

+ 2026 Edition

Global Trust Options

Trust & foundation structures across the world's leading jurisdictions.

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+ № 01 · Cook Islands International Trust

Cook Islands

The gold standard that invented modern asset protection.



The Cook Islands International Trust is the world's benchmark for creditor and lawsuit protection. The Cook Islands pioneered this area of law with its International Trusts Act 1984, strengthened by the pivotal 1989 amendments, and has defended it in court more than any other jurisdiction since. For professionals and business owners with genuine litigation exposure, it remains the gold standard.

Its power rests on a simple, brutal fact: a creditor must prove fraud beyond reasonable doubt, the criminal standard used to jail people, not the civil standard used in the US. Foreign judgments carry no weight, so a creditor must re-litigate the entire case from scratch in Rarotonga, under Cook Islands law.

KEY FEATURES

+ **Beyond reasonable doubt**
  A creditor must prove fraudulent intent to the criminal standard, a wall almost no claim can climb.
+ **A brutal limitation clock**
  Protected once two years pass from the creditor's cause of action; inside that, just one year from the transfer to sue.
+ **Not a tax shelter**
  Tax-neutral. US persons owe the same tax and file Forms 3520 / 3520-A, FBAR and FATCA. This is reporting, not secrecy.
+ **Foreign judgments ignored**
  A US court order means nothing; a creditor must start the entire case again in Cook Islands courts.
+ **Only the transfer is reachable**
  Even a successful claim reaches only the specific asset transferred; the rest of the trust survives intact.
+ **Control must be genuine**
  Retain too much control and a court may cry "sham." Proper independent administration is essential.

FORMATION & COMPLIANCE

Establishment takes approximately 4 to 6 weeks from receipt of full KYC on every settlor and beneficiary, including certified identification, proof of address and source-of-funds evidence. The trust is registered with the Cook Islands Financial Supervisory Commission through your licensed trustee.

ALL-INCLUSIVE FEE

$8,495

Your annual fee covers establishment, ongoing administration, and standard correspondence.

FORMATION TIME
4–6 weeks

JURISDICTION
South Pacific

WHAT'S INCLUDED

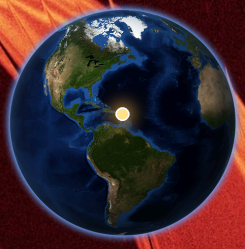
+ Establishment & trust deed drafting
+ Licensed Cook Islands trustee
+ Full first year of trusteeship
+ Registered office & agent for one year
+ Full KYC, structuring & funding guidance
+ Standard ongoing administration
+ Underlying LLC available (see below)

Underlying LLC: $1,295 per annum each.

+ № 02 · Nevis International Exempt Trust

Nevis

The private hundred thousand hurdle shield.



The Nevis International Exempt Trust is the Cook Islands' closest rival, often positioned as slightly more aggressive and more private. It is established under the Nevis International Exempt Trust Ordinance 1994, substantially strengthened by the 2015 amendments, and is commonly paired with a Nevis LLC for a powerful two-layer structure.

Its signature feature is the statutory bond: before a creditor can even file a claim against the trust, they must post US$100,000 with the Nevis authorities, raised from $25,000 in the original law and quadrupled in 2015. That single requirement kills most speculative lawsuits before they start.

KEY FEATURES

+ **The $100,000 bond**
  A creditor must post US$100,000 in Nevis before filing. Statutory since 2015, it is the biggest thing separating Nevis from the Cook Islands.
+ **Short limitation window**
  A brief one-year limitation applies, with no challenge possible at all if the trust was settled before the claim arose.
+ **Same tax reality**
  No US tax benefit; the full 3520 / 3520-A / FBAR / FATCA stack applies exactly as with the Cook Islands.
+ **Same criminal standard**
  Fraud must be proven beyond reasonable doubt, and foreign judgments and freezing orders are rejected.
+ **Built to pair with an LLC**
  The classic setup is a Nevis trust owning a Nevis LLC, giving charging-order-only protection plus a clean management layer.
+ **Strong privacy**
  Member, manager and beneficiary details are never placed on any public register.

FORMATION & COMPLIANCE

Formation is on application and begins once KYC is complete for the settlor, the trustee and every named beneficiary. Registration sits with the Nevis Financial Services Regulatory Commission, and the trust deed is held by the registered trustee rather than on any public register.

ALL-INCLUSIVE FEE

$8,495

Your annual fee covers establishment, ongoing administration, and standard correspondence.

FORMATION TIME
On application

JURISDICTION
Eastern Caribbean

WHAT'S INCLUDED

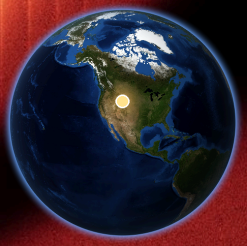
+ Establishment & trust deed drafting
+ Licensed Nevis trustee
+ Full first year of trusteeship
+ Registered office & agent for one year
+ Full KYC, structuring & funding guidance
+ Standard ongoing administration
+ Nevis LLC pairing available (see below)

Underlying LLC: $1,295 per annum each.

