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SAMPLE ADVISORY REPORT · ILLUSTRATIVE CASE · LATIN AMERICA → UNITED STATES

US Subsidiary, USD Business Account, Trade Finance and Personal Banking in Miami — an Argentine Exporter's Entry into the United States

How a FINTECH SCB written opinion reads for a market-entry case: one recommendation, verified costs, mandate, documents and timing

Case: SYNTHETIC CASE 2 — Valeria Costa / Agrotec Pampa S.A. (fictional names, fictional companies, synthetic figures)
Client: Ms Valeria Costa — Agrotec Pampa S.A. (Buenos Aires, Argentina)
Date: 5 November 2026 **Version:** 1.1 (sample) **Language:** English
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Reading guide

This second sample shows how FINTECH SCB answers a market-entry question from Latin America: an Argentine exporter who wants to sell in the United States through her own company, invoice in US dollars, finance her export cycle and bring her personal banking to Miami. One recommended solution, six sections, verified costs, and the mandate, documents and timing to implement it.

The case is **entirely invented**. Ms Costa, Agrotec Pampa S.A. and every client figure are synthetic. External facts — Delaware fees, US reporting rules, the Argentina–United States tax information agreement, provider conditions — are real and carry their source and verification date. Nothing here is advice to any reader.

CLIENT FACT (SYNTHETIC) VERIFIED EXTERNAL FACT ASSUMPTION MODEL OUTPUT PROFESSIONAL JUDGMENT

Labels: **Client fact (synthetic)** — supplied by the client; **Verified external fact** — read on an official or authoritative source on a stated date; **Assumption** — to be confirmed before implementation; **Model output** — computed from the facts and assumptions; **Professional judgment** — our recommendation after the Challenger and Reviewer passes.

> **STATUS**
>
> **PUBLISHED AS A SAMPLE.** Released only after approval of the exact current version by Roberto Balbino. This sample is published to show the standard; it is not approved for any client.

1. Client objective and documents available or missing

1.1 Who the client is

CLIENT FACT (SYNTHETIC)

Ms Valeria Costa, aged 48, Argentine citizen and tax resident in Buenos Aires, sole shareholder and chief executive of **Agrotec Pampa S.A.**, a manufacturer of precision-agriculture sensors and controllers for seeders and sprayers. Revenue 2025 USD 6.2 million, EBITDA USD 1.1 million, 58% exports (Brazil, Uruguay, Chile and, since 2024, the United States through two distributors in Iowa and Texas). US orders reached USD 0.85 million in 2025; the 2026 pipeline from US dealers is USD 1.6 million, conditional on US-based stock, USD invoicing and a local service presence. The company has no debt; it finances exports with its Argentine bank's pre-financing lines. Ms Costa holds declared personal liquid assets of USD 1.4 million in Argentina and other assets of USD 0.9 million (home and a rural plot).

USD 6.2m	USD 1.1m	58%	USD 1.6m	USD 1.4m
REVENUE 2025	EBITDA 2025	EXPORT SHARE	US PIPELINE 2026	PERSONAL LIQUID ASSETS

1.2 The objectives, in the client's words

CLIENT FACT (SYNTHETIC)

1. **"I want my own company in the United States."** To stock product locally, invoice US customers in dollars, hire a service technician in Florida and stop depending on distributors' terms.
2. **"I want a real US bank account for the company."** To receive USD, pay suppliers and payroll, and use cards — at a bank, not a payment app.
3. **"I want to finance the export cycle without using all my cash."** Letters of credit from US customers and pre-financing of production.
4. **"I want my personal savings in Miami, properly."** A declared personal banking relationship in the United States for part of her liquid assets, with everything reported in Argentina.
5. **"Everything must be declared on both sides."** She wants to understand exactly what Argentina and the United States exchange about her.

1.3 Documents available and documents missing

CLIENT FACT (SYNTHETIC) PROFESSIONAL JUDGMENT

Document	Status	Why it matters	Consequence if missing
Agrotec Pampa S.A. financial statements 2023–2025 (audited)	Received	Basis for the bank, the trade-finance lines and the US business plan	—

Document	Status	Why it matters	Consequence if missing
Export invoices, incoterms and payment terms with the two US distributors	Received	Defines the trade-finance need and the US pricing	—
US dealer pipeline letters (2026)	Received (2 of 5)	Supports the US revenue plan	Plan labelled ASSUMPTION beyond the two letters
Corporate documents of the S.A. (statutes, board, shareholder register, CUIT)	Received	Required by the Delaware agent, the bank and the US tax filings	—
Ms Costa's identity, address, tax residence certificate, origin-of-wealth summary	Received (identity); **missing** tax residence certificate	Required by every bank and broker	Personal account application cannot be filed until received
Argentine tax position of the company and of Ms Costa (last returns)	**Missing**	Needed for the Argentine tax memo on the US subsidiary and on personal foreign assets	Argentine tax section marked PRELIMINARY
Transfer-pricing basis for sales to the US subsidiary	**Missing**	Required in both countries once the subsidiary buys from the parent	To be built in the mandate
Product certifications for the US market (electrical safety, radio)	Received	Avoids a customs or liability surprise	—

Table 1 — Document inventory.

