

Typical x-border cases at the PB – LIE-Foundation

POELLATH IAP Private Clients 2026 May 28-30, 2026

Yannick Stehr
MANAGING DIRECTOR

Wealth Advisor
Tel: +49 69 7124 1265
E-Mail: yannick.m.stehr@jpmorgan.com

Richard Becker
EXECUTIVE DIRECTOR

Client Advisor
Tel: 069 7124 1624
E-Mail: richard.becker@jpmorgan.com

Moritz Bellgardt
VICE PRESIDENT

Wealth Advisor
Tel: +49 69 7124 1542
E-Mail: moritz.bellgardt@jpmorgan.com

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Introduction to J.P. Morgan Private Bank

Access to a global leader

You have access to our dedicated, multidisciplinary team, as well as to some of our global, institutional-level resources across JPMorgan Chase & Co.

JPMORGAN CHASE & Co.

J.P.Morgan

CHASE 

ASSET & WEALTH MANAGEMENT

ASSET MANAGEMENT

WEALTH MANAGEMENT

Comprehensive wealth management and investment intelligence for individuals, families and businesses.

COMMERCIAL & INVESTMENT BANK

Combines Global Investment Banking, Commercial Banking, and Corporate Banking, as well as Markets and Securities Services and Global Payments, serving clients of all sizes globally – from mid-market companies to large multinational corporations.

