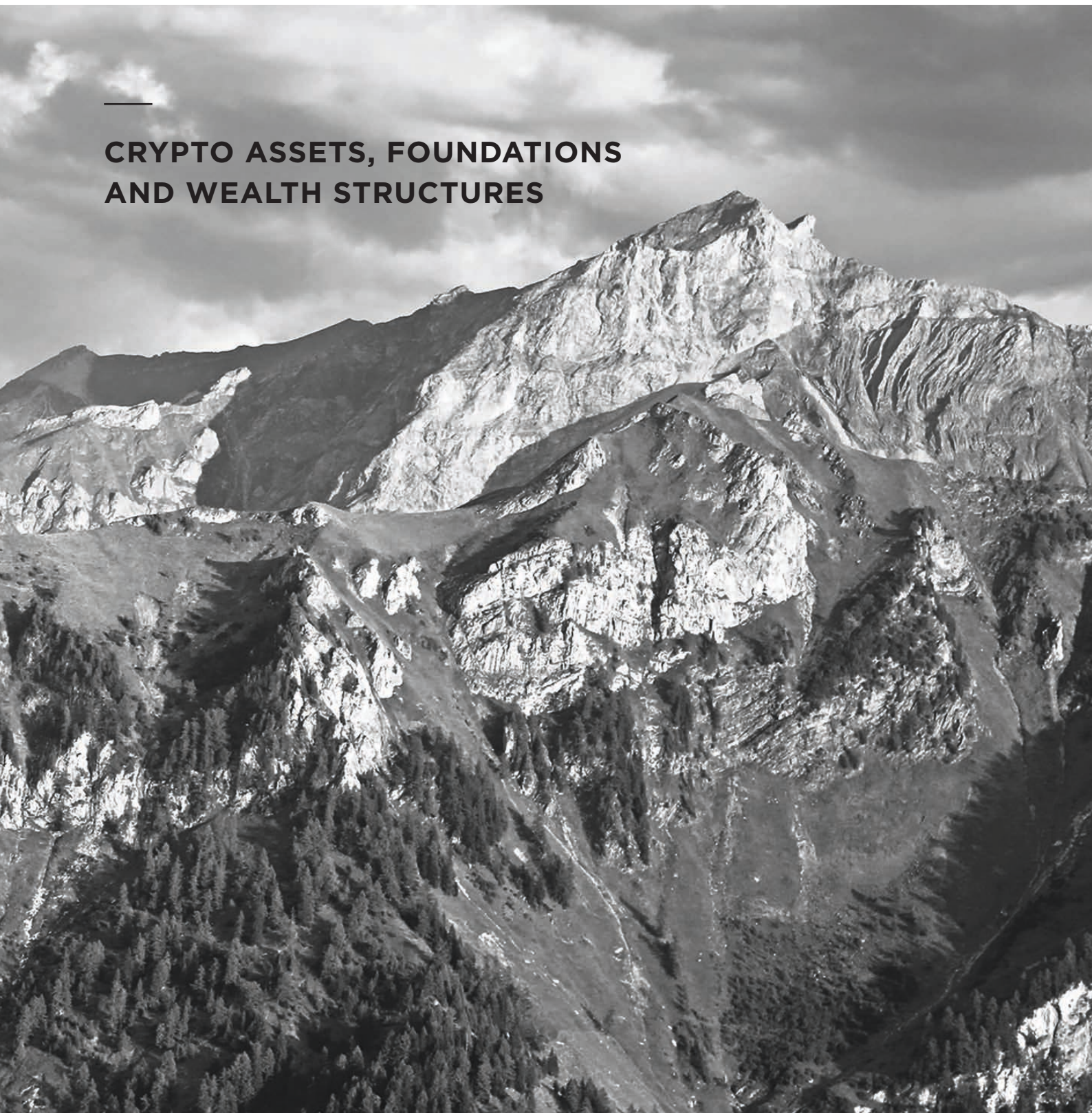




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**CRYPTO ASSETS, FOUNDATIONS  
AND WEALTH STRUCTURES**



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## DIGITAL WEALTH AS A STRUCTURING CHALLENGE

The rise of crypto assets has created a new category of private and entrepreneurial wealth that often differs fundamentally from traditional financial holdings. Crypto wealth is frequently held directly by founders, early investors, or entrepreneurial families through wallets, private keys and informal governance structures that may function efficiently during a growth phase but often reveal significant weaknesses over time. Questions of succession, legal ownership and emergency access are frequently unresolved.

For internationally minded wealth owners, this creates a structural challenge.

Digital assets may be technologically transferable and globally mobile, yet they still require a stable legal framework if they are to be preserved across generations, integrated into broader wealth planning, and presented in a manner that is intelligible to financial counterparties, fiduciaries and supervisory authorities.

In this respect, the issue is no longer merely one of technology or investment strategy. It has become a matter of legal structuring, long-term governance, and the orderly organization of wealth.

Liechtenstein is particularly well positioned to address these questions. Its legal framework combines a sophisticated foundation and wealth-structuring tradition under the Persons and Companies Act (PGR) with a modern regulatory understanding of tokenized and crypto-based assets (MiCAR and TVTG).

