

## **Secrecy Indicator 15: Harmful Structures**

### **What is being measured?**

This indicator assesses the availability of four harmful instruments and structures within the legal and regulatory framework of a jurisdiction:

1. **Regarding Large Banknotes (or high denomination cash bills):** it assesses whether a jurisdiction issues or accepts the circulation of large banknotes of its own currency (of value greater than US\$200, €200 or £200);
2. **Regarding Bearer Shares:** it assesses whether companies are available with unregistered bearer shares. Either bearer shares<sup>1</sup> should not be available in the jurisdiction or, if available, there should be mechanisms to ensure that all existing bearer shares are<sup>2</sup> immobilised or registered with a government authority (including a country’s Central Securities Depository, if properly regulated);
3. **Regarding “Series limited liability companies” (Series LLCs) and/or “Protected cell companies” (PCC):** it assesses whether a jurisdiction allows the creation of Series LLCs and/or PCCs in its territory. The latter is also known as an “incorporated cell company” or “segregated account company”;
4. **Regarding trusts with flee clauses:** it assesses whether a jurisdiction prohibits the administration of (foreign or domestic law) trusts with flee clauses for any trustee within its territory.

Accordingly, we have split this indicator into four components. The overall secrecy score for this indicator is calculated by simple addition of the secrecy scores of each of these components. The secrecy scoring matrix is shown in Table 1, with full details of the assessment logic given in Table 2.

The main sources for this information are the Global Forum peer reviews<sup>3</sup> and private internet websites such as [www.offshoreinvestment.com](http://www.offshoreinvestment.com), [www.ocra.com](http://www.ocra.com) and [www.lowtax.net](http://www.lowtax.net), or directly searching the specific features by name on the

internet for their availability. Some of the aforementioned sources display the availability of Series LLCs and/or protected cell companies either in a tabular or textual format. They have also helped us determine whether trusts with flee clauses are prohibited. In some cases, the TJN-Survey 2021 provided useful information.<sup>4</sup> Main sources for the issuance and circulation of large cash bills were the Central bank’s website of each jurisdiction, studies by the Financial Action Task Force<sup>5</sup> and the European Police Office’s Financial Intelligence Group,<sup>6</sup> as well as Peter Sands’ (Harvard Kennedy School) case for their elimination.<sup>7</sup> We have also referred to local regulators’ and central banks’ websites.

**Table 1. Secrecy Scoring Matrix: Secrecy Indicator 15**

Regulation	Secrecy Score Assessment [Secrecy Score: 100 points = full secrecy; 0 points = full transparency]
<b>Component 1: Large Bank Notes (25 points)</b>	
<b>Large banknotes are accepted as legal tender and/or issued</b> Own currency banknote of value greater than US\$200, €200 or £200.	25
<b>Large banknotes neither accepted as legal tender nor issued</b> No own currency banknote with a value of, or greater than, US\$200, €200 or £200.	0
<b>Component 2: Bearer Shares (25 points)</b>	
<b>Bearer shares available</b> Companies with unregistered bearer shares are available.	25
<b>Bearer shares not available</b> Bearer share companies are not available, or all bearer shares are registered with a public authority.	0
<b>Component 3: Series LLCs/PCCs (25 points)</b>	
<b>Series LLCs or PCCs are available</b> Domestic legislation provides for the creation of Series Limited Liability Companies or of Protected Cell Companies.	25
<b>Neither Series LLCs nor PCCs are available</b> Domestic legislation does not provide for the creation of Series Limited Liability Companies nor of Protected Cell Companies.	0
<b>Component 4: Trusts with Flee Clause (25 points)</b>	
<b>Administration of trusts with flee clauses is not effectively prevented</b> Domestic and/or Foreign Law trusts administered by domestic trustees can include flee clauses in their deeds.	25
<b>Trusts with flee clauses cannot be administered or created</b> Domestic and Foreign Law trusts administered by domestic trustees are prevented from including flee clauses in their deeds.	0

## Why is this important?

### Component 1: Large Banknotes

Cash is anonymous, does not leave an audit trail and is universally accepted, which is why it is often used in illicit activities. Cash is almost always used by criminals at some stage in the money laundering process. The Financial Action

Task Force’s 2015 study on money laundering through the transportation of cash has shown that criminally derived cash usually originates from an extremely wide range of predicate offences, including drug and human trafficking, terrorism, corruption, and tax fraud.<sup>8</sup>