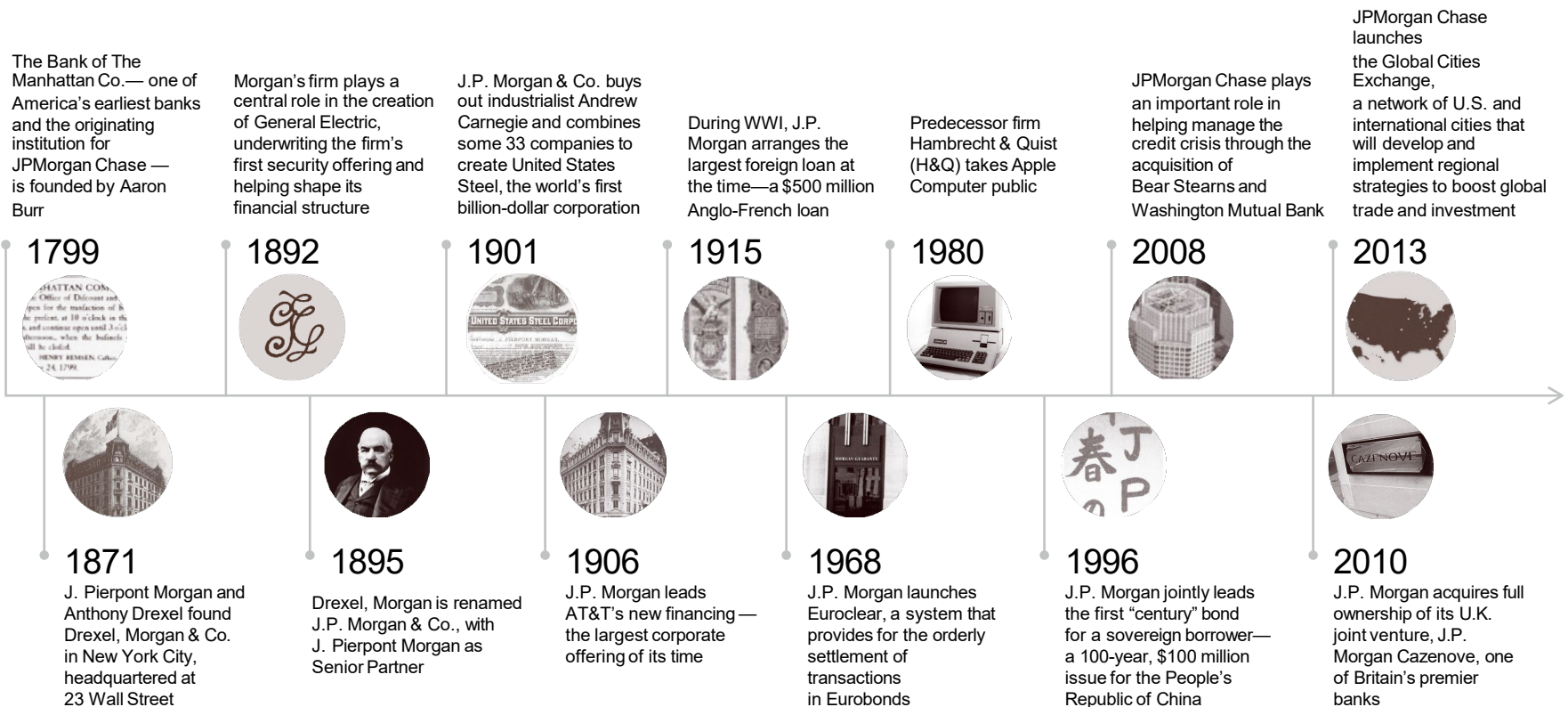
CONSUMER & COMMUNITY BANK

Consumer banking, business banking, wealth management, card services, and auto and mortgage banking for individuals and small businesses.

Source: JPMorgan Chase.

Leadership over decades

Over 200 years of visionary financial leadership in advising individuals and families across generations



Source: JPMorgan Chase, December 2022.

Global reach, local presence

NORTH AMERICA

Arlington
Atlanta
Austin
Baltimore
Baton Rouge
Birmingham (MI)
Boca Raton
Boston
Charlotte
Chicago
Cincinnati
Cleveland
Columbus
Dallas
Denver
Fort Worth
Grand Rapids
Greenwich
Houston
Indianapolis
Jacksonville
Las Vegas
Los Angeles
Miami
Midland
Milwaukee
Minneapolis
Naples
Nashville
New Orleans
New York
Northbrook
Oklahoma City
Orange County
Orlando
Palm Beach
Palo Alto
Philadelphia
Phoenix
Pittsburgh
Princeton
Raleigh
Rochester
Salt Lake City
San Antonio
San Diego
San Francisco
Sarasota
Scottsdale
Seattle
St. Louis
Summit
Tampa
Tulsa
Washington, D.C.
Westlake Village

LATIN AMERICA

Belo Horizonte
Bogotá
Campinas
Curitiba
Lima
Mexico City
Porto Alegre
Rio de Janeiro
Santiago
São Paulo

EUROPE AND MIDDLE EAST

Amsterdam
Athens
Brussels
Copenhagen
Dubai
Frankfurt
Geneva
Hamburg
London
Luxembourg
Madrid
Manchester
Milan
Munich
Paris
Stockholm
Zurich

ASIA

Hong Kong
Singapore
Sydney

\$3,5B+

PRIVATE BANK
CLIENT ASSETS¹

1000+

EMPLOYEES BASED IN
FRANKFURT FOR
J.P. MORGAN

4.101+

CLIENT ADVISORS
WORLDWIDE IN 19
COUNTRIES²

\$5M

EXPENDITURE FOR
CHARITABLE PURPOSES
IN GERMANY

2024

THE WORLD'S BEST
PRIVATE BANK
(Euromoney)³

2023

BESTE INTERNATIONAL
PRIVATE BANK GERMANY
(Euromoney)⁴

¹ Source: J.P. Morgan Quarterly Report Q4 2025.

² As of: Dezember 2025.

³ Euromoney's Private Banking Awards 2024, March 2024 "World's Best Private Bank 2024".