+ № 03 · Wyoming Asset Protection Trust

Wyoming

The onshore option: a genuine US protection trust.



The Wyoming Asset Protection Trust is the domestic alternative to the offshore fortresses: cheaper, simpler, and inside the US system. Formally a Qualified Spendthrift Trust under W.S. § 4-10-510–523, enacted in 2007, it is one of only a handful of US structures that lets you settle assets, remain a discretionary beneficiary, and still place them beyond the reach of most future creditors.

With an ordinary trust, keeping that benefit destroys the protection. Add no state income, estate or capital-gains tax and a 1,000-year dynasty duration, and Wyoming becomes a serious domestic tool, particularly for a Wyoming resident, and often used as a layer alongside an offshore structure rather than instead of one.

KEY FEATURES

+ **Be your own beneficiary**
  A self-settled trust lets you keep discretionary benefit and still shield the assets, which is impossible with an ordinary trust.
+ **No state tax**
  No state income, estate or capital-gains tax, and a 1,000-year dynasty duration.
+ **Home-state risk**
  If a creditor sues where you live, a court there may apply local law instead, as in In re Huber.
+ **Fast seasoning**
  A short two-year window for a creditor to challenge a transfer (six months from discovery).
+ **Onshore & private**
  US trustee, US assets, US courts: lower cost and complexity, with no public registry of the trust or its beneficiaries.
+ **Federal bankruptcy reach**
  The Bankruptcy Code § 548(e) lets a trustee void self-settled transfers made within ten years, far beyond the state window.

FORMATION & COMPLIANCE

Formation typically completes in 1 to 3 business days once the trust agreement is executed and the qualified transfer is properly documented. Ongoing compliance is light: a Wyoming registered agent, an annual trustee review, and standard federal tax filings.

ALL-INCLUSIVE FEE

On request

Pricing for the Wyoming structure is provided on request, tailored to residency and asset profile.

FORMATION TIME
1–3 business days

JURISDICTION
United States

WHAT'S INCLUDED

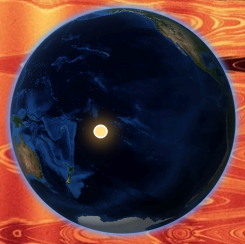
+ Establishment & trust agreement drafting
+ Qualified Wyoming trustee arrangement
+ Registered agent & office for one year
+ Qualified-transfer package & funding guidance
+ Standard ongoing administration
+ Underlying LLC available (see below)

Underlying LLC: $795 per annum each.

+ № 04 · Cook Islands Relationship Property Trust

Relationship Property

The only structure of its kind, built to protect wealth in divorce.



The Cook Islands International Relationship Property Trust is unique legislation: the only law of its kind anywhere. Created by the International Relationship Property Trusts Act 2021, it closes a specific gap: a standard trust protects you from third-party creditors, but a divorce court can still order a spouse to hand over a share of a trust's value.

Settled by two partners as co-settlors, it ring-fences specified assets so they are not divided or distributed to either spouse on separation. For someone entering marriage with significant premarital wealth, or a family business to shield, it is exactly the right tool, provided it is established in good time.

KEY FEATURES

+ **Divorce-proof by design**
  By statute, settled assets stay intact and are not divided or distributed to either spouse on separation.
+ **Protects the family business**
  Special provisions shield a family company from a forced sale; after separation, only the Cook Islands court can amend it.
+ **A new statute**
  As a 2021 law it has little tested case history yet. Genuinely powerful, but its track record is young.
+ **Foreign divorce orders ignored**
  A foreign order dividing the assets contrary to the trust's terms is neither recognised nor enforced.
+ **Timing is everything**
  Set it up while the relationship is harmonious, ideally before or early in marriage, and never amid a dispute.
+ **Not automatic creditor cover**
  It lacks the standard trust's fraudulent-transfer provisions; for both, it must be dual-registered.

FORMATION & COMPLIANCE

Both partners sign as co-settlors, each with independent legal advice and full disclosure of the assets being settled. Where creditor cover is also required, registration is completed at establishment under both the International Relationship Property Trusts Act and the International Trusts Act.

ALL-INCLUSIVE FEE

$8,495

Your annual fee covers establishment, ongoing administration, and standard correspondence.

FORMATION TIME
On application

JURISDICTION
South Pacific

WHAT'S INCLUDED

+ Establishment & trust deed drafting
+ Licensed Cook Islands trustee
+ Full first year of trusteeship
+ Relationship agreement & independent-advice framework
+ Full KYC, structuring & funding guidance
+ Standard ongoing administration
+ Dual registration for creditor cover available

Underlying LLC: $1,295 per annum each.