In many instances, where concealment is necessary for smuggling, large cash bills or high denomination banknotes are used because they are easier to hide than mixed or lower denomination notes, making it harder for law enforcement authorities to intercept. The existence of large banknotes enables the transportation of higher values of currency at one time, but also increases the size of loss if discovered. The EUR 500, also known as the “bin Laden” after the former Al Qaeda leader Osama bin Laden and the second largest note in circulation in Europe after the CHF 1,000, is particularly popular for illicit activity for its ease in concealment. For example, EUR 20,000 in EUR 500 notes can be hidden in one cigarette packet and an adult male cash courier – or “mule” – can stuff and swallow EUR 150,000 using these large banknotes.<sup>9</sup> The EUR 500 also takes up far less space than the largest US dollar note, the US\$100. A 2016 Harvard University study showed that carrying US\$1 million in new 100 dollar bills weighs 10 kilograms and would fill most of a 15-litre briefcase, while carrying the same amount in EUR 500 would weigh just 2.2 kilograms and could be carried in a small bag.<sup>10</sup>

Large banknotes are used infrequently in the legitimate cash economy. Most consumers do not make payments with these high denomination notes, preferring electronic payment options for high value purchases and transactions. The European Police’s (EUROPOL) Financial Intelligence Group queried the purpose of the EUR 500 because it is not commonly used for payments but accounted for one-third of EUR notes in circulation; some of which could be hoarded, but even if only a small amount is used in criminal activity and money laundering, it is still substantial in absolute terms.<sup>11</sup> Many businesses do not accept these large notes due to security and fraud risks. Rather, as the denomination and value of cash increases, the balance of benefits with risks and costs deteriorates.<sup>12</sup> Various studies and anecdotes reveal the extent to which large banknotes are used for criminal purposes.

For example, the United Kingdom’s Serious and Organised Crime Agency carried out an 8-month assessment on the use of the EUR 500 banknote, revealing that 90% of the demand for it within the UK was from criminals.<sup>13</sup> As a result, the EUR 500 was voluntarily withdrawn from circulation by the private sector.<sup>14</sup> Other European countries have also had similar experiences with this large note. The biggest ever cash seizure in Portugal was made following investigations into suspected money laundering organised by an Angolan General and it amounted to EUR 8 million, almost all denominated in EUR 500 notes.<sup>15</sup> EUROPOL even reports that certain law enforcement agencies have observed that the “EUR 500 notes trade hands at above their face value in the criminal environment, so important is their role in cash transportation for money laundering”.<sup>16</sup>

Following concerns over the illicit use of the EUR 500 banknote, the European Central Bank announced in May 2016 that it would discontinue production of the EUR 500. However, it remains legal tender and retains value,<sup>17</sup> and the UK's National Crime Agency suggests that EUR 200 and EUR 100 notes are likely to be increasingly used in criminal activity.<sup>18</sup> Similarly, the largest banknote in the world, the Singapore Dollar 10,000 (approx. US\$7,400), was discontinued in 2014, but remains legal tender indefinitely.<sup>19</sup> Singapore chose to discontinue the issuance of the SGD 10,000 to mitigate money laundering risks, especially associated with its popular gambling industry.<sup>20</sup> In 2020, Brunei discontinued its BND 10,000 (which is worth like SGD 10,000 and can be used in Singapore), but existing banknotes will remain legal tender.<sup>21</sup> Canada discontinued its CAD 1,000 banknote already in 2000, but the notes remain in circulation<sup>22</sup> up until 2021, from which it is no longer considered as legal tender.<sup>23</sup>

Cash, and therefore large banknotes, can also help facilitate tax evasion through enabling the hoarding of cash outside the banking system and the payment for transactions without a paper trail. To tackle tax evasion and counterfeit money, the Indian government withdrew its two largest notes from circulation INR 1,000 and INR 500 (equivalent to just over US\$ 15 and 7, respectively) at the end of 2016 as part of a demonetisation and remonetisation process, requiring people to swap this money at banks and post offices for legal tender.<sup>24</sup>

As Sands points out, the impact of ending the issuance of large denomination notes on money laundering is limited as long as large banknotes issued by different jurisdictions remain legal tender and in circulation.<sup>25</sup> Therefore, in particular the elimination of the highest banknotes with values above US\$200, €200 or £200 would curtail the secrecy in financial transactions that enables illicit financial flows. Those currencies and the corresponding banknotes are, in order of diminishing value: BND 1,000, SGD 1,000, CHF 1,000, EUR 500 and AED 1,000. Ending their circulation by ending the status of legal tender of those banknotes would not negatively affect licit uses of cash, but increase the cost and risk of detection of criminal cash transactions.

