



2017 Offshore banking report includes information on financial institutions globally suited for offshore personal and business banking.

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## Introduction

Without a doubt, offshore banking and how and where to open an offshore bank account is one of the most discussed, yet misinformed topics on the internet related to this industry.

We at GWP have spent years researching and digging into this topic. In the offshore company and offshore banking field, this is also a topic that remains in a constant state of change.

Since the full implementation of FATCA and the scandal outed with the Panama Papers, offshore banking continues to be a moving target. This report is up to date for the 2016 and 2017 year, and we will be updating this at least once per year (\*disclaimer: due to changes in the industry, the information in this report may also change mid-year).

For some background, FATCA has effectively made every bank in the world the enforcement division of the US Treasury Department and thus the IRS.

We frequently hear non-US clients that claim FATCA does not affect them since they are not Americans. This cannot be further from the truth.

FATCA affects every bank in the world that chooses to conduct business in US Dollars and thus affects every person who has a bank account in a bank that conducts business in US dollars.

Furthermore, it affects anyone who banks with any bank that

conducts business with any bank that transacts in US Dollars. Confused yet? Basically, every bank in the world is subject to FATCA so it affects anyone who has a bank account.

To simplify, the way it works is that any bank in the world that sends or receives wire transfers in US Dollars, must do so using the SWIFT system.

For a bank to access the SWIFT system, there must be a primary or a correspondent bank in the US that can facilitate wire transfers in US Dollars.

For example, a bank in Abu Dhabi wishing to send a \$100,000 wire to a bank in Brazil, must send the US Dollar wire through a US bank like Wells Fargo, for example. In the example, Wells Fargo acts as the correspondent bank to facilitate the wire from the Abu Dhabi bank to the one in Brazil.

FATCA requires every bank in the world that conducts business in US Dollars be FATCA compliant. If the US Treasury department requests information from the bank in Abu Dhabi about all accounts related to US persons, the bank in Abu Dhabi must comply.

If the bank in Abu Dhabi refuses to comply, then there are essentially two options: 1. The US Treasury Department instructs Wells Fargo to end its banking relationship with the bank in Abu Dhabi therefore excluding the bank from the SWIFT system and making it impossible to conduct business in US Dollars; or 2. The US Treasury Department instructs Wells Fargo to withhold 30% of the value of the wire from the Abu Dhabi bank before further wiring the balance to the bank in Brazil.

Neither option is good for the bank in Abu Dhabi, or for the transacting parties. This also creates additional administrative costs to every bank in the world to fulfill mandatory FATCA compliance. And this cost is passed down to their clients in the form of lower interest rates or higher fees.

I wanted to give you some background because FATCA has effectively changed the way banking functions. It has also forced banks around the world to change and adapt - sometimes every couple of months. It creates a moving target that we at GWP closely monitor and work hard to provide the most relevant, up-to-date information.

With that said, we have several banking recommendations for a variety of circumstances. Provided are highlights and contact details for each bank as well as my opinion on the benefits of each bank. I will also advise whether a personal visit to the bank is required and if the bank accepts US persons as clients.

The banks are categorized by traditional bank, offshore bank, and fintech platform. Each will be explained by category

## **FinTech Platform**

*According to Wikipedia, “Financial technology, also known as FinTech, is an industry composed of companies that use new technology and innovation to disrupt the marketplace of traditional financial institutions and intermediaries in the delivery of financial services.”*

This is becoming a hot new industry which encompasses financial

service providers who leverage the latest technology for solving problems in an otherwise mostly archaic industry. There are many examples of FinTech disrupting the financial services industry. For example, Bitcoin and other cryptocurrencies fall into this category. The very existence of digital currencies has created massive disruption, but the ecosystem that has sprung up and evolved around these digital currencies is astounding.

Another example would be the P2P (peer-to-peer) lending platforms. They effectively take the bank out of the lending picture by connecting borrowers directly to investors. This allows investors to diversify their risk across a wide loan portfolio.

