

Country	Issue	Fact	Assessment	
			OECD/ Global Forum	TJN's FSI
USA	Company Ownership Registration	"Ownership and identity information for single member LLCs is not always available" (GF 2011: 47)	Phase 1: In place, but certain aspects need improvement. Phase 2: Largely Compliant	Companies available without recorded ownership Information (zero credit for company ownership registration)
	AEOI pursuant to CRS	"The Model 1A IGAs entered into by the United States acknowledge the need for the United States to achieve equivalent levels of reciprocal automatic information exchange with partner jurisdictions. They also include a political commitment to pursue the adoption of regulations and to advocate and support relevant legislation to achieve such equivalent levels of reciprocal automatic exchange" (CRS Status of Commitments).	USA not included among "jurisdictions not committed to the CRS", but was neutrally isolated in a footnote.	USA has not committed to the CRS
Panama	Company Ownership Registration	"there is no need to update the information in the Public Registry following the incorporation and there are no specific sanctions on the company if the stock register is not kept up to date" (GF 2014: 19). In addition, bearer shares will be immobilized by a private custodian (KPMG)	In place, but certain aspects need improvement	Companies available without recorded ownership Information (zero credit for company ownership registration)
	AEOI pursuant to CRS	Panama will undertake AEOI bilaterally, just like the U.S.	Pre-Panama Papers: "Committed to implement in 2018" / In the eve of Panama Papers: "Jurisdiction not committed to the CRS"	Jurisdiction not committed to the CRS

Switzerland	Company Ownership Registration	Regarding an SCA (société en commandite par actions): “There is no requirement to provide identity or ownership information on 'passive' members ('commanditaires'), being those with limited liability" (GF 2011: 22). In 2015 the Global Forum did not refer to any changes regarding company registration (GF 2015).	“Not in Place”. However, “Jurisdiction is ready to move to Phase 2”	Companies available without recorded ownership Information (zero credit for company ownership registration)
	AEOI pursuant to CRS	Switzerland signed the MCAA and committed to exchange information in 2018	Jurisdiction committed to 2018	Jurisdiction committed to 2018 + Blogs regarding Swiss obstacles (AEOI only with countries with close political ties, that offer regularization and that are promising for Swiss financial industry)
BVI	Company Ownership Registration	"Upon the incorporation of a company in the Virgin Islands, it has to be registered in the Register of Companies (s. 7 BCA). Various information has to be provided upon registration (s. 6 and 9 BCA), but this does not include information identifying the owners of the company [...] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not impose any obligations on providing ownership information to the authorities upon registration or keeping such information" (GF 2011: 20; TJN Note). In 2015 the Global Forum confirmed that there is no need to file ownership information to authorities (GF 2015: 22).	Phase 1: In place. Phase 2: Compliant	Companies available without recorded ownership Information (zero credit for company ownership registration)
	AEOI pursuant to CRS	BVI signed the MCAA and committed to exchange information in 2018	Signed the MCAA and Committed to 2017	Signed the MCAA and Committed to 2017