## Component 2: Bearer Shares

The Financial Action Task Force defines bearer shares as referring to “negotiable instruments that accord ownership in a legal person to the person who possesses the bearer share certificate”.<sup>26</sup>

Ordinarily, joint stock companies issue registered shares. On a registered share certificate, the name of the shareholder is spelled out. In addition, the identities and names of the shareholders are recorded at registers held by the company, and are often reported to public registries run by the government. This ensures in principle that ownership of the company can be verified by third parties at any time.

In contrast, on bearer shares, the names of the shareholders are not written, nor is a record kept at company level or elsewhere about the identities of the shareholders. Instead, any person who literally holds the share certificates in his or her hands, is for legal purposes the owner of the share and of the company (if all shares are held). They are used to preserve anonymity on the part of owners because they are effectively untraceable.

In their landmark joint report on grand corruption “The Puppet Masters”, the World Bank and UNODC argue that investigators found bearer shares “[...] to be one of the most challenging obstacles to overcome”.<sup>27</sup> In the same report, a case is described in detail on how bearer shares have been abused:

The Case of Former President Frederick Chiluba (Zambia): Iqbal Meer, a London-based solicitor, was among the defendants in a private civil asset recovery action brought by the Zambian attorney general in the U.K. High Court against his law firm and others for their role in assisting President Frederick Chiluba and his director general of the Zambian Security and Intelligence Services (ZSIS), X. F. Chungu, to funnel funds stolen from the Zambian government. In his judgment delivered on May 4, 2007, Mr. Justice Peter Smith held that Meer had incorporated a British Virgin Islands International Business Company, Harptree Holdings Ltd., with the company’s bearer shares held in trust by a nominee at Bachmann Trust Company Ltd. Harptree Holdings had been formed to purchase real estate in Belgium—a block of flats and an apartment hotel—to pay off one of the co-conspirators in the case, Faustin Kabwe, who was identified in the court’s judgment as a close friend and financial adviser to Chiluba and Chungu. This involved the transfer of funds from Zambia’s ministry of finance to an account in London (referred to as the Zamtrop account) and from that account to a Zambian financial services company, in which Kabwe was one of the main controlling officers. Suspicions of Meer’s involvement in this Zamtrop conspiracy (as it later became known) resulted in the U.K. Office for the Supervision of Solicitors paying Meer a visit in April 2003. They asked him specifically about the ownership of Harptree. He responded, “I have no idea whether Kabwe is holding the bearer shares in his hands or whether somebody else is holding [the] bearer shares”—demonstrating clearly how a bearer-share construction can allow someone to easily and accurately deny knowledge of ownership of a legal entity.

Mr. Justice Smith concluded: “In my view it is obvious. The [...] purchase was FK’s [Faustin Kabwe’s] payoff for his role in the conspiracy. IM [Iqbal Meer], whilst he did not know the overarching conspiracy details, took instructions from FK on behalf of Harptree, because he believed it belonged to him beneficially. Yet he knew that the purchase was funded by government monies via the Zamtrop

account but did not question FK's entitlement to them. That failure (even if his case that it was a ZSIS purchase is to be believed) and the failure to record that matter in any document are actions again which an honest solicitor would not do. Such a large purchase of a block of flats and an apartment hotel cannot conceivably have been regarded as a purchase for ZSIS operations. Equally, the labyrinthine routing of the ownership of the properties—via a BVI holding company with nominee directors and bearer shares and a Luxembourg company interposed—shows that the whole operation was to hide things.”<sup>28</sup>

Because of the international consensus about the enormous risks associated with bearer shares (eg. among FATF, UNODC, World Bank), many jurisdictions have legislated for ending the issuance of bearer shares in the future. Following recommendation 24 by the FATF,<sup>29</sup> some jurisdictions have added a requirement to convert existing bearer shares into registered shares, or to immobilise and/or register existing bearer shares with a custodian or public registry. However, these policies have not always been successful. Whilst some countries might require by law that bearer shares are converted into registered shares, a deadline might not have been set. Other countries require the shares to be registered only by some company service provider or professional, without reporting the shareholders and beneficial owners to a registry. In this case, the risk and incentives for manipulation (such as backdating changes) of the ownership remain far higher than with publicly registered shares.

### **Component 3: Series LLCs/Protected Cell Companies**

Protected Cell Companies are a rare type of corporate entity found almost exclusively in secrecy jurisdictions. Essentially it is a legal entity that contains within itself, but not legally distinct from it, a number of cells which behave as if they are companies in their own right, but are not. Every cell has its own share capital, assets and liabilities and the income and costs of each cell may be kept separate. Moreover, each cell is assigned its own share of the overall company share capital so that each owner can be the sole owner of one cell but owns only a percentage of the overall Protected Cell Companies.