This is just a small sample of some other FinTech that exists. The following lists banks – or pseudo-banks that function as banks – for your daily transactions, or even savings and currency hedging. These players, and others that will inevitably appear like them, are true game-changers in the banking and FinTech world.

### Leupay

Website: [www.LeuPay.eu](http://www.LeuPay.eu)

Available through: Android and Apple play stores

Accounts available: Personal and Business

Number of currencies: 9 currencies.

Accepts Americans as individuals and/or beneficial owners of company.

Account opening in minutes.

Leupay is an e-wallet and payment provider. Banking services are provided by Sata Bank in Malta. As a member of the EU, it has a deposit guarantee of EUR 100,000. You can easily open an account through the website or the app within minutes. In some cases they

require additional information, and may require just a couple of extra days for validation.

The online banking and app are quite user friendly and account opening is simple and fast. You can open accounts personally or for companies, including offshore companies. You can get a debit card, account is free to open, no monthly or annual fees, and wire transfers are competitively priced.

## WB21

Website: [www.WB21.com](http://www.WB21.com)

Available through: Android and Apple play stores

Accounts available: Personal and Business

Number of currencies: 22 currencies.

Accepts Americans as individuals and/or beneficial owners of company.

Account opening in minutes.

WB21 is a payment provider. Banking services are provided by multiple banks in pooled accounts by WB21. WB21 is a Singapore licensed financial service provider and subject to Singapore's deposit insurance scheme of SGD 50,000. You can easily open an account through the website or mobile app in just a few minutes. In some cases they require additional information, and may require just a couple of extra days for validation.

The online banking and app are quite user friendly and account opening is simple and fast. You can open accounts personally or for companies, including offshore companies. Currently WB21 does not offer a debit card, but expects to have that available soon. Account is free to open, no monthly or annual fees, and wire transfers are competitively priced.

## Monese

Website: [www.Monese.com](http://www.Monese.com)

Available through: Android and Apple play stores

Accounts available: Personal only

Currencies available: Accounts in GBP only, with EUR offering expected soon

Accepts anyone with an address in Europe (see special note below).

Account opening in minutes.

Monese is a payment provider. Banking services are provided by multiple banks within Europe in pooled accounts by Monese.

Monese is a UK licensed financial service provider subject to UK's deposit insurance scheme of GBP 75,000. You can easily open an account through their mobile app in just a few minutes. In some cases they require additional information, and may require just a couple of extra days for validation.

The online banking and app are quite user friendly and account opening is simple and fast. You can open personal accounts only. You can get a debit card in GBP. Account opening is free and the monthly fee is GBP4.95. Other banking fees are quite reasonable.

## N26

Website: [www.N26.com](http://www.N26.com)

Available through: Android and Apple play stores

Accounts available: Personal

Currencies available: 19 currencies

Accepts anyone with a German address (see special note below).

Takes minutes to open an account.

This is a German based banking service through Wirecard. As such

every N26 account is guaranteed by the Compensation Scheme of German Banks up to EUR 100.000. Transfers, investments and overdraft are available now, but credit, savings and insurance are in the works and new product offerings. In an effort to keep your banking more simplified, it offers the ability to do a lot from your mobile device. You can manage your overdraft amounts as well as your investment portfolios. It also tracks where your money is being spent: groceries, eating out, entertainment, etc.

The N26 bank account is free to open and free of account management fees. Minimum credit qualifications may apply since there are various account tiers available. They offer a Mastercard affiliated debit card that is directly linked to your N26 account.

### Simple

Website: [www.Simple.com](http://www.Simple.com)

Available through: Android and Apple play stores

Accounts available: Personal only for now

Currencies available: USD only

Accepts anyone with a US address (see special note below).

Takes minutes to open an account.

Simple is a banking service based in the United States. Funds are held by Bancorp Bank or Compass Bank. As such it is insured by the FDIC up to \$250,000. The only fees to look out for could come from VISA if you use the card internationally and an ATM provider outside the network. Simple does not charge its customers any fees.

In an effort to really hone in on personal banking, they offer quite a few features that can be helpful to the mindful consumer. They track spending by category, but you can personalize your spending and savings goals, so rather than offer an “available balance”, as is the

common practice, they offer a “safe to spend” figure that takes into account future bills and savings goals.