1.4 What this report is and what it is not

PROFESSIONAL JUDGMENT

A written professional opinion with one recommended solution and an implementation plan. Not a tax opinion: the Argentine and US tax points below are reference information that the appointed Argentine and US tax counsel confirm in writing under their own mandates, coordinated by FINTECH SCB. Not a guarantee of any bank's, broker's or lender's acceptance.

MATERIAL CONDITIONS

All personal and corporate assets must be declared in Argentina before any transfer abroad; a foreign account does not regularise undeclared assets. Ms Costa has declared that all assets are declared; the solution relies on that statement.

Argentine foreign-exchange rules govern the outflow of capital and the inflow of export proceeds and change frequently; every transfer in this plan is executed only after Argentine counsel confirms the applicable rule on the day.

2. Our solution in brief

PROFESSIONAL JUDGMENT MODEL OUTPUT

A Delaware corporation owned 100% by Agrotec Pampa S.A., qualified in Florida with a Miami office; a US business bank account opened after FINTECH SCB's pre-screening; export letters of credit confirmed by a US bank plus Argentine pre-financing for the production cycle; and, for Ms Costa personally, a US deposit account and a brokerage account for the investment portion, all reported in Argentina under the automatic exchange in force since 2023.

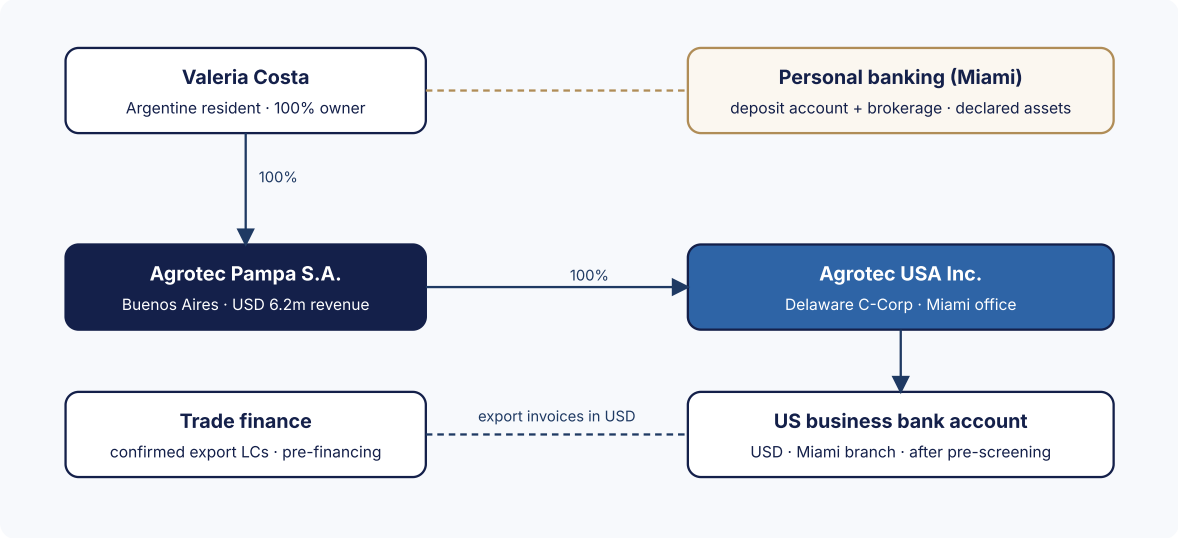


Figure 1 — Target structure (illustrative).