Series LLCs serve similar purposes as Protected Cell Companies and originated in Delaware, but are now available in other US states.<sup>30</sup> They are frequently used by hedge funds, venture capital funds and real estate investors.<sup>31</sup> Series LLCs are a cheap way for producing hundreds of companies within an umbrella company. Depending on the state law, each of those series/cells needs to prepare a separate annual account, but needs to file only one tax return.<sup>32</sup> The cost for setting up 100 companies therefore could be as low as 5700 US\$.<sup>33</sup>

Protected Cell Companies originated in Guernsey in 1997 with the intention of providing a cost-saving mechanism for the reinsurance sector where many deals look much like one another, and where assets and liabilities need to be ring

fenced to prevent inappropriate exposure to claims. Protected Cell Companies may however be used for other, illicit, purposes rather than that for which they were originally created. The proliferation of investment funds, including of hedge and private equity funds, appears to be supported by the availability of Protected Cell Companies,<sup>34</sup> thus exacerbating the risks stemming from the hypercomplex investment fund industry.<sup>35</sup> The level of asset protection and ambiguity of ownership and control that a Protected Cell Company provides might allow illicit financial flows to escape the attention of law enforcement authorities. We therefore question whether the potential benefits these structures might allow to the reinsurance sector justify the broader risks and costs they impose on society at large.

The structure of Protected Cell Companies has been compared to a house with a lock at the entrance and many rooms inside, each room locked separately with its own key, but also with an escape tunnel only accessible from inside the room. If an investigator seeks to find out what is going on in one room inside the house, she first needs to unlock the main outer door. But imagine that by opening that first door everybody inside the building is alerted to the fact that someone has entered the house. Anybody seeking to flee the investigator will be given enough time to do so thanks to the second lock at the individual room door. While the investigator tries to unlock the second door (by filing a costly and time-consuming information request), the occupant of that particular room has plenty of time to erase evidence and escape through the secret tunnel. This colourful metaphor neatly illustrates how a Protected Cell Company might work in practice.

It is uncertain how current mutual legal assistance agreements will apply to Protected Cell Companies, and if regulators and law enforcement agencies are able to obtain all necessary information across borders from these companies. There are vast possibilities for using Protected Cell Companies for misleading the public, financial institutions and their customer due diligence processes, investors, tax authorities, financial regulators and law enforcement agencies. They can easily be used by individuals to conceal their ownership of assets and their identities by hiding their full control and ownership over one cell within the “wrapper” behind the artificial shell in which these individuals only appear to be invested in a minority investment position.

## Component 4: Trusts with Flee Clause

Some trusts<sup>36</sup> contain a flee clause (or flight clause) in their trust deeds or agreements obliging the trustee to change the trust address, its governing law, or the trustee itself under certain circumstances. Flight is commonly triggered as soon as the trust becomes subject to, say, an investigation by a foreign authority, or a change of laws that could affect the trust, like a new tax. This clause is incredibly simple yet hard to detect. It only requires the trustee to state on a

piece of paper that the trust is now governed by X jurisdiction’s laws, or that the trustee is now Y person, and – voilà – the trust has relocated to a jurisdiction thousands of kilometres away, with no registration or external approval.<sup>37</sup>

Flee clauses allow trusts to remain under the radar. A settlor may choose the law of a supposedly “respectable” jurisdiction (like New Zealand) that would not tend to raise suspicion by any authority. Flee clauses typically relocate the trust so that it is governed under the laws of a debtor-protecting jurisdiction, such as the Cook Islands or Belize. This mechanism allows the settlor or beneficiary to remain one step ahead of law enforcement authorities or private investigators and therefore boosts secrecy to users of trusts.

Trust flee clauses are particularly obstructive of law enforcement. There are few situations in which flee clauses cannot be deployed for some kind of evasion of the consequences of illegal actions. The marketing and use of trusts as “asset protection” facilities including flee clauses often advertise the advantages in terms of “shielding” corporate assets from creditors, fleeing bankruptcy orders, spouses or inheritance provisions of the resident state of the settlor and/or beneficiary.