## Uphold

Website: [www.Uphold.com](http://www.Uphold.com)

Available through: Android and Apple play stores

Accounts available: Personal or business

Currencies available: 30 currencies and Bitcoin

This is not exclusive to any country.

Takes minutes to open an account.

Uphold is “*the world's fastest growing platform for moving and holding any form of money or commodity, instantly and securely*”.

In short, Uphold is a member based, cloud storage for money. It is not a bank. It does not participate in any fractional reserve banking. It holds a full reserve. Likewise, because it is not a bank, your money is still your money and it is not covered in the event of a loss the same way governments have schemes to insure up to a certain amount.

A few of their interesting perks and features include: low cost currency exchange, global payroll in any of 30 currencies, quick transfer of funds. The benefits have been impressive including facilitating banking for many of the unbanked people in the world through partnerships, volatility protection in economically unstable areas, and savings in costs.

They do not yet offer a debit card directly linked to the member account, but it is an expected future product.

## Transferwise

Website: [www.Transferwise.com](http://www.Transferwise.com)

Available through: Android and Apple play stores

Accounts available: Personal or business

Currencies available: 18 receivable; 20 payable currencies

They can service up to 59 country at this time, but you needn't be a resident of any particular country.

Takes minutes to open an account.

Transferwise is a means of transferring money around the world and is linked to several banks around the world. This is not a bank and does not hold or lend money. It simply is a means of transferring money from country to country for considerably less than a bank would charge. They market themselves as having exchange rates closer to what can be searched online because there aren't a bunch of hidden fees. The account is free to open. The only charges come in the transfers based on exchange rate and varies by currency and country.

## **Offshore Banks**

### [BOSLIL \(Bank of St. Lucia International Limited\)](#)

Website: [www.BOSLIL.com](http://www.BOSLIL.com)

Accounts available: Personal or business

Currencies available: 15 currencies

Accepts American citizens and persons

Located in the British Commonwealth of Saint Lucia, in the Caribbean. Its liquidity is at over 60% and is a subsidiary of East Caribbean Financial Holdings (ECFH). It doesn't lend or engage in derivative schemes.

You can hold your account in any currency you wish. Which means

when the EU institutes charges against EUR accounts, you can avoid that by holding your account in Hong Kong dollars or Australian dollars. Likewise, since the money itself isn't held in St. Lucia per se but rather in a bank partner that handles that currency primarily, getting out of USD gets your money out of US banks. Getting into Norwegian krone puts you in a Norwegian bank that partners with BOSLIL.

They do offer a credit card, but it needs a 125% deposit guarantee, so it's really just a debit card. At GWP, we can assist in opening an account with BOSLIL.

### Loyal Bank

Website: [www.LoyalBank.com](http://www.LoyalBank.com)

Accounts available: Personal or business

Currencies available: multiple

Accepts American citizens and persons

While an in-person consultation is not required, there is an extensive due diligence application process.

Loyal Bank is an internet-based private bank which specializes in wealth management, private banking and investment banking for individuals and corporations.

They have several fees to start an account depending on the features you select and they also have a minimum balance requirement to both open the account as well as maintain the account.

It does not deal in cash or checks and is not yet set up to handle merchant accounts. It only accepts transfers.

Loyal Bank is based out of St. Vincent and the Grenadines and is a constitutional monarchy with the Queen of England technically as its head of state, however, it is not yet regulated by the Financial Conduct Authority of the United Kingdom (the FCA). For this reason the services of the United Kingdom Financial Ombudsman and the Financial Services Compensation Scheme are not available to residents of the United Kingdom who may have an interest in purchasing services or products from Loyal Bank.

At GWP, we can assist in opening an account with Loyal Bank.

### [CSB \(Capital Security Bank\)](#)

Website: [www.CapitalSecurityBank.com](http://www.CapitalSecurityBank.com)

Accounts available: Personal and Business

Currencies available: 25+

Accepts American citizens and persons

CSB is a private bank based out of the Cook Islands. They can open your account in about two days, and you do not have to be physically present to open the account. Their minimum account balance for Americans is \$20,000, and there are a series of fees associated with different services.

