

Juan

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From: sergey.bezborodov@ch.pwc.com [<mailto:sergey.bezborodov@ch.pwc.com>]

Sent: 20 December 2012 17:44

To: Juan Thornley

Cc: Andri Manatschal; giovanna.mattle@ch.pwc.com

Subject: A Group - CLG structuring slides.pptx

Dear Juan

Long time no hear! I hope you are doing well and are ready to kick off the holiday season.

We have a new client case for you, which will need to be handled in early January with a view to setup the structure and transfer the assets by the end of January. Our private client, of Eastern European origin but living and tax resident in Switzerland for many years, intends to transfer his wealth (operating companies and private real estate assets) into an asset protection structure.

The client dislikes trusts as during lifetime he wants to actively run the business and is not ready to give up control to a trustee. We therefore came up with a combined structure - CLG + trust.

We will require your help with setting up two CLGs in the Isle of Man and drafting/customizing M&AA. The structure will be managed/administered by a service provider based in Zurich, therefore no trustee/directorship services will be required from Appleby.

If you can have a look at the attached proposed structure and give your fee estimates (if possible still this week or before 31.12.12), we will much appreciate this.

Best regards
Sergey

Sergey Bezborodov, LL.M (Leiden)

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(See attached file: A Group - CLG structuring slides.pptx)

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