

November 17, 2015

# LIFE INSURANCE AND THE INTERNATIONAL CLIENT

## GOLDENZWEIG MEMORIAL LECTURE

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# Overview

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- Off Shore
- On Shore



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## Off Shore

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- No U.S. tax Nexus
- Foreign insurer
- Usually borrowed funds
- Different product economics
  - Compared to what?



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# What stands between an insurance idea and its realization?



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# Underwriting

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# Background

Memo to Underwriter with all known:

- Reason for insurance



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# Underwriting Process



- Known
- Known / Unknown
- Unknown / Unknown



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# Background

## On Insured

- Business
- Other assets and source
- Political connections
- Travel and residence
- Source of premium
- Medical records
- Financial statements
- Links to publicly available records

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- Connection to U.S. interests





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## On Shore

- U.S. Owner / Tax I.D. #
- U.S. Funds / Traced to source
- Borrowed funds as premium prohibited
- No political risk
- Only approved countries
- Only approved cities in approved countries



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# Background

## Direct / Indirect Beneficiaries

- Relationship
- Political connections
- Links to publicly available records



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Knowing underwriting  
requirements  
is critical



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INTERNATIONAL INSURANCE PRODUCTS DOMESTIC CARRIER GUIDELINES

Table with 4 columns: Pacific Life, Prudential, Nationwide, TCI Life. Rows include: Individual Characteristics, Termination, Satisfaction, Policy Delivery, Renewal, Tax Treatment, Premium Payments, Federal Compliance, Premiums Available, Minimum Face Amount, Other Requirements and Restrictions, Underwriting Classification, Status of Proposed Insured, and Any Considerable Details.

This carrier(s) is held in compliance (based on each shipment carrier) with a WFOB or WFOB and account. All underwriting choices of policy to all underwriting rules of each shipment carrier(s). Revised 9/13

INTERNATIONAL INSURANCE PRODUCTS DOMESTIC CARRIER GUIDELINES

Table with 3 columns: Voya, John Hancock, Lincoln Financial Group. Rows include: Individual Characteristics, Termination, Satisfaction, Policy Delivery, Renewal, Tax Treatment, Premium Payments, Federal Compliance, Premiums Available, Minimum Face Amount, Other Requirements and Restrictions, Underwriting Classification, Status of Proposed Insured, and Any Considerable Details.

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Requirements



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UNLESS...

Some of the requirements  
are not actually **REQUIRED**



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Unknown

Known

Thomas Mangold, Sept 17 2010



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# Medical Records



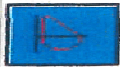
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Clear

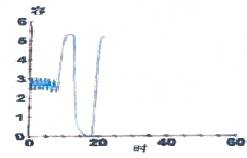
### 威海市立医院 肺功能报告

03

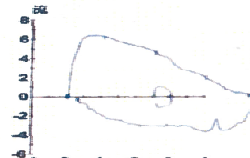
性别: 男                      身高: 182 cm                      科别: 门诊  
 年龄: 40 岁                      体重: 80.0 Kg                      住院号:  
 诊断: 咳嗽待诊                      吸烟史: 无                      检查日期: 2011 07 15



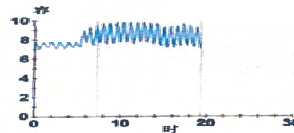
肺容积:		(BTPS)	预计值:	实测1	实测1/预	实测2	实测2/预	改善
肺活量:	VC	升	5.21	5.42	104			
潮气量:	Vt	升		0.65				
深吸气量:	IC	升		2.89				
补呼气量:	ERV	升		2.46				
残气:	RV Sb	升	2.15	2.11	98			
功能残气量:	FRC N2	升	4.06					
肺总量:	TLC Sb	升	7.37	7.27	99			
残气/肺总量:	RV/TLC Sb%	%	30	29				
<b>通气功能:</b>								
用力肺活量:	FVC	升	5.21	5.42	104			
用力呼气一秒量:	FEV1	升	4.18	4.09	98			
用力呼气一秒率:	FEV1/FVC %	%	82	76				
用力呼气中期流速:	FEF25-75% L/sec	L/sec	4.57	3.56	78			
25%用力呼气流速:	FEF25% L/sec	L/sec	8.97	6.07	68			
50%用力呼气流速:	FEF50% L/sec	L/sec	5.44	4.34	80			
75%用力呼气流速:	FEF75% L/sec	L/sec	2.24	2.02	90			
峰值流速:	PEF	L/sec	9.72	6.42	66			
每分静息通气量:	VE	升/分	6.2	32.0	514			
最大自主通气量:	MVV	升/分	171	172	100			
<b>弥散功能</b>								
CO弥散量:	DLCO	mL/mmHg/min	28.4	41.5	146			
肺泡容积:	DLCOexh	mL/mmHg/min	28.4					
	VA	升		7.27				
弥散常数:	VA exh	升						
	DLCO/VA	mL/mHg/min/L	4.34	5.72	132			
	DLexh/VA	mL/mHg/min/L	4.34					