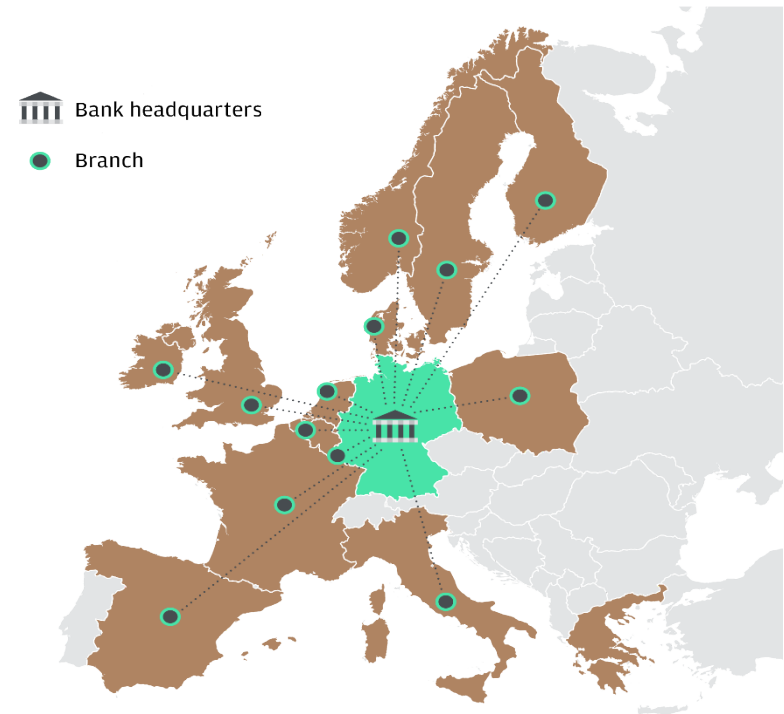
⁴ Euromoney's Private Banking Awards 2023, March 2023 "World's Best Private Bank 2023" and „Germany's Best International Private Bank 2023“.

J.P. Morgan SE

A cohesive, pan-European entity headquartered in Frankfurt

OVERVIEW

- J.P. Morgan SE is, measured by total assets, the **fifth largest bank in Germany and one of the 20 largest banks in the EU supervised by the ECB.**
- Private customers within EMEA (Europe, Middle East & Africa) benefit from a **robust financial structure** with a total capital base of approx. EUR 42 billion.
- Long-term **issuer rating**¹ :
Moody's: Aa3 / S&P: AA- / Fitch: AA
- Under the JP Morgan SE, **several business areas** (CIB, Commercial Bank, Private Bank, etc.) are combined.
- **~5.200 Mitarbeiter** at over **fifteen locations.**
- J.P. Morgan's clients are in addition to the **statutory deposit protection** (€100,000 per customer) insured; J.P. Morgan SE is also a member of the JP Morgan SE secured in the **voluntary deposit protection fund.**



METRICS²



20.0%
Core Capital Ratio (CET1)



€23.9 Bn.
Core Capital (CET 1)



€448.6 Bn.
Total Assets



144%
LCR

¹ Issuer rating as of December 31, 2024. Source: Bloomberg Finance L.P.