Why this is the recommended solution

- **A corporation, not an LLC, for a foreign-owned operating business.** A single-member LLC owned by the Argentine company would be disregarded for US tax and would pull the Argentine parent into US tax filings as if it operated directly in the United States; a Delaware C-Corporation pays its own US tax (21% federal plus Florida 5.5%), files its own returns and keeps the parent outside the US tax net. The same clarity reassures the bank and the US dealers.
- **Delaware for formation, Florida for operations.** Delaware's fees are modest and verified (annual report USD 50, minimum franchise tax USD 175, due 1 March); the company qualifies as a foreign corporation in Florida, where the office, stock and technician are. One registered agent in Delaware, one in Florida.
- **Reinvest first, distribute later.** There is no income tax treaty between the United States and Argentina: dividends from the US subsidiary to the parent suffer 30% US withholding. The plan keeps profits in the United States during the growth phase (model: USD 0.40 million cumulative net profit over three years) and designs distributions with counsel later.
- **Bank account at a bank, not a platform.** Payment platforms open in minutes but are not banks, hold no deposit guarantee and often exclude foreign-owned companies. The subsidiary applies to a US national bank with a Miami branch; the bank is confirmed at engagement after FINTECH SCB's pre-screening, because no published tariff verified by us today covers this exact profile.

- **Trade finance that matches the cycle.** Letters of credit from US customers confirmed by a US bank remove buyer risk on about half of US sales; Argentine export pre-financing funds production. Model cost of the two instruments in year two: about USD 48,000, against USD 2.6 million of US sales.
- **Personal banking that is simple and declared.** USD 1.4 million is below the thresholds of US private banks; the better fit is a deposit account at a Miami branch for USD 0.3 million and a US brokerage account for USD 0.9 million (the chosen broker accepts residents of most countries with an online application — verified), keeping USD 0.2 million in Argentina as a reserve. Interest and dividends are reported automatically to Argentina under the FATCA agreement in force since 1 January 2023; balances are not.

USD 299	USD 354/yr	25.3%	30%	USD 399k
DELAWARE + FLORIDA SET-UP FEES (VERIFIED)	RECURRING DELAWARE COSTS	COMBINED US TAX RATE ON PROFIT	US WITHHOLDING ON DIVIDENDS TO ARGENTINA (NO TREATY)	CUMULATIVE NET PROFIT 2026–2028

2.1 Alternatives considered

PROFESSIONAL JUDGMENT

Alternative	What it would achieve	Why it was not recommended
Keep selling through distributors	No set-up cost	Does not meet objectives 1–3: no stock, no USD invoicing, dealers' terms
Florida branch of Agrotec Pampa S.A.	One legal entity	Exposes the Argentine company to US tax and liability directly; a foreign entity registered in the US must file beneficial-ownership information (FinCEN rule in force 14 August 2026), while a US-formed corporation is exempt
Delaware LLC owned by Ms Costa personally	Simplicity	Mixes personal and corporate; US income taxed to her personally with 30% withholding and US filings; weaker for the bank and for a future investor
Holding company in a third country (e.g. Spain, Netherlands) to use a treaty	Lower withholding on paper	Anti-conduit and substance rules; cost; not justified at this size — revisit above USD 1 million of annual US profit
Payment platform instead of a bank	Fast opening	Not a bank; no deposit guarantee; foreign-owned companies often excluded

Table 2 — Alternatives (Challenger pass).

3. Operational explanation, responsibilities, costs, conditions and risks

3.1 Step 1 — Agrotec USA Inc.: formation, qualification, tax set-up

VERIFIED EXTERNAL FACT | ASSUMPTION | PROFESSIONAL JUDGMENT

1. **Incorporation in Delaware** through a registered formation agent engaged by FINTECH SCB on the client's mandate (a Delaware provider in the FINTECH SCB register advertises a public formation package at USD 229 including the first year of registered-agent service — public price, to be confirmed at engagement). Certificate of incorporation, bylaws, first board resolutions, stock ledger (100% to Agrotec Pampa S.A.).
2. **EIN** from the IRS (Form SS-4) — FINTECH SCB prepares; the responsible party is Ms Costa as president.
3. **Florida foreign qualification** (application by foreign corporation; state fee reference USD 70) and a Florida registered agent; Miami office lease (serviced office acceptable at first); Florida sales-tax registration if required by the product and channel.
4. **Annual compliance:** Delaware annual report and franchise tax by 1 March (USD 50 report fee; minimum tax USD 175 under the authorised-shares method — choose a small authorised share count to stay at the minimum; late penalty USD 200); Florida annual report; US federal and Florida corporate returns; Form 5472 information return on transactions with the Argentine parent.
5. **Beneficial-ownership reporting:** under the FinCEN final rule in force from 14 August 2026, companies formed in the United States are exempt from BOI reporting; only foreign entities registered to do business in the US must report. Agrotec USA Inc. is therefore exempt; a Florida branch of the Argentine S.A. would not have been.
6. **Transfer pricing:** the subsidiary buys product from the parent; an intercompany supply agreement and a transfer-pricing file are prepared in the mandate (US and Argentine rules both apply).

