company. A Certified Public Accountant, he received his Master of Professional Accountancy from the University of Texas at Austin. Mr. James specialized in taxation with the international accounting firm of Arthur Young & Company and developed expertise in the oil and gas business, a sizable industry in Denver where he is located. From 1983 to 1999 he concentrated on family financial and business management, serving as CEO/CFO for a multimillion-dollar family business with operations in natural resources, real estate, banking and the ski resort industry. He is President Emeritus of Top of the Rockies and a member of the American Institute of CPAs, the Colorado Society of CPAs, the National Association of Valuation Analysts and the Executive Committee of The Offshore Institute.

David Chong is admitted as a Barrister-at-law in England and Wales. He is also admitted to practice in Singapore, Malaysia, British Virgin Islands and Australia. Mr. Chong is a senior partner in David Chong & Co, which is a multinational practice with branches in seven countries. His firm also controls the Portcullis Group of Trust Companies which has subsidiaries in a number of major offshore centers. Mr. Chong is a member of the Executive Committee of the Offshore Institute and the Chairman of the Asia Pacific Branch.

Alexander Odishelidze is President of Employee Benefits Associates, Inc., a consulting firm specializing in areas of finance relating to investments, mergers/acquisitions of closely held businesses, executive compensation and fringe benefits. For more than 10 years he wrote a syndicated column for Scripps Howard which was picked up by more than 300 newspapers nationwide. Mr. Odishelidze has been the editor and publisher of a personal finance newsletter *Money Mastery* for more than six years and is the author of the book *\$Making It . . . And Keeping It!* He has been intimately involved in the self-determination/decolonization process of Puerto Rico, being the founding member of Citizens Educational Foundation, a foundation organized by a group of local business leaders to provide information about Puerto Rico’s political status. Mr. Odishelidze is author of *Puerto Rico at the Crossroads* and a soon-to-be-released book, *Puerto Rico, America’s \$21 Billion Dilemma*. Prior to his consulting and writing/publishing activities, he was a principal and CEO of an insurance company and is currently on the board of a major, publicly held U.S. insurer.



HOTEL INTER-CONTINENTAL

360, rue St-Antoine Ouest,
Montreal, QUEBEC, CANADA
H2Y 3X4

Hotel Inter-Continental Montreal is located in the heart of historic Old Montreal and is an integral part of the magnificent World Trade Center. Comprised of two buildings, linked by a windowed atrium, the hotel is within easy walking distance to the fashionable shopping, fine dining and unique cultural attractions for which the city is renowned. Only two blocks from the Montreal Convention Center, Inter-Continental Montreal is connected directly to the Metro subway system and the underground city.

Accommodations: PESI has secured a LIMITED block of rooms on a first-come, first-serve basis at the group rate of \$179 Canadian, approx \$120 American, SGL/DBL per night. Our room block will be held until 10/11/01. After this date rooms will be filled on a space- and rate-available basis only. For reservations call 514-987-9900 or 800-361-3600 and mention PROFESSIONAL EDUCATION SYSTEMS to receive the group rate.

AVAILABLE FOR PURCHASE:

Conference Materials — The compilation of written materials will be available for purchase as well as audiocassettes of the presentations (English only). Separate purchase information is on the registration panel. Please allow 4 weeks from conference for delivery.

Additional Dinner Tickets — Additional dinner tickets for guests are available for the dinner Monday evening. Tickets must be purchased in advance. Please indicate the number of additional tickets you would like on the registration panel. Each ticket is \$50 (U.S. dollars).

WHO SHOULD ATTEND?

The Offshore Institute is open to all persons possessing approved degrees or professional qualifications, or who are engaged or are studying in offshore financial planning.

PROFESSIONAL ACCREDITATION:

This conference is designed to be eligible for continuing education credits for a variety of U.S.-licensed professionals. A certificate of completion will be provided. Please contact PESI's Customer Service Department for up-to-date information regarding course accreditation by your licensing board at 800-826-7155.

Attorneys: A uniform application for accreditation has been submitted to all mandatory CLE states.

CPAs/Accountants: PESI is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Nashville, TN, 37219-2417. NASBA phone number: 615.880.4200. Web site: www.nasba.org. Sponsor #103015.

In accordance with the standards of the National Registry of CPE Sponsors, CPE credits have been granted based on a 50-minute hour
Prerequisites: none

Advanced Preparation: none

Teaching Method: seminar/lecture

Level of Knowledge: Intermediate

Fields of Study: Taxation

Maximum Recommended CPE: 13.00 credits

Please refer to the information in this brochure for outline, course content and objectives.

Certified Financial Planner® Licensees: PESI has submitted an agreement to the Certified Financial Planner Board of Standards, Inc., to meet the board's requirements covering maintenance of attendance records, retention of programs, outlines, qualifications of instructors and length of class hours. This agreement does not constitute an endorsement by the board as to the quality of the program or its contribution to the professional competence of the Certified Financial Planner™ registrant. Provider #466. CFP® and Certified Financial Planner® are federally registered service marks of the Certified Financial Planner Board of Standards, Inc.

CONFERENCE ORGANIZER AND CE PROVIDER:

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Fax completed form to **800-582-8456** or **715-833-5216**.



By PHONE:

800-826-7155 or **715-836-9700**. M-F, 8 am-5 pm, CT.



By INTERNET:

Register online at www.pesi.com.

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By MAIL: Fill out the registration form on back panel and mail to:

PESI

P.O. Box 1208

Eau Claire, WI 54702-1208

Register by October 12, 2001 and SAVE!

TUITION: (U.S. dollars) Includes conference materials, continental breakfast and lunch both days, and dinner on Monday evening.

Offshore Institute Member: \$895 per person.

Non-Offshore Institute Member: \$995 per person.

Early Registration: \$100 off per person when registering by 10/12/01.

Additional Dinner Tickets for Guests: \$50 per person. Please indicate number of tickets on the registration panel.

Call 800-826-7155, M-F 8:00-5:00 CT, or e-mail us at customerservice@pesi.com if registering within one week of conference, for space availability. Walk-ins are welcome but admission cannot be guaranteed. *PESI meeting rooms are smoke free. Please do not use cellular phones in the meeting room or record this conference.*

Conference Cancellation, Refund and Substitution Policy:

A full refund will be granted in response to written requests prior to October 12, 2001. After this date a refund less a \$100 cancellation fee will be granted. Substitutions permitted at any time. No refund after conference commences. Occasionally changes in conference are made due to speaker availability, participant demand or unforeseen circumstances. While the Offshore Institute will do everything possible to ensure participant satisfaction, the Offshore Institute's liability is limited to the registration fee only.

Offshore Institute 2001

Montreal, Quebec, Canada ■ Nov. 11-13, 2001

PRINT information for each registrant: *staple duplicate forms for multiple registrants*

Check tuition: Tuition includes book.

- Offshore Institute Member **\$895** per person 006231-MTR
- Non-Offshore Institute Member **\$995** per person
- Early Registration *by 10/12/01* **\$100 Off** per person
- Additional Dinner Tickets for Guests **\$50** per person
Indicate number of tickets _____

Indicate method of payment.

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