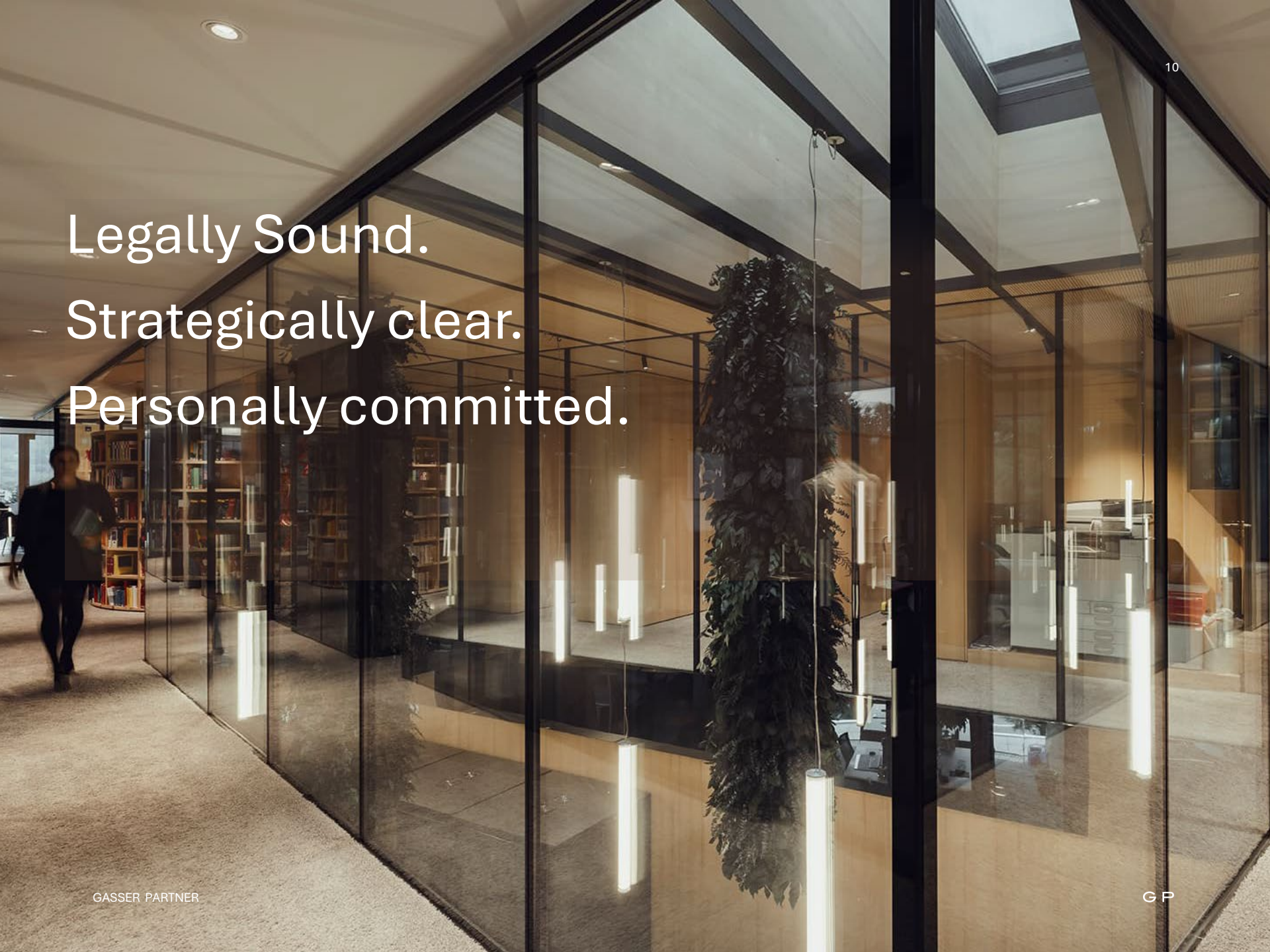
² Source: JPMSE 2024 Annual Report. Please refer to the important information on deposit protection at the end of the presentation. For illustrative purposes only.

Introduction to
Gasser Partner Attorneys at
Law

GASSER PARTNER

Excellence That Earns Trust

Delivering sophisticated legal and fiduciary solutions to international private clients, family offices and businesses in Liechtenstein and internationally.



Legally Sound.
Strategically clear.
Personally committed.

Performing internationally

Excellence That Earns Trust.



Office Zurich

Beethovenstrasse 19
8002 Zurich
Switzerland
T +41 58 404 55 40
office@gasserpartner.com



Office Schaan

Feldkircher Strasse 31
9494 Schaan
Liechtenstein
T +423 236 30 80
office@gasserpartner.com



Office Vienna

Tuchlauben 3
1010 Vienna
Austria
T +43 1 310 33 11
office@gasserpartner.com

Our Identity

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Our Firm at a Glance.