> **VERIFIED EXTERNAL FACTS (READ ON 1 NOVEMBER 2026 UNLESS STATED)**
>
> Delaware Division of Corporations: domestic corporation annual report filing fee USD 50; minimum franchise tax USD 175 (authorised-shares method) or USD 400 (assumed par value method); due 1 March; LLC/LP annual tax USD 400 due 1 June; late penalty USD 200. Refresh by 1 May 2027.
>
> FinCEN BOI: final rule in force 14 August 2026 — US companies exempt; reporting only by foreign entities registered in the US (FINTECH SCB register, read 28 October 2026).
>
> Delaware formation provider public package USD 229 (FINTECH SCB register, inherited record 23 September 2026 — to confirm at engagement).

Cost item	Year 1 (USD)	Recurring (USD / year)	Status
Delaware formation package incl. first-year agent	229	—	Public price, to confirm
Florida foreign qualification	70	Florida annual report: reference ~150	Reference

Cost item	Year 1 (USD)	Recurring (USD / year)	Status
Delaware annual report + minimum franchise tax	—	50 + 175	Verified
Delaware registered agent (from year 2)	—	~129	Register (provider price), to confirm
US tax returns, Form 5472, bookkeeping	Quote	Quote	To be quoted
Miami serviced office	Quote	Quote	To be quoted
FINTECH SCB — structuring and implementation mandate	Fixed fee (illustrative USD 18,000)	Annual review (illustrative USD 4,000)	Illustrative — to be confirmed by FINTECH

Table 3 — Formation and compliance costs. FINTECH SCB's fee includes its financial, tax, M&A and legal experts; only external costs are charged in addition, always agreed in advance.

3.2 Step 2 — The US business bank account

VERIFIED EXTERNAL FACT PROFESSIONAL JUDGMENT

Objective 2 is a current account in USD at a US bank for a company owned by a foreign company and run by a non-resident president. This is a profile that banks accept case by case. FINTECH SCB's register has no verified published tariff for a US national bank on this exact profile at the date of this report; it does record what platforms say about themselves (verified pages, 28 October 2026): a well-known US business platform states it is not a bank, that deposits are held by partner banks and that eligibility depends on entity type and residency. We therefore recommend a **US national bank with a Miami branch**, selected through pre-screening, and we do not name it until the bank has confirmed acceptance of the profile.

1. Pre-screening (2 weeks): anonymised profile to two candidate banks' international business desks — expected flows, origin of funds (the parent's export earnings, documented by audited accounts), stock in Miami, number of employees.
2. Documents: certificate of incorporation, EIN letter, bylaws, Florida qualification, board resolution, ownership chart up to Ms Costa, her passport and proof of address, the parent's statutes and accounts, the business plan (Annex A).
3. Application and meeting in Miami (combined with the office set-up trip); account opening; online banking, cards, ACH and wires; a USD sub-account for the letters of credit.
4. Fallback: the second candidate with the same pack; the subsidiary does not invoice US customers before the account is open.

> **MATERIAL CONDITION**
>
> No bank guarantees acceptance. The subsidiary's first invoices and the trade-finance lines are scheduled after the account is confirmed, never before.

3.3 Step 3 — Trade finance for the export cycle

ASSUMPTION MODEL OUTPUT PROFESSIONAL JUDGMENT

The US cycle is long: production in Argentina (60 days), shipping (30 days), stock in Miami (model: 75 days of inventory), dealer payment terms (60 days). Two instruments finance it:

- **Export letters of credit** opened by the larger US dealers in favour of Agrotec USA Inc. (or the parent for direct shipments), confirmed by a US bank, for about 50% of US sales. Cost assumption: 1.25% issuance plus 0.75% confirmation.
- **Export pre-financing** from the company's Argentine bank for 40% of the US order book, 90 days, rate assumption 8.5% in USD; repaid from the LC proceeds. Subject to BCRA foreign-exchange rules at the time of each draw and repayment — confirmed by Argentine counsel.

Item (year 2, USD m)	Volume	Cost	Note
Letters of credit confirmed (50% of US sales)	1.30	0.026	1.25% + 0.75% (assumption)
Export pre-financing (40% of order book, 90 days)	1.04	0.022	8.5% p.a. (assumption)
Net working capital tied up in the US	0.78	—	Receivables 60 days + inventory 75 days (model)
Total financing cost		**0.048**	= 1.8% of US sales

Table 4 — Trade-finance cost model (model output on assumptions).