The account is covered by Professional Indemnity Insurance, and they are fully compliant with the standards and practices of the financial regulatory regime of the Cook Islands. They do NOT lend against their account holder's funds except collateralized cash. They do not have deposit insurance.

They do offer online banking as well as precious metal accounts, but it does not deal in cash, checks, or merchant accounts, only wire transfer.

At GWP, we can assist in opening an account with CSB.

### Europac Bank

Website: [www.EuroPacBank.com](http://www.EuroPacBank.com)

Accounts available: Personal or business

Currencies available: multiple

Does not accept American citizens and persons either as individuals or beneficial owners of companies

Europac is a full-service bank license in St. Vincent and the Grenadines. They offer both personal and business with multi-currency accounts holding 9 currencies. The bank is a 100% reserve bank offering no leveraged loans.

Europac offers some unique options like Gold-backed deposit accounts, currency and stock trading platforms, and various mutual fund investments.

Accounts can be opened in person or thru phone calls and document delivery. At GWP, we can assist in opening an account with EuroPac Bank.

### Standard Bank

Website: [international.standardbank.com/pbbinternational](http://international.standardbank.com/pbbinternational)

Accounts Available: Personal or business

Currencies Available: 15 currencies (Primarily GBP, USD, EUR, and AUD)

Accepts American citizens and persons

The holding company is based out of Johannesburg, South Africa, but it does have subsidiaries based out of Jersey and Isle of Man

which is subject to those respective insurance schemes. They offer a VISA debit card and online personal banking.

Their Optimum accounts can be set up over the phone or online free of maintenance fees so long as you maintain a minimum account balance of \$6,000. Their fees are relatively in line with others, with perhaps the exception of international transfer fees. While not a consistent requirement, nor visible on their website, it is suggested that there be some connection to Africa to open an account.

### Bank of Valletta

Website: [www.BOV.com](http://www.BOV.com)

Accounts available: Personal and Business

Currencies available: 3 (USD, EUR, GBP)

Accepts American citizens and persons

Based out of Malta, member of the EU, this bank is covered up to EUR 100,000 via the Maltese Deposit Guarantee Scheme.

An in-person visit is required along with due diligence documentation. The requirements are a little stricter the further from Malta you go. Maltese residents and citizens have a rather turn-key application process, EU residents require a little more information, and non-EU residents require a more comprehensive application process (which could take up to six months depending on the efficiency of the banks involved). They offer a debit card and online banking services.

### Butterfield

Website: [www.ButterfieldGroup.com](http://www.ButterfieldGroup.com)

Accounts available: Personal and Business

Currencies available: 13 currencies; USD, GBP, CAD, and BMD

only for checking accounts  
Accepts American citizens and persons

Based in the Bermuda, Americans can maximize international tax benefits. While there is no deposit guarantee offered, their standards and practices are sound and responsible, which is why they have the strong reputation that they do.

The offer chip/pin credit cards and debit cards for personal accounts.

While an in-person visit is not requisite, there is a lot less authentication needed since the bank can verify the identifying information via in-person interview. The same information is required, and it is an extensive amount of disclosure; more than the others on this list. Some questions that stand out are: purpose of the account, nature and dollar volume of anticipated transactions including source of funding/wealth of initial and subsequent deposits.

### Credit Andorra

Website: [www.CreditAndorraGroup.com](http://www.CreditAndorraGroup.com)

Accounts available: Personal and Business

Currencies available: multiple

Accepts American citizens and persons

This private bank is based in the tiny 136 square mile country of Andorra. There is also an office in Panama City, Panama where accounts can be opened.

They offer asset and wealth management and corporate investment banking, sales and trading, structuring and hedging strategies. An in-person meeting is required to discuss goals as well as multiple in-

person visits once the account has been started. They do offer wire transfer services, currency exchange, or liquid accounts with checks, debit cards, or cash withdrawals and deposits.

There is no deposit insurance on their accounts.