+ № 05 · New Zealand Foreign Trust

New Zealand

A clean, credible base for holding and passing on foreign wealth.



The New Zealand Foreign Trust is different in kind: a tax and succession vehicle rather than a creditor fortress. Under the Income Tax Act 2007, foreign-sourced income is exempt from New Zealand tax where the settlor has never been a New Zealand resident, even though the trustee is based in a respected, OECD-cooperative country that appears on no blacklist.

For a client who wants a credible-looking structure rather than a secretive one, that reputation is the entire point. It is best understood as a legitimate vehicle for holding and passing on foreign wealth: transparent, well-regulated, and reputationally clean.

KEY FEATURES

+ **Foreign income untaxed**
  With a non-resident settlor, foreign-sourced income is exempt in NZ under ss. CW 54 / HC 26. NZ-sourced income is still taxed.
+ **Estate & succession tool**
  Best understood as a credible vehicle for holding and passing on foreign wealth, not for hiding from creditors.
+ **A fragile exemption**
  If a settlor is ever NZ tax-resident, even briefly, the exemption can collapse, potentially retrospectively.
+ **A clean passport**
  Post-2017 reforms made NZ a well-regulated, cooperative jurisdiction, a genuine selling point for reputation-sensitive clients.
+ **Heavy compliance**
  Since the 2016 Panama Papers, trustees must register with IRD, file annual returns, and disclose all settlors and beneficiaries.
+ **Weak on protection**
  It carries none of the Cook Islands / Nevis anti-creditor machinery; full transparency to IRD and, via CRS, to your home authority.

FORMATION & COMPLIANCE

Your trustee registers the trust with Inland Revenue within 30 days of settlement and files an annual return disclosing settlors, beneficiaries and financial statements. Formation is on application, once KYC and source-of-funds documentation are complete.

ALL-INCLUSIVE FEE

$8,495

Your annual fee covers establishment, ongoing administration, and standard correspondence.

FORMATION TIME
On application

JURISDICTION
Oceania

WHAT'S INCLUDED

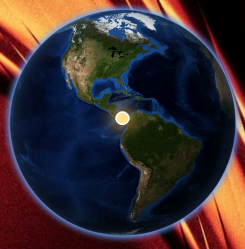
+ Establishment & trust deed drafting
+ Licensed New Zealand resident trustee
+ IRD registration & foreign-trust disclosure
+ Full KYC, structuring & funding guidance
+ Standard ongoing administration & annual filing
+ Succession & distribution planning

Underlying LLC: $1,295 per annum each.

+ № 06 · Panama Private Interest Foundation

Panama

A civil-law entity that owns your wealth and passes it on without probate.



The Panama Private Interest Foundation is neither a trust nor a company, but a civil-law entity with its own legal personality and no owners at all. Established under Law 25 of 1995, it excels at succession: because the foundation owns the assets, at death they pass to beneficiaries privately, with no probate, like a private and hard-to-contest will.

Crucially, it can override the forced-heirship rules of the founder's home country, a core reason civil-law families across Latin America and Europe use it. Foreign income is not taxed in Panama, and beneficiaries are named only in the private, unregistered regulations.

KEY FEATURES

+ **No owners, no probate**
  The foundation owns the assets; at death they pass to beneficiaries privately per its regulations, bypassing probate entirely.
+ **Territorial tax & privacy**
  Foreign income is not taxed in Panama; beneficiaries are named only in the private, unregistered regulations.
+ **Improving standing**
  Panama came off the FATF grey list in 2023 and is working through the EU tax list, with exit targeted for 2026 to 2027.
+ **Overrides forced heirship**
  Article 14 disapplies the forced-heirship and matrimonial rules of the founder's home country.
+ **Three-year certainty**
  Once three years pass from a transfer, it can no longer be set aside for fraud, giving a clear and finite window.
+ **US persons: still a trust**
  The IRS generally treats it as a foreign trust, so Forms 3520 / 3520-A and CRS reporting still apply.

FORMATION & COMPLIANCE

Formation takes about one week once documentation is in: for the founder and all council members, a certified passport copy and proof of address within 90 days, plus two-year bank and professional references. We also need the proposed name, the charter, three council members, the asset types held, and source-of-funds evidence.

ALL-INCLUSIVE FEE

$4,995

Your annual fee covers establishment, ongoing administration, and standard correspondence.

FORMATION TIME
1 week

JURISDICTION
Central America

WHAT'S INCLUDED

+ Establishment & foundation charter drafting
+ Foundation council arrangement
+ Full first year of council services
+ Registered agent & office for one year
+ Full KYC, structuring & funding guidance
+ Standard ongoing administration
+ Private regulations & succession planning

Underlying Panama company available on request.