3.4 Step 4 — Ms Costa's personal banking in Miami

VERIFIED EXTERNAL FACT ASSUMPTION PROFESSIONAL JUDGMENT

Objective 4 is served by two accounts rather than one private bank: a **deposit account** at a Miami branch (USD 0.3 million; for payments, cards and a cash reserve) and a **brokerage account** for the investment portion (USD 0.9 million). The chosen broker states that it opens accounts online for citizens or residents of most countries, excluding sanctioned and higher-risk countries, and that it is a broker, not a bank (verified page, 28 October 2026). The remaining USD 0.2 million stays in Argentina as a family reserve. US private banks in the FINTECH SCB register serve larger estates and their thresholds are to be confirmed; they are not the right fit at USD 1.4 million.

> **VERIFIED EXTERNAL FACT — WHAT ARGENTINA LEARNS AUTOMATICALLY**
>
> The FATCA agreement between Argentina and the United States was signed in December 2022 and has been in force since 1 January 2023, with the first exchange in September 2024. For an Argentine resident's US accounts the United States reports name, address, Argentine tax number, account number, the US institution, interest on deposit accounts (above USD 10 per year), US-source dividends and other US-source income; it does not automatically report account balances. Argentina reports balances on US persons' accounts. Source: El Cronista (English edition), 7 October 2026, read 1 November 2026; refresh by 1 May 2027. Ms Costa declares the accounts and their income in Argentina in any case.

Allocation (USD m)	Amount	Vehicle	Purpose
Reserve in Argentina	0.20	Existing Argentine accounts	Family expenses, 12 months
US deposit account	0.30	Miami branch (bank confirmed at engagement)	Payments, cards, liquidity

Allocation (USD m)	Amount	Vehicle	Purpose
US brokerage account	0.90	US broker, online application	Diversified portfolio; no investment advice in this report
Total	**1.40**		

Table 5 — Personal allocation (illustrative; investment choices are a separate mandate).

3.5 Tax map — what is paid where

VERIFIED EXTERNAL FACT ASSUMPTION PROFESSIONAL JUDGMENT

Flow	United States	Argentina	Status
Profit of Agrotec USA Inc.	21% federal + 5.5% Florida ≈ 25.3% combined	Not taxed until distributed; CFC-type rules to be checked by Argentine counsel	Reference — to confirm
Dividend from Agrotec USA to the parent	30% withholding (no treaty)	Taxed as foreign-source income with credit for US tax, per Argentine rules	Reference — to confirm
Sales from the parent to the subsidiary	Deductible at arm's length; Form 5472	Export income; transfer pricing file	To be built in the mandate
Ms Costa's US interest and dividends	US withholding on dividends (30% without treaty); interest on bank deposits generally exempt for non-residents	Reported automatically; taxed in Argentina	Reference — to confirm
Ms Costa's personal wealth tax (Argentina)	—	Foreign assets included per current law	Argentine counsel

Table 6 — Tax map (reference information; counsel confirms).

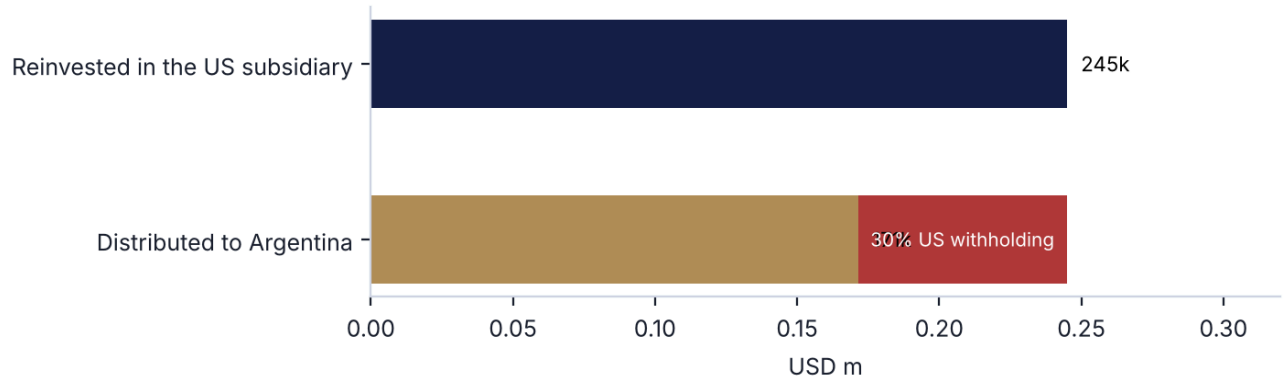


Figure 2 — Year-3 net profit: reinvested versus distributed to Argentina with 30% withholding (model output).