**All underlying data, including the sources we use for each jurisdiction, can be viewed in the [country profiles](#) on the [Financial Secrecy Index website](#).**

**Table 2. Assessment Logic: Secrecy Indicator 15 - Harmful Structures**

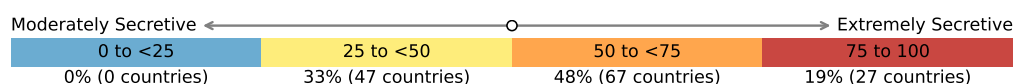
ID	ID description	Answers (Codes applicable for all questions: -2: Unknown; -3: Not Applicable)	Valuation Secrecy Score
488	Does the jurisdiction issue or accept circulation of large banknotes/cash bills of its own currency (of value greater than 200 EUR/GBP/USD)?	YN	If answer N: 0 points; otherwise 25 points
172	Are bearer shares available?	0: No, bearer shares are not available/not circulating; 1: No, bearer shares are always immobilised/registered by a public authority; 2: Yes, but status is unknown; 3: Yes, unregistered bearer shares are available/circulating or registered by a private custodian.	If answer 0 or 1: 0; otherwise 25
184	Companies - Available Types: Protected Cell Companies/Series LLCs?	YN	If answer N: 0; otherwise 25
224	Trusts - Are trusts with flee clauses prohibited?	YN	If answer Y: 0; otherwise 25



## Results Overview

**Figure 1. Harmful Structures: Secrecy Score Overview**

CA	EC	IN	MV	PE	SE	AI	BN	DM	GI	IT	LK	MO	PR	TR	VN	BS	GR	MY	VG	
BW	DO	HU	MK	OM	SA	AD	BM	CY	GG	IM	LC	ME	PL	TH	VI	BE	FI	MT	VC	
BD	DK	GU	LB	NZ	RU	ZA	BH	CN	GB	IL	KZ	MC	PK	TC	VE	AT	ES	MH	SK	
AW	CR	GM	KW	NR	RS	UY	BG	CK	FR	ID	KY	MA	PA	SM	US	AG	DE	LU	SG	
AU	CO	GH	KE	NO	RO	TZ	BB	BZ	FJ	HR	KR	LV	NA	SI	UA	AE	CZ	LI	SC	
AS	CM	GD	JO	NG	PY	TN	AO	BR	EE	HK	JP	LT	MU	RW	TW	XK	CW	KN	PT	
AR	CL	EG	IS	MX	PH	SV	AL	BO	DZ	GT	JE	LR	MS	QA	TT	WS	CH	IE	NL	VU