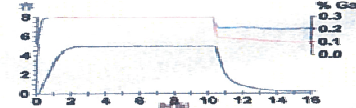
肺容积  
结论:



流速-容量曲线



肺通气量



肺泡弥散

报告医生:

操作者:





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Clearer

XS-800i		威海市立医院检验报告单									
[REDACTED]		病案号:	05687677	样本编号 26							
性别	男	科别	呼吸科	送检时间		2011-07-15 09:32					
年龄	41岁	送检样本	全血	备注							
序号	中文名称	英文名称	结果	单位	参数	序号	中文名称	英文名称	结果	单位	参数
1	白细胞数	WBC	7.8	$\times 10^9/L$	4-10	21	单核细胞总数	MONO	0.7	$\times 10^9/L$	0.12-0.8
2	血红蛋白	HGB	151	g/L	110-160	22	大血小板比半	P-LCR	22		13-43
3	中性粒细胞百分	NEUT%	68.7	%	50-70	23	红细胞数	RBC	4.44	$\times 10^{12}/L$	3.5-5.5
4	红细胞压积	HCT	42.9	%	37-50	24	血小板压积	PCT	0.23	mL/L	
5	淋巴细胞百分	LYM%	21.0	%	20-40	25	血沉	ESR	拒绝抽血	mm/h	男1-15女
6	红细胞平均体	MCV	97	fL	80-94						
7	嗜酸性粒细胞	EO%	1.7	%	0.5-5						
8	平均血红蛋白	MCH	34	pg	26-32						
9	嗜碱性粒细胞	BASO%	0.10	%	0-1						
10	平均血红蛋白	MCHC	352.0	g/L	320-360						
11	单核细胞百分	MONO%	8.50	%	3-8						
12	红细胞分布宽	RDW-SD	41.3	fL	37-54						
13	中性粒细胞总	NEUT	5.3	$\times 10^9/L$	2-7						
14	红细胞分布宽	RDW-CV	12	%							
15	淋巴细胞总数	LYM	1.6	$\times 10^9/L$	0.8-4						
16	血小板数	PLT	244	$\times 10^9/L$	100-300						
17	嗜酸性粒细胞	EO#	0.13	$\times 10^9/L$	0.05-0.5						
18	血小板分布宽	PDW	10.3	fL	9-17						
19	嗜碱性粒细胞	BASO#	0.01	$\times 10^9/L$	0-0.1						
20	平均血小板体	MPV	9.6	fL	9-13						



此报告只对本样本负责 报告时间 2011-07-15 09:35 检验者 彤斌 审核者 彤斌



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...looks healthy to me!



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# Financial Matters



# Financial Data

Structure designer (1 - [redacted]) - Row name: 货币资金, Row definition: BS

File

Tree control:  Check:  Simulate:

Row definition: **BS** Name: **Balance Sheet**

**Designer** Setup

Create  
Edit  
Delete  
Copy  
Move

Company  
资产负债表 -  
资产 - 资产  
流动资产 - 流动资产  
**货币资金 -**  
短期投资 -  
应收票据 -  
应收账款 -  
预付账款 -  
应收股利 -  
应收利息 -  
其他应收款 -  
存货 -  
原材料 -  
其他流动资产 -

**General** Setup Special report

Row name: 货币资金  
Row description:  
Print name: %NAME  
Print description: %DESCR  
Type: **Dimensi**



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# Comments on Planning Examples



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## Case 1

- Italian, French citizens
- UK residence
- Off-shore PPVA
- In-kind premium to acquire joint and survivorship PPVA
- Limited market



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## Case 2

- Swedish, Norwegian citizens
- Children U.S. Persons for tax
- Substantial trust UNI
- On-shore, domestic product
- Western country and citizens
- No problem



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## Case 3

- South African citizen
- Foreign national trust
- Convert to U.S. trust
- Buy life insurance





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YIPPEE!



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\$30M – No problem

\$100M – Capacity issues

Reinsurance management



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# Summary

With work and a little luck...