3.6 Risks and mitigations

PROFESSIONAL JUDGMENT

Risk	Likelihood	Impact	Mitigation
Bank declines the subsidiary	Medium	Delay 1–2 months	Pre-screening; complete pack; second candidate
Argentine FX rules restrict a transfer on the day	Medium	Timing	Counsel confirms each transfer; plan B sequencing
US dealers do not accept LCs	Medium	More pre-financing	Mix: LCs for large orders, open account with credit insurance for small ones
Transfer-pricing challenge	Low–medium	Adjustments	File prepared from day one; arm's-length margin
Product liability in the US	Low	High	Product liability insurance before first US sale
Key-person: Ms Costa runs both companies	Structural	Medium	Local general manager in Miami from year 2

Table 7 — Risk register.

4. The mandate the client must give FINTECH SCB

PROFESSIONAL JUDGMENT

Module	Scope	Conditions precedent	Deliverables	Fee basis
M1 — Structuring	Final structure memo; coordination of Argentine and US tax memos; provider, bank and broker selection	Signed mandate; documents; declaration on declared assets	Memo v2 with memos attached	Fixed fee
M2 — US company and bank	Incorporation, EIN, Florida qualification, office, bank account, compliance calendar	Tax memos received	Operating subsidiary with open account	Fixed fee
M3 — Trade finance	LC templates with dealers, confirming bank, Argentine pre-financing line, FX sequencing	M2 account open	Signed facilities; first LC	Fixed fee
M4 — Personal banking	Deposit and brokerage applications, reporting pack for Argentina	Tax residence certificate received	Accounts opened; reporting pack	Fixed fee

Table 8 — Mandate modules. FINTECH SCB coordinates the fiscal and legal aspects relevant to the assignment, where requested, through qualified trusted professionals under the respective agreed mandates.

5. Documents FINTECH SCB prepares or coordinates

PROFESSIONAL JUDGMENT

1. Engagement letter and confidentiality agreement.
2. Information request list (Annex B).
3. Structure memorandum v2 with the Argentine and US tax memos (appointed counsel).
4. Delaware incorporation pack; EIN application; Florida qualification; registered-agent agreements.
5. Business plan for the bank (Annex A) and bank application pack with ownership chart and origin-of-funds narrative.
6. Intercompany supply agreement and transfer-pricing file (with counsel).
7. LC templates and dealer letters; pre-financing application to the Argentine bank; FX sequencing memo.
8. Personal account applications (deposit and brokerage) and the annual reporting pack for Argentina.
9. Compliance calendar (Delaware 1 March, Florida, US returns, Form 5472, Argentine filings).

6. Timing

ASSUMPTION

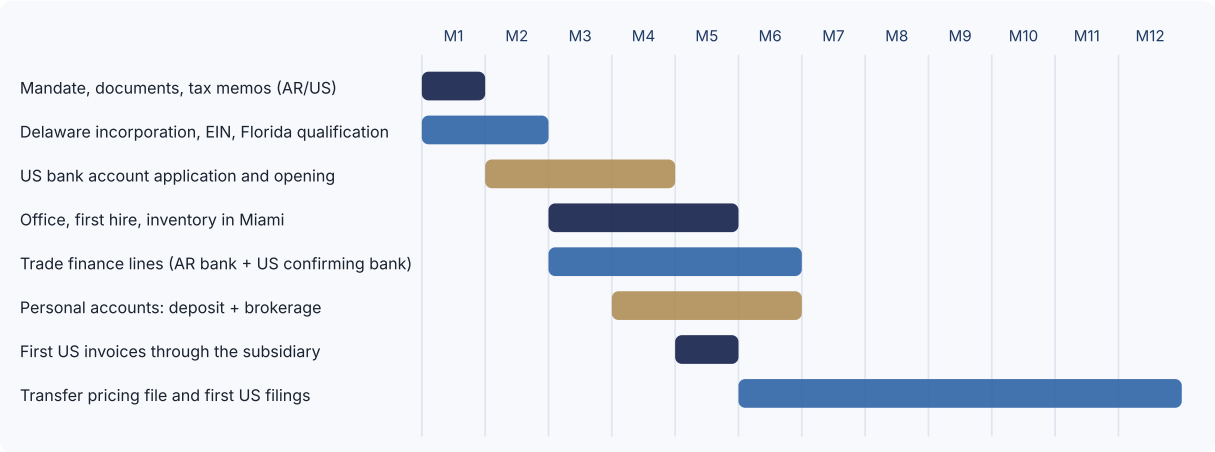


Figure 3 — Indicative timeline (months from mandate). To be confirmed by Roberto Balbino.