## **Traditional Banks**

### Norvik Bank

Website: [www.Norvik.eu](http://www.Norvik.eu)

Accounts available: Personal and Business

Currencies available: multiple (USD, RUB, EUR primarily)

Accepts American citizens and persons

Based in Latvia this bank offers multi-currency banking for personal and corporate accounts. You can get a debit card and qualifying account deposits are insured up to EUR 100,000. Getting started is fairly simple: get in touch with the bank manager, determine which account you are seeking, and send in all necessary documents. For non-Latvian residents, there is an account opening fee that averages around EUR 250.

### Swedbank

Website: [www.Swedbank.ee](http://www.Swedbank.ee)

Accounts available: Personal and Business

Currencies available: Multiple

Accepts American citizens and persons

Swedbank allows multi-currency accounts but anything transactions outside the EUR or USD might incur a 0.5% fee. They offer both corporate and personal accounts as well as debit and credit cards.

If you are not a resident of the Estonia, you will ultimately need to have a face-to-face meeting in a branch. You would first submit all necessary documents and then be notified within 5 business days whether your application is approved via phone or email. Upon approval, an in-person meeting is required to set up the account. There is an account opening fee of EUR 250 for non-Estonian residents.

Eligible deposits are guaranteed up to EUR 100,000.

### Baltikums Bank

Website: [www.Baltikums.eu](http://www.Baltikums.eu) (BlueOrangeBank.com)

Accounts Available: Personal and Business

Currencies Available: Multiple

Accepts American citizens and persons

Based in Latvia, eligible account deposits are insured up to EUR 100,000 and because they are a global company with online banking products, an in-person visit to a branch is not required to start an account. There are account opening fees that range from EUR 400 – 1100.

If you hold over 100,000 CHF, you are subject to a negative interest rate charge of 1.25% which is likely the case in most EU based banks, as well as banks that carry EUR based accounts.

Various card options available, with high levels of protection and several fringe benefits, however severe fees apply to any cash withdrawal.

### ABLV

Website: [www.ABLV.com](http://www.ABLV.com)

Accounts available: Personal and business

Currencies available: EUR, USD (RUB, GBP, CHF are available for “Extra Savings Account” only)

Accepts American citizens and persons

Based in Latvia, eligible deposits are guaranteed up to EUR 100,000. Identifying documents for individual(s) and/or business are required; in-person visit to institution, however, is not required.

Debit and credit cards available as well as online banking products for expats and individual residents.

### TD Bank

Website: [www.TDBank.com](http://www.TDBank.com)

Accounts available: Personal, small business, and commercial

Currencies available: Multiple (typically for commercial depositors)

Accepts American citizens and persons (based in the US and Canada)

Various online banking services and products, including debit cards, bill pay, and currency exchange.

Securities and investments are not FDIC insured, but bank deposits are FDIC insured up to \$250,000. In-person branch visit is not necessary to start an account; in fact, online promotions to start an account are available.

Non-US or Canadian residents can also open an account with TD Bank, but will need to bring two forms of official identification with them to an in-person branch meeting.

## Special Notes

As noted earlier, there are some certain circumstances where you may be required to have an address in a certain country or region.

For example, N26 requires you to have a German address for a full access account.

Or Simple and TD Bank will require you to have a US address for account opening there.

In these cases, it is possible to “create” the appearance of residency in those jurisdictions using mail drop addresses that provide you with a physical address in the jurisdiction where you require an address.

For anywhere in the US, we recommend using [Traveling Mailbox](#). [Traveling Mailbox](#) is a great service that will give you a physical address in a US state of your choice (of their available options) that appears like an apartment or flat.

[Traveling Mailbox](#) will receive all of your physical mail and packages, scan and email your mail to you, and forward any mail or packages you wish to receive directly.

This is a great option if you must show a physical address in the US as it appears as a residential address, plus you have the added benefit of being able to use it for receipt of mail and packages. For any digital nomads, expats or frequent travelers, this is a very handy service.

Once you have the [Traveling Mailbox](#) address, you would then

change your mailing address with your banks, credit card companies, etc. to show this as your residential address.

