



CASE STUDY FOR THE IBSA 2018 CONFERENCE

CosiPod is a company formed by Maurice Brightman, an architect, who has designed easily assembled and dismountable modular accommodation primarily for students. This is capable of being moved from one site to another at minimal cost, due to the development of a unique method of installation, removal and re-installation elsewhere. The concept is to rent land awaiting development and planning approval from developers for a limited period (minimum three years), to construct student accommodation from easily erected tubular and plastic products, and to lease the accommodation to nearby schools and universities on an annual basis. The accommodation may also be leased to local authorities to house those in temporary need. The products do not have to be amortised over the lease period since they can be erected elsewhere at costs which have been calculated to allow multiple use and location of such products. The benefit to developers is the rental income they receive during the fallow years of development projects being fully acquired and planned.

The concept and installation methodology has been created by Maurice, and he has sought advice as to what his **intellectual property rights** are, and how they may be protected (**Session 1**). The products are sourced in Mozambique where Maurice lived for many years, from a company which has entered into an exclusive contract of supply for the European Union and North America, subject to minimum quantities being ordered and a significant initial down payment required, which will require financing. Any financier will need to understand the **international business structure** Maurice wishes to create, which minimises tax leakage, particularly during the development stage (**Session 2**).

Various financing ideas are then pursued, including the concept of creating CosiPod's own **cryptocurrency** which would appeal to students and their families (**Session 3**). Having secured the IP rights, finance and products, the company now starts marketing the concept through agents in the territories covered by the supply agreement. With the need to have certainty of the tax implications of the business structure created, Maurice seeks the advice of specialists as to whether tax rulings obtained and the terms of double tax treaties on which they have placed reliance could be ignored by tax authorities in light of **BEPS and other OECD initiatives**, and what their remedies could be (**Session 4**).

The IBSA are very proud to be holding a unique and very special after lunch presentation by the world acclaimed London Mozart Players, using their musical skills to demonstrate a powerful metaphor of team building and leadership for the CosiPod management and employees (**Session 5**).

Now that the business is a major multinational concern, operating in many countries where the rule of law is not always followed as religiously as the family would wish, Maurice and his family want to **protect their privacy** as much as possible and are concerned about disclosure requirements following the development of anti-money laundering legislation. They are also concerned about **protecting their database** and the integrity of their computer systems **(Session 6)**.

Over the following years, CosiPod proves a great success and the family now wish to diversify their interests beyond a single business line. Their experience is based on eco-friendly businesses and they now want to **create a Fund** with other investors for what they term ethical investments. And as Maurice gets older, he seeks advice on the creation of a Family Charter to determine how his business interests can be split between his adult children, and how the Fund could become a charitable foundation **(Session 7)**.

This case study is the basis for the IBSA 2018 conference and gives some idea of the practical nature of IBSA's discussion group meetings and conferences. Unlike most conferences, each session will have a moderator and two or three presenters. The presenters will introduce the topic of the session using the case study as an illustrative basis, and the moderator will then invite comments and questions from the delegates attending, much like the standard and very successful discussion group meetings held by the various IBSA branches throughout the year. The idea of the case study is to have a basic concept for discussion rather than a detailed business proposal!