Six months from mandate to the first US invoice through the subsidiary is realistic if the bank accepts at the first attempt; the personal accounts run in parallel once the tax residence certificate is received. Timing is confirmed by Roberto Balbino at engagement; where no date is confirmed, the report says “to be confirmed”.

Annex A — US subsidiary business plan (model)

MODEL OUTPUT ASSUMPTION

Year	US revenue	Gross profit (34%)	Operating costs	EBIT	US taxes	Net profit	Cumulative net	Working capital
2026	1.60	0.54	0.52	0.03	0.01	0.02	0.02	0.48
2027	2.60	0.88	0.71	0.18	0.05	0.13	0.15	0.78
2028	3.60	1.22	0.90	0.33	0.08	0.24	0.40	1.08

Table A1 — Three-year plan (USD m, model output). Revenue USD 1.6m / 2.6m / 3.6m; gross margin 34%; fixed costs USD 0.42m / 0.55m / 0.68m plus 6% variable; taxes 21% federal + 5.5% Florida.

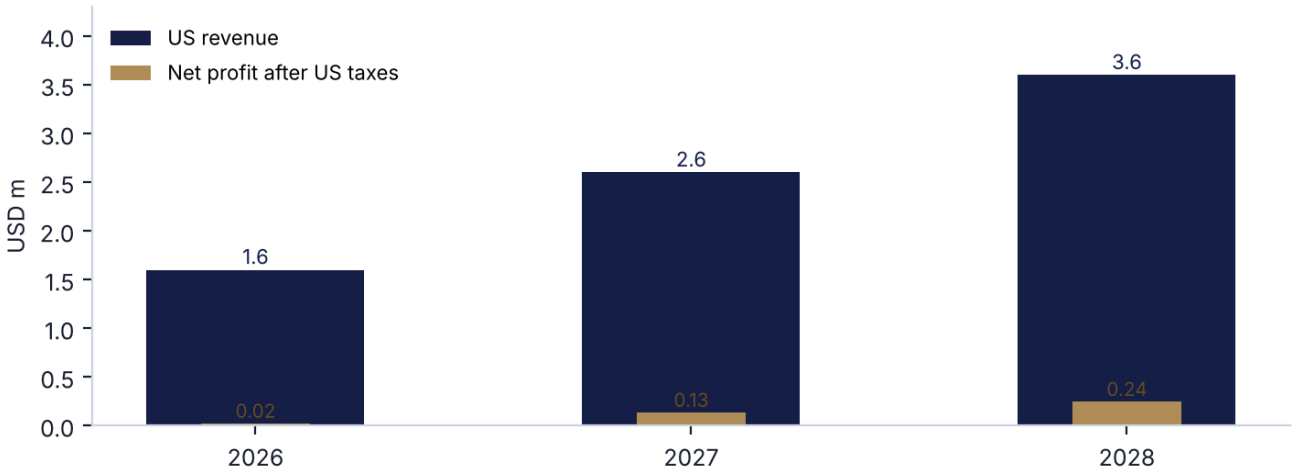


Figure A1 — US revenue and net profit (model output).

Sources (USD m)		Uses (USD m)	
Parent equity into Agrotec USA Inc.	0.60	Initial inventory in Miami	0.22
		Receivables buffer	0.18
		Office, technician, launch costs	0.12
		Formation, bank, insurance	0.03
		Cash buffer	0.05
Total	**0.60**	**Total**	**0.60**

Table A2 — Set-up capital (assumption: USD 0.6m from the parent's cash, subject to Argentine FX rules).

Annex B — Information request list

PROFESSIONAL JUDGMENT

1. Ms Costa: Argentine tax residence certificate; last two personal tax returns; summary of foreign assets, if any.

2. Agrotec Pampa S.A.: last two corporate tax returns; export registry details; bank pre-financing terms; product liability insurance.
3. US dealers: remaining pipeline letters; willingness to open letters of credit; payment terms.
4. Confirmation in writing that all assets are declared in Argentina.

