



# High-Stakes Cross-Border Implementation & Structural Integrity

Where Senior Judgment Meets Technical Precision

## THE FIDUCIAE STANDARD

# Architecting Structural Integrity.

**FIDUCIAE** is a senior-led boutique practice engineered for the precision implementation, governance, and transition of cross-border legal structures.

We intervene at critical stages—from SPV incorporation and governance to complex restructurings including redomiciliations, divisions, spin-offs, and mergers, through to final wind-down—acting as the technical pivot between CPAs, advisors, law firms, and financial institutions.

**REMOTE BY DESIGN.** *Global agility, seamless execution.*

**EXPERTISE BY DEFAULT.** *Providing the technical pivot for senior advisors.*

**QUALITY OVER QUANTITY — ALWAYS.** *Selectivity as a guarantee of focus.*



## SENIOR LEADERSHIP



# A Legacy of Technical Rigor.

Founded by Güendalina Toscano, Attorney at Law, holder of the STEP Certificate in International Trust Management, **FIDUCIAE** translates over 25 years of cross-border execution into a senior-led boutique practice specialized in high-stakes governance.

Our institutional heritage is built on a foundation of rigorous legal discipline, developed during a formative decade at **Posadas, Posadas & Vecino**—one of **Uruguay's** most traditional and prestigious law firms. This technical precision was later applied to the UHNW segment at **Dartmouth International**, where Güendalina served in a senior role with a physical presence in **Uruguay and São Paulo**, managing complex family office structures for the Brazilian market.

Her expertise in sophisticated frameworks was further refined at **Intertrust (Luxembourg)**, before being appointed Team Lead for global **BVI & Bahamas** portfolios at **Citco (Uruguay)**. This trajectory across the world's most demanding jurisdictions has shaped a unique capacity for multi-layered execution.

Today, **FIDUCIAE** acts as the technical pivot that ensures international structures remain compliant, operational, and bank-ready—**bridging the gap between strategic intent and operational reality.**



# FIDUCIAE

Digital-native governance.

Non-traditional.

Precision-driven.



## WHO WE WORK WITH

Your expertise designs the plan.  
We make sure it holds.

- Wealth advisors and family offices
- CPAs and tax advisors
- International law firms and trust counsels
- Private clients with complex cross-border assets

*The relationship stays yours. The execution is ours.*

One senior point of accountability. No delegation of judgement. No volume model.

### BACKED BY A TRUSTED NETWORK

#### Registered Agents

BVI · Bahamas · Cayman · Panama · Nevis  
Belize · Anguilla · US · Canada

#### Local Correspondents

Notaries, apostille services and  
regulatory liaisons — LATAM & Europe

#### Banking Coordinators

International account opening  
and KYC support specialists

#### Legal & Compliance Network

Jurisdiction-specific counsels  
engaged on a mandate basis

**Senior judgment at the center.  
A vetted network at the execution layer.**



## LIFECYCLE INTERVENTION

# We operate at every critical stage.

<p><b>01</b></p> <p><b>Incorporation &amp; Inception</b></p> <p>Entity and SPV formation. Bespoke documentation and governance frameworks.</p>	<p><b>02</b></p> <p><b>Takeover of Existing Structures</b></p> <p>Senior assumption of ongoing mandates from prior providers.</p> <p><i>*Includes Structural Audit as entry point*</i></p>	<p><b>03</b></p> <p><b>Governance &amp; Restructuring</b></p> <p>Reviews, amendments, reorganizations, cross-border mergers and spin-offs.</p>	<p><b>04</b></p> <p><b>Redomiciliation</b></p> <p>Cross-border transfers of domicile with full regulatory coordination.</p>	<p><b>05</b></p> <p><b>Wind-Down</b></p> <p>Orderly dissolution and liquidation. Documentation and filing closure.</p>
--	--	--	---	--

*Engagements are accepted selectively — where precision matters and senior involvement is non-delegable.*

***FIDUCIAE** acts as the technical pivot between advisors, law firms, registered agents, banks and service providers.*

## SERVICES

# Implementation. Governance. Continuity.



### 01 Incorporation & Maintenance

Entity and SPV formation, lifecycle documentation and annual compliance.