Our Footprint

One of Liechtenstein's leading law firms

Headquarters: Schaan, Liechtenstein

Offices: Zürich (Switzerland), Vienna (Austria)

International Network: Strong international connections and cross-border capabilities

Our Expertise

Private Clients, Estate Planning & Asset Protection

Banking & Financial Markets Law

Corporate, Foundation and Trust Law

Dispute Resolution

Our Capabilities

A team of over 30 lawyers with diverse backgrounds

Modern infrastructure supporting efficient and secure client work

International experience at partner and associate level

Broad practice coverage

Personal, responsive client service

3 Uncertain Times

German resident individual would like to move abroad / secure assets

CASE

- Founders partially sold the company and are hesitant to have the entire liquid wealth in Germany
- Fear of inheritance and/or wealth tax
- **Geopolitical risks**
- Place where the family would feel comfortable in case of needing to leave Germany/Europe

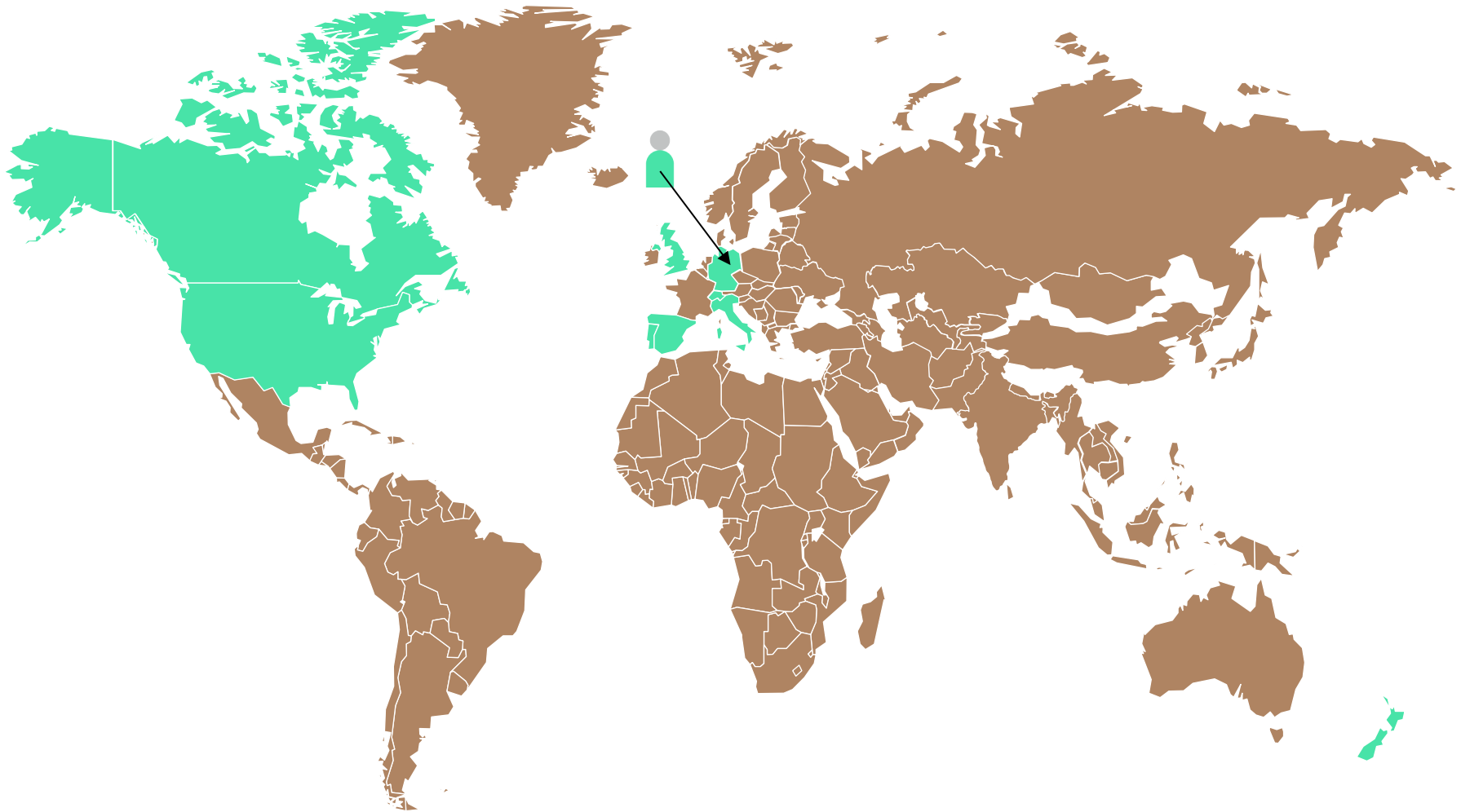
QUESTIONS THAT CAME UP/ACTIONS TAKEN AT PRIVATE BANK-LEVEL

- **Define and precise the worries**, e.g. skepticism about Germany or Europe in general? (political vs. economic vs. geopolitical reasons)
- What are typical dooms day **currencies**? And how can you invest in those currencies?
- Which **countries** could be an alternative to live in? (multiple aspects to consider) → if requested: recommendation of reputable tax lawyers from our network, e.g. Poellath
- **Share experiences** of other clients
- Offer **international account set-up** (RND accounts (coming to an end..), US-account)
- **White papers** with country information (“moving to ...”, “buying real estate in....”)

Source: J.P. Morgan Private Bank.

German resident individual would like to move abroad / secure assets

DESTINATIONS THAT ARE OFTEN IN THE HEAD OF OUR CLIENTS

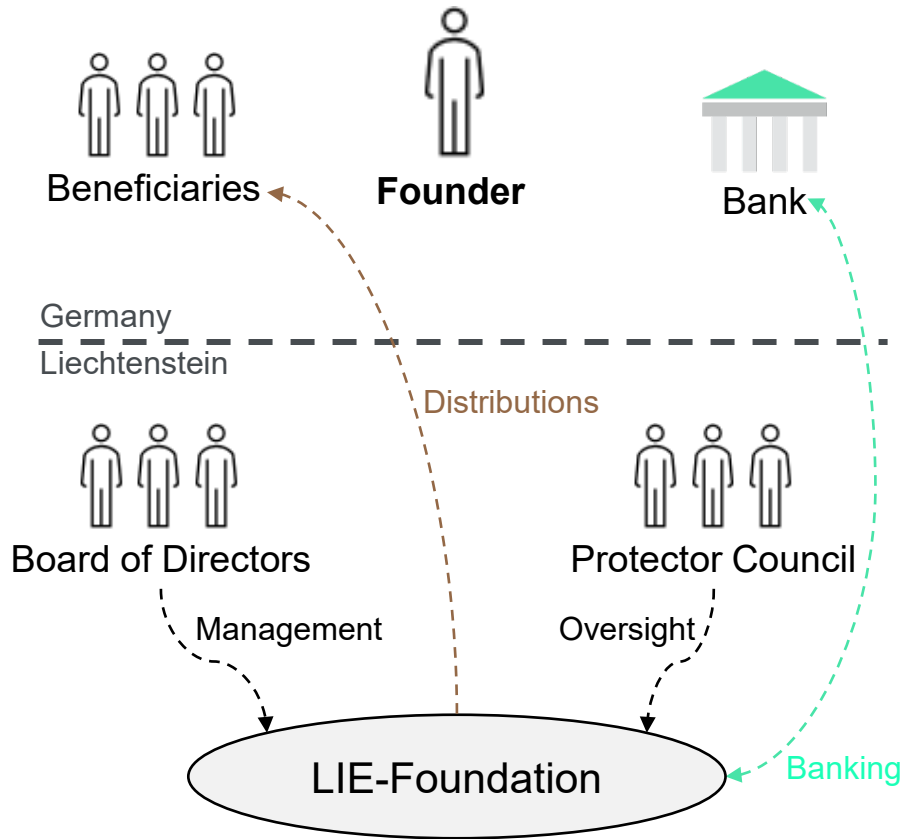




Practical questions from a bank's perspective

Answered from a Liechtenstein perspective.