Annex C — Sources and verification register

VERIFIED EXTERNAL FACT

#	Claim	Source	Read on	Refresh by	Type
1	Delaware annual report fee USD 50; minimum franchise tax USD 175 / 400; due 1 March; LLC tax USD 400; penalty USD 200	corp.delaware.gov — Annual Report and Tax Instructions	01.11.2026	01.05.2027	Verified
2	FinCEN BOI final rule in force 14.08.2026: US companies exempt; foreign registered entities report	fincen.gov/BOI (FINTECH SCB register I074)	28.10.2026	26.04.2027	Verified
3	Argentina–US FATCA agreement signed Dec. 2022, in force 1.1.2023, first exchange Sept. 2024; data exchanged; balances not reported by the US	El Cronista (EN), 7.10.2026	01.11.2026	01.05.2027	Verified (press, official statements quoted)
4	US broker: online application for citizens/residents of most countries; broker, not bank	broker's official site (register B175)	28.10.2026	26.01.2027	Verified (page read)
5	US business platform: not a bank; partner banks; eligibility by entity/residency	Provider help centre (register P011)	23.09.2026 (inherited)	22.12.2026	Inherited — to re-verify
6	Delaware formation package USD 229	Provider page (register P001)	23.09.2026 (inherited)	22.12.2026	Inherited — to confirm
7	US federal corporate tax 21%; Florida 5.5%; 30% withholding to non-treaty countries; no US–Argentina income tax treaty	US tax law — reference knowledge	—	At engagement	Reference — US counsel confirms
8	Argentine tax and FX rules on foreign subsidiaries, foreign assets and transfers	To be confirmed by Argentine counsel; BCRA API in register	—	At engagement	Open

Table C1 — Source register.

Annex D — How the FINTECH SCB AI Advisor complements this report

PROFESSIONAL JUDGMENT

Client: "Why not an LLC? Everyone in Miami tells me LLC."

> AI Advisor: For a US resident an LLC is often simplest. For a company owned by your Argentine S.A., a single-member LLC is ignored for US tax and your Argentine company would be treated as doing business in the US itself, with its own US filings and 30% withholding exposure; a C-Corporation keeps the US business inside a US taxpayer and stops there. The report also notes that the choice matters to the bank and to dealers. If your situation changes — for example you move to the United States — the analysis changes and a formal question is the right next step.

Client: "What exactly will Argentina see about my Miami accounts?"

> AI Advisor: Under the agreement in force since 2023 the United States sends Argentina your name, tax number, account number, the bank's name, interest above USD 10 a year on deposit accounts, US-source dividends and similar income — not the balance. Argentina sends balances the other way. You declare the accounts in Argentina in any case; the report's reporting pack covers it. Would you like the list of what to keep for the annual filing?

Client: "Can we finance the first container without the LC?"

> AI Advisor: Yes, with the pre-financing line and the parent's cash, but the report ties the first subsidiary invoice to the bank account being open. For a first shipment to a dealer with whom you already work, open-account terms with credit insurance are a reasonable alternative; I can outline the trade-offs, and the formal decision belongs in the mandate's trade-finance module.

Annex E — Implementation checklist from A to Z

PROFESSIONAL JUDGMENT

#	Step	Owner	Evidence	Module
A	Mandate and confidentiality agreement signed	Client / FINTECH SCB	Signed PDFs	M1
B	Documents collected; declaration on declared assets	Client	Checklist	M1
C	Argentine and US tax memos received	Counsel	Memos filed	M1
D	Delaware incorporation; EIN; Florida qualification	Agent / FINTECH SCB	Certificates	M2
E	Bank pre-screening; application; account open	FINTECH SCB / bank	Account letter	M2
F	Office, technician, insurance, inventory shipped	Client	Lease; policy; bill of lading	M2
G	Intercompany agreement; transfer-pricing file	Counsel / FINTECH SCB	Signed agreement	M2
H	LC templates agreed with dealers; confirming bank; pre-financing line	FINTECH SCB / banks	Facilities	M3
I	First subsidiary invoice; first LC	Client	Invoice; LC	M3
J	Personal deposit and brokerage accounts opened	Client / FINTECH SCB	Account letters	M4

#	Step	Owner	Evidence	Module
K	Reporting pack for Argentina; compliance calendar live	FINTECH SCB	Pack; calendar	M4
Z	First annual review	FINTECH SCB	Review report	Annual

Table E1 — Checklist.

Annex F — Classification, approval and disclaimer

Classification: PUBLIC — SAMPLE DOCUMENT FOR PUBLICATION. No real client data. **Version:** 1.1, 5 November 2026, English; Italian and Spanish versions published alongside. **Approval:** status **PUBLISHED AS A SAMPLE;** substantive revisions invalidate previous approval. **Disclaimer:** FINTECH SCB is a financial advisory and intelligence firm; it is not a bank, not a licensed investment firm, not a law firm and not a tax adviser. This sample does not constitute investment, legal or tax advice; tax, legal and regulatory statements are reference information at the dates indicated and are confirmed in a real engagement by appointed qualified professionals. Third parties decide independently; no acceptance, price or outcome is guaranteed.

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