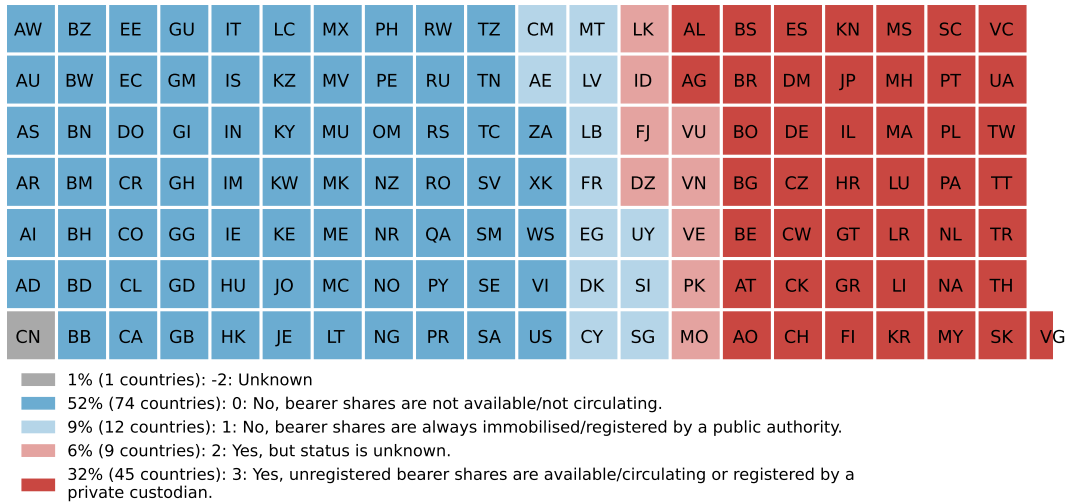


**Figure 2. Large Banknotes (ID 488)**

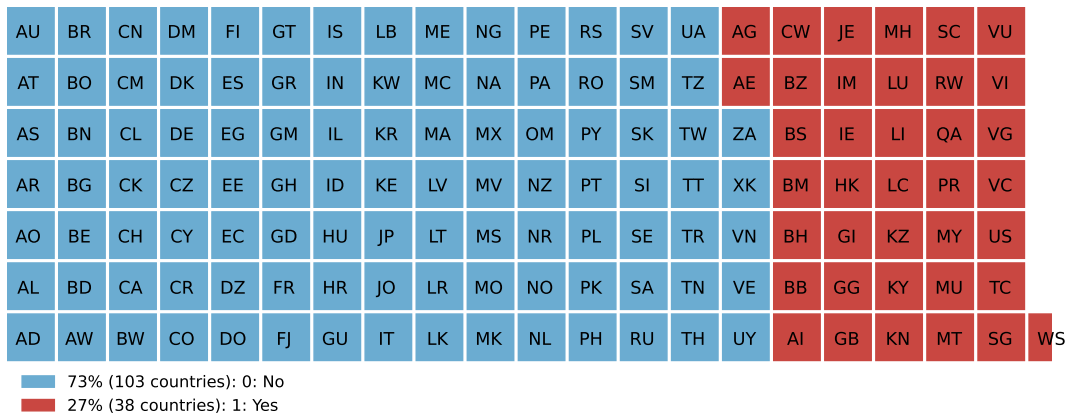
AU	BO	CL	DM	GD	HK	IS	KW	MA	MX	OM	PY	SC	TT	VE	AD	CZ	IE	ME	SM	
AS	BM	CK	DK	GB	GU	IN	KR	LR	MV	NZ	PR	SA	TR	VC	ZA	CY	GR	MC	SK	
AR	BH	CA	CW	FJ	GT	IM	KN	LK	MU	NR	PL	RW	TN	UY	WS	CH	FR	LV	SI	
AO	BG	BZ	CR	EG	GM	IL	KE	LC	MS	NO	PK	RU	TH	US	VU	BN	FI	LU	SG	
AL	BD	BW	CO	EC	GI	ID	JP	LB	MO	NG	PH	RS	TC	UA	VN	BE	ES	LT	PT	
AI	BB	BS	CN	DZ	GH	HU	JO	KZ	MK	NA	PE	RO	SV	TZ	VI	AT	EE	LI	NL	
AG	AW	BR	CM	DO	GG	HR	JE	KY	MH	MY	PA	QA	SE	TW	VG	AE	DE	IT	MT	XK