For the purposes of this report, you would use the [Traveling Mailbox](#) address for opening a bank account.

If you require an address for the same purpose in other parts of the world like Germany and all Europe, a great option would be [ClevverMail](#).

[ClevverMail](#) works just like [Traveling Mailbox](#), but with a few additional features. For the purpose of this report, the other features are not relevant, but feel free to peruse their site to see if they can offer something for you and your business.

## **Peer-to-Peer Lending Platforms (P2P)**

This section is just a little bonus for those of you looking to earn some additional return on your offshore cash.

If you are not familiar with P2P, it is quite simple. P2P essentially eliminates the bank as the middle man to facilitate loans.

These are all FinTech platforms that have filled a gap where banks have failed. Many borrowers seek loans for a variety of reasons that fall outside the scope of traditional banking.

For example, let's say you want to buy an 8 year old car. Most banks won't loan you money on a car older than 5 years so you are stuck with borrowing from friends or saving up and paying cash.

Or maybe you need to renovate your kitchen, but cannot find a bank

willing to give you a small, real estate backed loan.

P2P FinTech platforms have solved this problem by connecting borrowers, to investors who are looking for outsized returns. In absence of the bank to facilitate these loans, the majority of the yield is paid to the lender, instead of the bank.

In addition, the P2P platforms allow you to spread you risk across multiple loans, multiple asset types, multiple countries and even multiple currencies.

Below is a list of three P2P platforms we can recommend.

### Mintos

Website: [www.Mintos.com](http://www.Mintos.com)

Loan types: auto, personal, mortgage, business, invoice, agricultural  
Buyback guarantee available on some loan types

Yield: 10-15%

Mintos is a unique P2P FinTech platform based in Latvia. They operate as a marketplace for various loan originators to “sell” their loans to investors in small pieces. This means they are selling existing funded loans by loan originators that have been in the business of making loans for many years.

Mintos works with several loan originators in Estonia, Latvia, Lithuania, Russia, Georgia, Poland and Czech Republic to offer their loans to thousands of registered investors on the platform.

### Twino

Website: [www.Twino.eu](http://www.Twino.eu)

Loan types: Unsecured consumer loans

Buyback guarantee on all loans over 60 days late, including interest  
Yield: 10-15%

Twino works exclusively in the consumer loans section. The company started as a consumer loan company and created the P2P marketplace in 2015 to make loans available to investors thru a simple, transparent platform. It also allowed additional liquidity to Twino to make more loans.

Twino originates loans in Latvia, Czech Republic, Poland, Russia, Georgia, Denmark, Mexico, Spain and Kazakhstan.

### Savy

Website: [www.GoSavy.com](http://www.GoSavy.com)

Loan types: Unsecured consumer loans

No buyback guarantees

Yield: ~25%

Savy is purely a consumer loan marketplace based out of Lithuania. They specialize in highly transparent consumer loan investments and use a 3<sup>rd</sup> party payment provider to aid in transparency for both lenders and borrowers.

## **Summary**

To summarize, the world of banking and finance is changing. FATCA has changed the world of banking and finance and luckily entrepreneurs around the globe have leveraged ingenuity and technology to solve many of the problems that persist.

FinTech is a fast growing segment of finance and will continue to

grow and expand at a rapid pace.

For those of you interesting in diversifying your wealth geographically, I would consider opening at least one account with the FinTech banking options like Leupay or WB21 immediately.

This will help you “get your feet wet” in the FinTech world as well as help you diversify some of your cash offshore in a jurisdiction outside your home country.

If you want to take the FinTech test a step further, invest some money in one of the P2P lending platforms mentioned and watch your wealth grow passively.

I also listed many offshore and traditional banking options for you and your business. These are all excellent options, with some more relevant to your needs than others based on your specific situation.

BOSLIL has proven to be an excellent option for our clients for their daily transactional banking. EuropacBank has been exceptional for our non-American clients both as a transactional bank and for investment options.

Each of the financial institutions mentioned has its own merit. Please research each one to find what works best for your own situation. Until next time, live well.