LIE-FOUNDATION STRUCTURE



KEY QUESTIONS

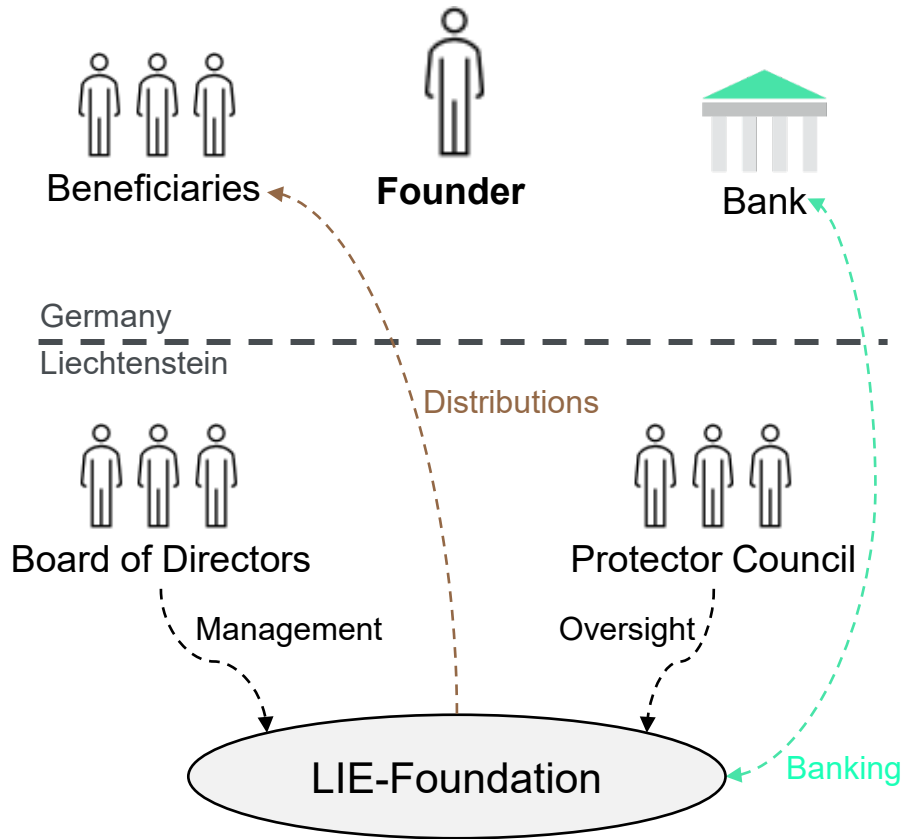
- Is it ensured that the place of effective management of the foundation and/or the foundation's subsidiary company/establishment that is to become our client is located abroad (Liechtenstein)?
 - Qualified foundation board member (Art. 180a PGR)
 - Strategic decisions taken in FL / Place of effective management
- Is it ensured that material decisions (including investment decisions) of the client are made in Liechtenstein and that this is appropriately documented/minuted?
 - Management authority of the foundation board
 - Investment guidelines as framework, not instruction
- Is it ensured that there are no domestic residents ("Inländer") who have sole power of representation for the foundation?
 - Joint signature
 - Advisory bodies without signing authority

Source: J.P. Morgan Private Bank.

Practical questions from a bank's perspective

Answered from a Liechtenstein perspective.

LIE-FOUNDATION STRUCTURE



KEY QUESTIONS

- Is it ensured that the foundation assets have been transferred to the foundation irrevocably?
 - Complete separation of assets
 - “Vermögensopfer” doctrine / asset sacrifice test
 - Retained rights = weaker protection
- Is it ensured that the founder (or other persons) cannot revoke the foundation and has no unilateral rights of reclaiming or issuing instructions in respect of the foundation assets?
 - Irrevocability as default
 - Revocation / amendment
 - No mandate agreements
 - Frustration of purpose
- Is it ensured that domestic residents (“Inländer”) only conduct general market discussions with the private bank, and that these persons have no signing/disposal authority over the assets held in the account—at most an information-only power of attorney?
 - No signing / disposal authority for German residents
 - Information-only power
 - General market discussions permitted

Source: J.P. Morgan Private Bank.

