



Global Shell Games

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What Does a Shell Company Look Like?



Republic of Seychelles
INTERNATIONAL BUSINESS COMPANIES ACT, 1994
(Act 24 of 1994)

Certificate of Incorporation

THIS IS TO CERTIFY that, all the requirements in respect of incorporation under the International Business Companies Act, 1994 having been satisfied,

GRUPPO20 ENTERPRISES INC.

is incorporated in the Republic of Seychelles as an International Business Company,

This **6th** day of **April** **2009**

Given at Victoria, Seychelles.



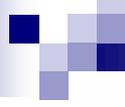
Jimmy Ernesta
Seychelles International Business Authority
REGISTRAR OF INTERNATIONAL BUSINESS COMPANIES

Certificate No.: **060630**



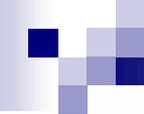
What Should Happen

“Countries should take measures to prevent the misuse of legal persons for money laundering or terrorist financing. Countries should ensure that there is adequate, accurate and timely information on the beneficial ownership and control of legal persons that can be obtained or accessed in a timely fashion by competent authorities”(FATF Recommendation 24, formerly Recommendation 33).



The Problem

“A corporation is a legal person created by state statute that can be used as a fall guy, a servant, a good friend or a decoy,.. A person you control... yet cannot be held accountable for its actions. Imagine the possibilities!” (Wyoming Corporate Services).



Control (Placebo) Email

Dear [name/company]

I am an international consultant living in [Norstralia]. My associates and I have been based In [Norstralia] for some time and we have done extensive international work, especially in your area.

After looking at the specific needs of our growing company, we were feeling that it would make sense for us to expand and to set up an international company. We especially hope to limit taxes and reduce liability.

We were wondering what you require us to give in order to do this. We would like to form this corporation as privately as possible. What identifying documents will you need from us? We would also like to know what your usual prices are. We appreciate the help. I travel a lot for my work, so I communicate best via email.

I hope to hear from you soon.

Yours,
[alias]



FATF Treatment

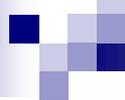
Dear [name/company]

I am seeking information on how to incorporate an international company. I hope that you might be able to offer what I need. I am a consultant, and my business associates and I live in [Norstralia]. Much of our business originates here, where we operate, but our company also grows quickly among international clients. Many of them are in your area. So, we feel that incorporation is a necessary option for us.

We hope to limit taxes obligations and business liability. We would like to know if you feel that you will be able to service us with a corporation. What identifying documents will you request or this transaction? We would prefer to limit disclosure as much as possible.

My internet searches show that the international Financial Action Task Force sets standards for disclosure of identifying information when forming a company. But I would like to avoid providing any detailed personal information if possible. If you could answer these questions and also let us know about your prices, we very much appreciate it. Thank you for the time to address our query. Business obligations make communication difficult, so we would prefer to correspond with email.

Until we speak again, [alias]



US IRS Treatment

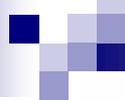
Dear [name/company]

I am a resident of [Norstralia] and would like to inquire about your process to form a corporation. With several associates, I operate consulting firm in [Norstralia]. We deal with a growing number of clients in your area, and would like to pursue incorporation options for liability and taxes purposes.

We are particularly concerned with keeping business interactions private; thus, we are eager to limit information disclosure as much as possible. **My internet searches show that the United States is part of the international Financial Action Task Force, which requires disclosure of identifying information when forming a company. I also hear that the Internal Revenue Service can enforce these requirements.**

But I would like to avoid providing any detailed personal information if possible. Can you please inform me what your start-up costs are and what kind of identification or documents we will need to provide? We are all fairly burdened with commitments, so email communication is preferable.

Thank you in advance, [alias]



Premium Treatment

Dear [name/company]

I am a consultant living in [Norstralia] who seeks to set up an international corporation to help with my growing business.