### 02 Annual Corporate Compliance

Corporate renewals, Economic Substance filings and other regulatory submissions.

### 03 Directors, Members and UBO Registration and update

Registers of directors, members and beneficial owners filings across jurisdictions.

### 04 Corporate Documentation

Shareholder agreements, capital adjustments, intra-group loans, statutory amendments and full documentary packages for cross-border mergers and reorganizations.

### 05 Cross-Border Documentation

Notarial coordination, apostilles, legalization and international instrument recognition.

### 06 Banking Coordination

Senior documentation and KYC support for bank-ready structures.

### 07 Structural Transitions

Cross-border mergers — by absorption and by incorporation of a new entity — spin-offs, divisions and carve-outs. Redomiciliation of existing structures. Succession from prior corporate service providers. Governance reviews, restructurings and orderly wind-downs.

### 08 Vessel Registration

Marshall Islands registrations requiring jurisdictional precision and regulatory coordination.

*FIDUCIAE does not provide accounting, investment advisory, fiduciary custody or banking services. These functions remain client- or advisor-led.*

09

### Structural Audit

STANDALONE · FIXED FEE

Independent senior review of an existing structure — documentary completeness, Economic Substance compliance, company registers, governance alignment and banking readiness. A clear written report. No ongoing mandate required.

## STRUCTURAL AUDIT

**Most structures  
are designed right.**

**Few stay that way.**

*The gap between original design and current reality is where regulatory exposure, banking blockage, and governance failure live — quietly, until they don't.*

**A fixed-scope, fixed-fee engagement.  
A clear deliverable. No open mandate  
required.**

*Available standalone — or as the entry  
point to a full implementation mandate.*



## The Audit Covers:

- Documentary completeness and internal consistency
- Beneficial ownership registers and UBO filings
- Economic Substance compliance by jurisdiction
- Banking and KYC readiness
- Governance alignment and operational continuity
- Regulatory exposure and outstanding filings

## Who it is for:

- Wealth advisors seeking an independent second opinion before assuming, presenting or inheriting a client structure
- Clients undergoing residence change, succession planning, or regulatory transition
- Anyone taking over or inheriting an existing structure from a prior provider

**Deliverable:** A senior-signed written report. Actionable. Confidential. Fixed fee.



## JURISDICTIONAL SCOPE

We operate where legal stability is non-negotiable.



### OFFSHORE & CARIBBEAN

BVI · Bahamas · Cayman Islands · Panama  
Nevis · Belize · Anguilla

---

### NORTH AMERICA

United States · Canada

---

### ASSET-LINKED REGISTRATIONS

Marshall Islands (vessel registration)

---

### LATIN AMERICA & EUROPE

Coordination and implementation  
across LATAM and selected European jurisdictions

*FIDUCIAE does not engage with structures involving capital from sanctioned, collapsed or high systemic-risk jurisdictions.*

## FEE MODEL



# No hourly billing. No scope drift. No surprises.

## SCOPE

### AGREED IN ADVANCE

---

Scope is defined and agreed before work begins. Both parties know exactly what is being delivered — no ambiguity, no moving targets.

## FEES

### PAID UPFRONT

---

No open meters running in the background. Cost certainty from day one. The engagement begins only when terms are clear.

## ZERO

### HOURLY BILLING

---

Services are priced per deliverable, not per hour. Efficiency and precision benefit the client directly.

***FIDUCIAE** accepts a limited number of mandates at any given time. This is not a volume model — it is a precision model.*



[gtoscano@fiduciae.net](mailto:gtoscano@fiduciae.net)

[www.fiduciae.net](http://www.fiduciae.net)