■ 79% (111 countries): 0: No  
■ 21% (30 countries): 1: Yes

**Figure 3. Bearer Shares (ID 172)**



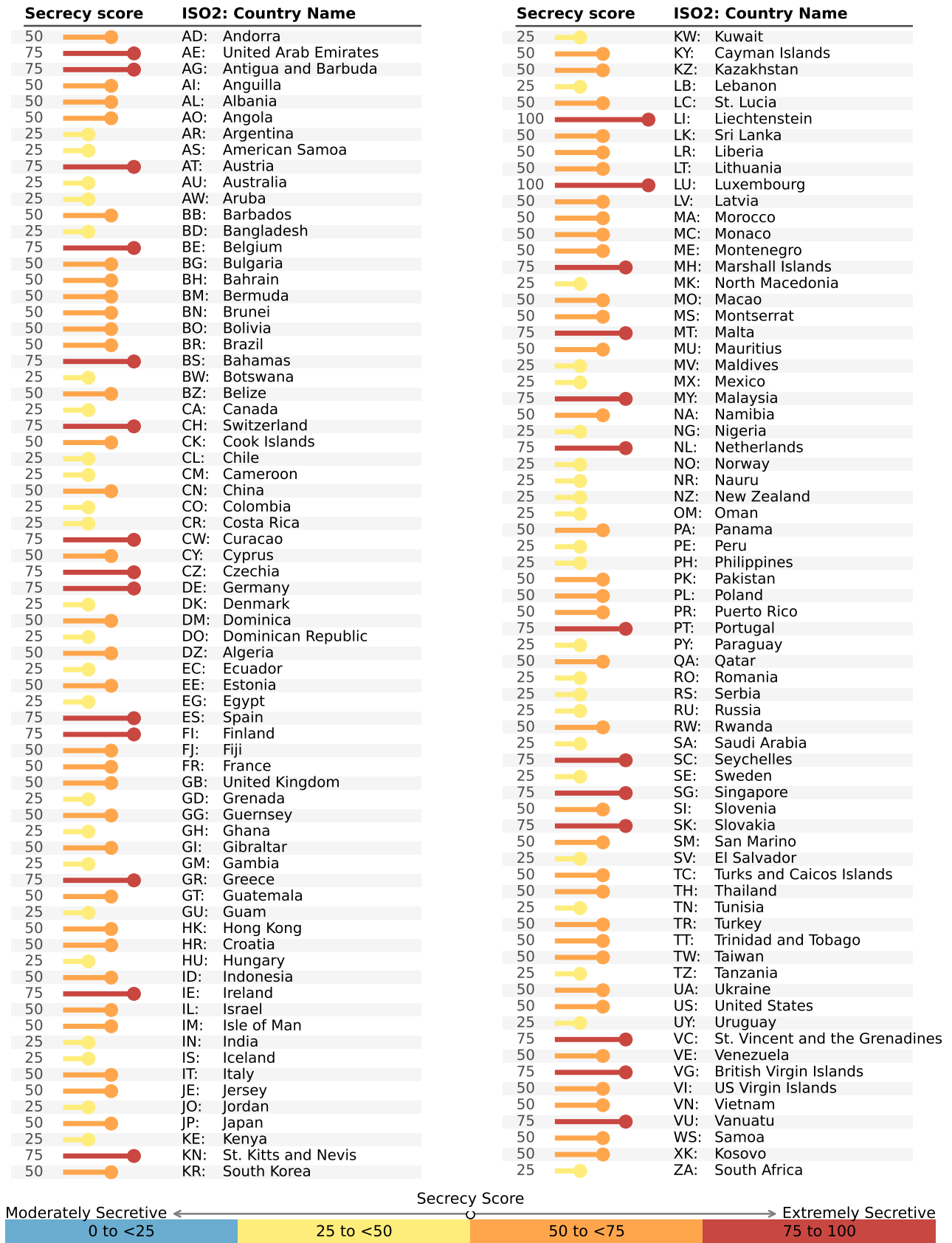
**Figure 4. Series LLCs/PCCs (ID 184)**



**Figure 5. Prohibition of Trusts with Flee Clause (ID 224)**



**Figure 6. Harmful Structures: Secrecy Scores**



## Endnotes

1. Bearer shares are shares which are not registered, where the owner can be any person physically holding the share certificate and where the transferring of the ownership involves only delivering the physical certificate.
2. We consider that the obligation to register bearer shares exists when legal provisions establish a timeframe for immobilisation/registration of all existing bearer shares before the next publication of the Financial Secrecy Index and where the consequence for non-compliance is the loss of those shares. Provisions where the only consequence of non-compliance is the loss of voting rights or rights to dividends are not considered to be sufficient because this would involve the mere suspensions of rights. In such case, the holders of bearer shares may still transfer those shares or avoid identification until they intend to regain their rights. The same applies if there is no deadline to immobilise bearer shares, or where after the deadline holders of bearer shares are still allowed to recover their shares or rights after applying to a court or disclosing their names to the company. This is treated as an unacceptable suspension of rights, rather than the cancellation that this indicator requires.
3. The Global Forum peer reviews refer to the peer review reports and supplementary reports published by the Global Forum on Transparency and Exchange of Information for Tax Purposes. They can be viewed at:<sup>38</sup>
4. Tax Justice Network. *TJN Survey*. 2021. URL: <http://fsi.taxjustice.net/fsi2022/TJN-Survey-2021.pdf> (visited on 11/05/2022).
5. FATF and MENAFATF. *Money Laundering Through the Physical Transportation of Cash*. 2015. URL: <https://www.fatf-gafi.org/publications/methodsandtrends/documents/ml-through-physical-transportation-of-cash.html> (visited on 06/04/2022).
6. European Police Office's Financial Intelligence Group. *Why Is Cash Still King?* 2015. URL: <https://www.europol.europa.eu/sites/default/files/documents/europolcik%20%281%29.pdf> (visited on 06/04/2022).
7. Peter Sands. 'Making It Harder for the Bad Guys: The Case for Eliminating High Denomination Notes' 2016. URL: <https://www.hks.harvard.edu/sites/default/files/centers/mrcbg/files/Eliminating%20BHDNfinalXYZ.pdf> (visited on 06/04/2022).
8. FATF and MENAFATF, *Money Laundering Through the Physical Transportation of Cash*, p. 30.
9. Michael Holden. 'UK Stops Selling 500 Euro Notes over Crime Fears'. *Reuters* (May 2010). URL: <https://www.reuters.com/article/uk-britain-euro-idUKTRE64C1JN20100513> (visited on 06/04/2022).