My associates and I work in [Norstralia], though we have a growing number of international clients and have begun work with clients in your area. In order to get the best tax rates and limiting liability, we have decided to set up an international company. Right now, we would like to know more information about what identification and documents you require and how much such services cost.

We all highly value our privacy and would like to do this as confidentially as possible. **I am willing to pay a premium to retain confidentiality.** I look forward to hearing from you soon and hope that you will be able to help us.

I have many business comitments and frequently travel so the best way to reach me is via email.

Thank you, [alias]



Corruption Treatment

Dear [name/company]

I am consultant living in **[Guineastan]**. I have a business with some colleagues that is based here in **[Guineastan]**, it has grown recently to the extent that international incorporation has now become an option that we wish to pursue, largely for taxes and liability purposes.

We have several international clients, many of whom are in your region, so an out-of-country business entity would be helpful. **We focus specifically on public-sector consulting for government procurement.** We would ideally like to form this incorporation confidentially.

Would you please indicate the identifying documents we will need to provide? Can you also outline your probable costs? If possible, please respond by email, as I am out of the office with meetings frequently.

Thank you, [alias]



Terrorism Treatment

Dear [name/company]

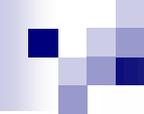
I would like to inquire about incorporating my business and wanted to see if you might help me.

Phone communication is difficult due to business travel so I prefer to correspond through email. I and a handful of colleagues run a consulting firm in **Saudi Arabia, though I am a [Middle East] national. We consult for a number of Muslim aid organizations.**

We are resident here, as well as many of our clients. But over time, our business has been expanding internationally—in fact we have been doing work in your area—and we would like to take advantage of the tax benefits and liabilities protection of incorporating internationally. We are interested to know if this service can be provided confidentially. If you could let us know how much this might cost and what documents and identification you require, that would be most helpful.

I do not want to be too bothersome to you, but I do hope that you can help me by answering my questions and letting me know my options.

Regards, [alias]



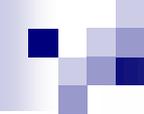
Refusal

To: Mark Brown (US IRS Treatment)
From: US Incorporation Service

Thank you. No thank you.

To: Rakhman Sokolov (Tajikistan)
From: US Law Firm

Not a problem RS. You should concentrate on making an honest living you seem like a bright guy.



Angry Refusal

To: Mikkel Pederson (Managerial Treatment)
From: Australian Incorporation Service

Dear Mikkel

I am assuming that your email was completely fraudulent....

[I]f you indeed your intention behind contacting me is to make a lazy, fraudulent buck at the expense of others, then please spare a thought for the prospect you will remain a complete, impoverished idiot for the rest of your life and die poor and sad.

I will be leaving you nothing in my will.

Regards

Ambiguous Refusal

To: Omar Rana (Terrorism Treatment)
From: US Law Firm

[Y]our started purpose could well be a front for funding terrorism, and who the fuck would get involved in that? Seriously, if you wanted a functioning and useful Florida corporation you'd need someone here to put their name on it, set up bank accounts, etc. I wouldn't even consider doing that for less than 5k a month, and I doubt you are going to find any suckers that will do it for less, if at all. If you are working with less than serious money, don't waste anybody's time here. Using a fucking google account also shows you are just a fucking poser and loser. If you have a serious proposal, write it up and we will consider it. Your previous message and this one are meaningless crap. Get a clue. Just how stupid do you think we are?

Compliant

To: Rakhman Sokolov (Corruption Treatment)

From: St. Kitts and Nevis Incorporation Service

Herewith, the requisite forms for your to complete. The identifying documents you must send are as follows:

1. Certified copies of the information pages of your passport or of your driver's licence
2. Certified copies of two utility bills or other, showing your usual place or residence
3. Two reference letters, one from a bank and the other from a business or other associate.

Have these sent directly to us from the persons giving the same. Please remit half of the fee at this time (see wire instructions below).