Good to Know

- Recognition within EWR/EU
- Asset Protection Enforcement privilege
- Forced heirship protection
- Spendthrift protection for beneficiaries
- Founder's rights – tension between control and protection



A large, bold, green letter 'A' serves as a background for the title. The letter is centered and has a slight shadow effect.

Appendix

Your Contacts at J.P. Morgan Private Bank

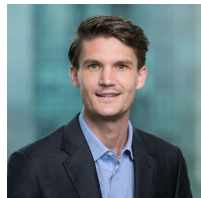
WEALTH ADVISOR



Yannick Stehr

Yannick Stehr is part of a global Wealth Advisory team of 80 members and leads the Germany desk. Before joining J.P. Morgan Private Bank in 2015, he spent 9 years in Munich, most recently as Salary Partner at a tax law boutique specializing in private clients, where he served as a certified tax attorney and tax advisor. Prior to that, he worked at a Big 4 firm in the international tax team as well as at an international law firm, also in tax law. His core areas of expertise include international tax planning for private individuals, succession planning, family governance, and nonprofit law. In this capacity, he has extensive experience advising domestic and international clients of the bank. Yannick Stehr studied law in Passau and Munich and is a member of the International Fiscal Association as well as the Franco-German Association of Jurists. He is married and has two children.

CLIENT ADVISOR



Richard Becker

Richard Becker is an Executive Director at J.P. Morgan Private Bank in Frankfurt, focusing on advising ultra-high-net-worth individuals, families, successful entrepreneurs, and athletes in Germany. Previously, he held the same role at Deutsche Bank Wealth Management. From 2010 to 2015, he was a professional tennis player. He studied International Management at ISM Frankfurt and completed an Executive Education Program at WHU–Otto Beisheim School of Management. Originally from the Ostwestfalen region, he now resides in Frankfurt.

WEALTH ADVISOR



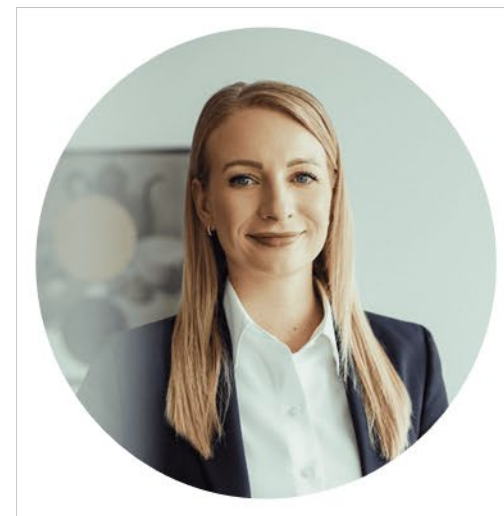
Moritz Bellgardt

Moritz Bellgardt is a Vice President and Wealth Advisor in the Frankfurt office of J.P. Morgan Private Bank. Before joining J.P. Morgan Private Bank, Moritz worked at one of Germany's leading tax advisory firms in Frankfurt, advising private clients, family offices, and family-owned enterprises. His focus areas include succession planning, wealth structuring, international tax planning for private individuals, and nonprofit law. He has published articles on these topics in leading professional journals. Moritz studied Economics in Freiburg and Business Administration in Mannheim.

«Every matter is a commitment for us. We take responsibility, provide comprehensive advice and guidance, and think ahead — holistically, strategically, and proactively.»

Martina Knünz is a senior associate with Gasser Partner since 2024 and a notary substitute since 2025. She advises clients on issues of civil and civil procedure law, corporate law, foundation and trust law as well as private client matters, estate planning and real estate law.

Before joining Gasser Partner, she was a lawyer in a prominent Liechtenstein law firm. Martina Knünz graduated and obtained her PhD at the University of Innsbruck.



RA Dr. Martina Knünz
Senior Associate

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