10. Sands, 'Making It Harder for the Bad Guys: The Case for Eliminating High Denomination Notes', p.11, Figure 3.
11. European Police Office's Financial Intelligence Group, *Why Is Cash Still King?*, p.7, 49.
12. Sands, 'Making It Harder for the Bad Guys: The Case for Eliminating High Denomination Notes', p.12.
13. Dominic Casciani. 'Why Criminals Love the 500 Euro Note' (May 2010). URL: <http://news.bbc.co.uk/2/hi/8678979.stm> (visited on 06/04/2022); Serious Organised Crime Agency. *Annual Report and Accounts*. 2010. URL: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/247328/1241.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/247328/1241.pdf) (visited on 06/04/2022).
14. Serious Organised Crime Agency, *Annual Report and Accounts*.
15. European Police Office's Financial Intelligence Group, *Why Is Cash Still King?*, pp.16, 49.
16. European Police Office's Financial Intelligence Group, *Why Is Cash Still King?*, p.20.
17. European Central Bank. *ECB Ends Production and Issuance of €500 Banknote*. May 2016. URL: <https://www.ecb.europa.eu/press/pr/date/2016/html/pr160504.en.html> (visited on 06/04/2022); *Old Euro Banknotes, Are They Still Valid, Till When, How to Exchange? | Winngie*. URL: <https://winngie.com/2019/12/08/old-euro-banknotes-are-they-still-valid-till-when-how-to-exchange/> (visited on 08/04/2022).
18. National Crime Agency. *National Strategic Assessment of Serious and Organised Crime*. 2017. URL: <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/32-national-strategic-assessment-of-serious-and-organised-crime-2017/file> (visited on 06/04/2022).
19. Monetary Authority of Singapore. *Circulation Currency: Notes*. URL: <https://www.mas.gov.sg/currency/circulation-currency/circulation-currency-notes> (visited on 08/04/2022).
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22. Bank of Canada. *Bank of Canada to Stop Issuing \$1000 Note*. May 2000. URL: <https://www.bankofcanada.ca/2000/05/bank-canada-stop-issuing-1000-note/> (visited on 06/04/2022); Adrian Humphreys. 'The Hunt for Canada's \$1,000 Bills: There Are Nearly a Million Left, Most in the Hands of Criminal Elites'. *National Post* (Nov. 2012). URL: <https://nationalpost.com/news/canada/the-hunt-for-canadas-1000-bills-there-are-nearly-a-million-left-most-in-the-hands-of-criminal-elites> (visited on 06/04/2022).
23. Mark Montgomery. 'Old Canadian Banknotes Lose Legal Tender Status' (Jan. 2021). URL: <https://www.rcinet.ca/en/2021/01/05/old-canadian-banknotes-lose-legal-tender-status/> (visited on 12/05/2022).
24. Arun Jaitley. *Reonetisation Process Almost Complete*: 2017. URL: <https://timesofindia.indiatimes.com/business/india-business/reonetisation-process-almost-complete-arun-jaitley/articleshow/57190069.cms> (visited on 06/04/2022).

25. Sands, 'Making It Harder for the Bad Guys: The Case for Eliminating High Denomination Notes'.
26. Financial Action Task Force. *International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation. The FATF Recommendations (2012 - Updated 2022)*. Paris, Mar. 2022. URL: <https://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF%20Recommendations%202012.pdf> (visited on 15/04/2022), p.118.
27. Emile Van der Does de Willebois et al. *The Puppet Masters. How the Corrupt Use Legal Structures to Hide Stolen Assets and What to Do About It*. 2011. URL: <https://star.worldbank.org/sites/star/files/puppetmastersv1.pdf> (visited on 08/05/2022), p.154.
28. Van der Does de Willebois et al., *The Puppet Masters. How the Corrupt Use Legal Structures to Hide Stolen Assets and What to Do About It*, pp.42-43.
29. Financial Action Task Force, *International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation. The FATF Recommendations (2012 - Updated 2022)*, pp. 91-96.
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33. This assumes a cost of setting up the master LLC of 750 US\$, plus 50 US\$ per series/cell..<sup>39</sup>
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35. Andres Knobel. *Beneficial Ownership in the Investment Industry. A Strategy to Roll Back Anonymous Capital*. 2019. URL: <https://www.taxjustice.net/wp-content/uploads/2019/10/The-transparency-risks-of-investment-entities-working-paper-Tax-Justice-Network-Oct-2019.pdf> (visited on 03/05/2022).
36. For a comprehensive introduction to trusts and their associated risks, please read..<sup>40</sup>
37. An example of a flee clause reads as follows: "The assets will [...] be removed to a separate foreign jurisdiction which is deemed suitable for maintaining investments. At the same time, the individual domestic trustee would resign (subject to reinstatement by the foreign trustee) and, under the terms of the trust agreement, the foreign trustee would be unable to comply with any instructions as may be communicated by the grantor or trust protector (if given under duress)... in the event of a creditor's claim, the assets of the foreign trust will have become so undesirable to the creditor (in terms of the cost of pursuing an action in one or more foreign jurisdictions, with limited expectations for a favorable result), that the creditor will have the incentive to settle the matter for a

much-reduced sum. When the threat of creditor claims has subsided, the design would revert to the original structure in order to again provide the client with direct access to the trust income and principal as a trust beneficiary”.<sup>41</sup> A similar scheme was described in.<sup>42</sup>

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