Non-Compliant Responses

To: Abdullo Ogorodov, Uzbekistan
From: US Incorporation Service

We don't need a whole lot of info from you. You can place the order on our website under starting your company. It should only take 10 minutes and that is all the information we need from you.

To: Kylych Almas, Kyrgyzstan
From: US Incorporation Service

All that you need to do is to provide the name you want for you new company, that's it.

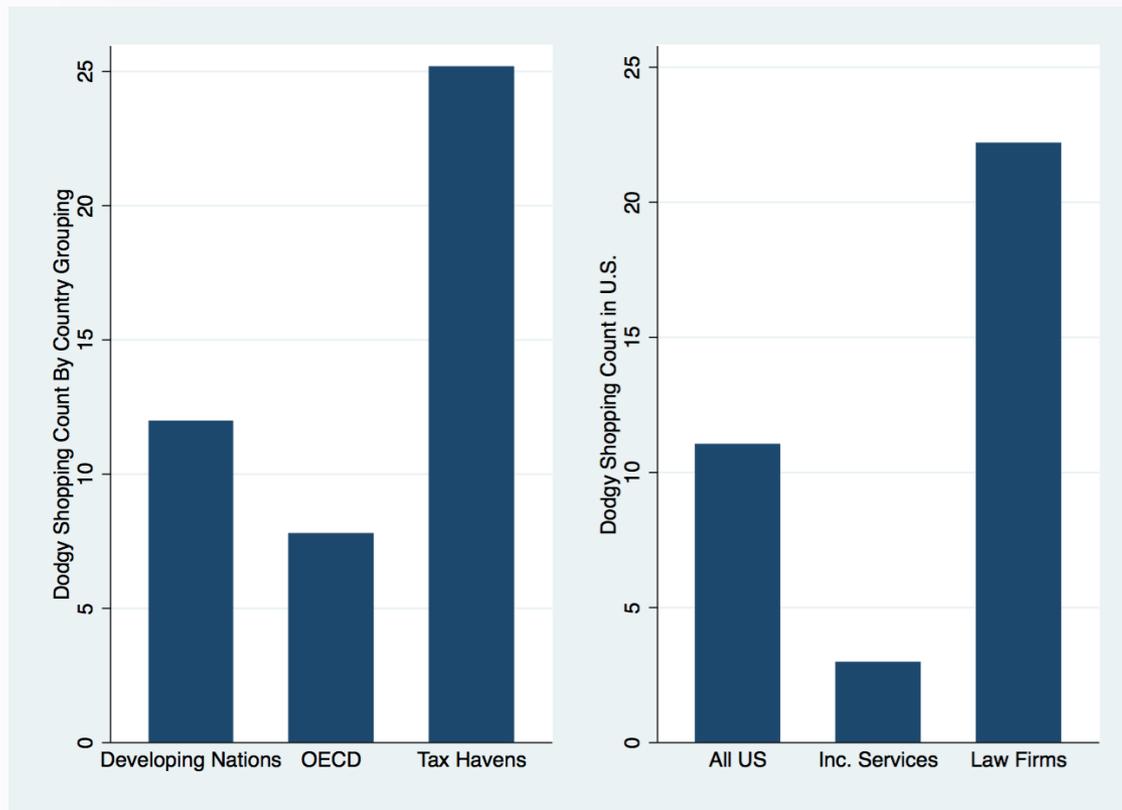
Non-Compliant Response to Terrorism Treatment

To: Omar Rana, Pakistan

From: US Law Firm

If you are looking for discretion do not incorporate in Nevada. The preferred state is Delaware. The yearly fees are (\$110 agent fee and \$125 franchise tax fee = \$235). And Delaware does not put all of your corporate information on their website for the world to see. We don't need any identifying documents. Just the name of the entity. Who you want me to send the documents to (name and address). And a credit card (MasterCard, Visa, American Express). We do not accept Bank transfers. Let me know if you have any other questions.

Compliance by Country Type



Treatment Effects