This makes it possible to develop structures in which digital wealth is part of a coherent and durable legal and governance architecture.

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## THE LIECHTENSTEIN FOUNDATION: A CHARTER FOR DIGITAL WEALTH

A Liechtenstein foundation under Art. 552 §§ 1 et seq. PGR is a legally and economically independent pool of assets dedicated by the founder to a defined purpose.

From a structuring perspective, this feature is of central importance. It allows assets to be detached from the personal sphere of the founder and embedded into an autonomous legal framework with its own governance, beneficiaries, and internal rules.

This basic logic is especially attractive in the context of crypto assets. Digital wealth is often highly personal in its operational reality because access may depend on one individual, one device, one set of credentials, or one founder's undocumented intentions.

However, the foundation model counteracts this concentration of risk. It permits the founder to define the purpose of the structure, determine beneficiaries, allocate powers among governing bodies and establish long-term principles for administration and control. In this sense, the PGR foundation offers not merely an ownership shell, but a governance instrument for legally organizing digital wealth over time.

The Liechtenstein foundation law is particularly suitable for such purposes because of its flexibility. The foundation deed may be supplemented by bylaws and regulations, and the internal organization may include additional bodies alongside the foundation council, depending on the needs of the structure. This makes it possible to align the legal architecture of the foundation with the practical realities of crypto wealth.

The PGR therefore provides not only asset segregation but also the legal vocabulary for robust and durable governance.

This can be clearly illustrated using two examples of business models:

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## **THE CRYPTO WEALTH, GOVERNANCE AND SUCCESSION FOUNDATION**

A Liechtenstein foundation – as well as a Liechtenstein trust – may be designed as a long-term holding and succession vehicle for substantial crypto wealth. Its commercial proposition is not the promotion of speculative products or token returns. Rather, it is the professional structuring of digital assets in a form that is legally stable and suitable for interaction with regulated intermediaries.

In this model, the founder contributes crypto-related wealth into a foundation structure. The purpose of the foundation may be defined in private-benefit terms, for example as the orderly preservation, administration, and intergenerational transfer of family wealth. The beneficiaries may be individual family members, classes of descendants, or other selected persons. The foundation council administers the structure in accordance with the foundation documents, while additional governance mechanisms may be introduced where appropriate.

The practical value of such a structure lies in the fact that it replaces informal wallet control with institutionalized legal order. Instead of depending entirely on the technical or personal discipline of one holder, the assets become subject to a framework in which access, control, decision-making, and succession can be

documented and governed. This is particularly relevant where large concentrations of digital wealth exist, where multiple family members or business partners are involved, or where future incapacity, death or disputes must be anticipated well in advance.

For clients who have created significant value through digital assets but now seek resilience, continuity, and institutional readiness, the model offers a highly credible solution.

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## **THE TOKEN-ENABLED PURPOSE OR PHILANTHROPY FOUNDATION**

A second example uses the Liechtenstein foundation not primarily as a private holding vehicle, but as a purpose-driven structure that combines the legal certainty of foundation law with the transparency and engagement potential of blockchain-based tools. In this model, the foundation serves as the central legal institution for a defined charitable, community-oriented, educational, cultural, or otherwise purpose-related activity, while token-based – or blockchain-supported elements – are used to improve documentation, participation and-or donor engagement.

This concept is particularly attractive because it avoids one of the major weaknesses of purely decentralized or informally organized impact structures, namely the absence of a stable legal core. A Liechtenstein foundation under the PGR offers independent legal personality, dedicated assets, and a clearly stated purpose. Depending on its design, it may be established as a public-benefit or private-benefit structure. In either case, the foundation remains the central organizing entity, while digital tools may be used to support reporting, internal participation

mechanisms, evidence of contribution, or community access rights.

A token layer in such a model would therefore not necessarily serve as an investment instrument. Instead, it could function as a membership feature, a digital proof of donation, a governance participation tool within carefully defined limits, or a technological mechanism for strengthening transparency around the use of funds. The commercial proposition would lie in structuring and operating a legally robust foundation platform that speaks both the language of traditional wealth and the logic of digital communities.

The attraction of Liechtenstein in this context lies again in the combination of legal tradition and modern structuring flexibility. The PGR foundation allows assets to be dedicated to a lawful purpose and administered by a foundation council under a clearly defined governance framework. In commercial terms, this second model can be offered as a structuring and implementation platform for impact-oriented founders, philanthropically motivated crypto holders, international donor communities, or Web3 projects seeking a more credible institutional wrapper.

The services behind may include legal design of the foundation, purpose definition, governance architecture, regulatory analysis of the token component, operational implementation, and ongoing administration.

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## **THE FOUNDATION OR TRUST AS THE LEGAL BASE LAYER OF A BLOCKCHAIN OR DECENTRALIZED AUTONOMOUS ORGANIZATION (DAO)**

Beyond their conventional use in wealth planning and succession, Liechtenstein foundations and trusts may also serve as the legal base layer of a blockchain-based or DAO-oriented governance architecture. In this context, the reference to a layer one should not be understood in a purely technical sense, as if the foundation or trust were to replace the protocol layer of a blockchain. Rather, the point is that a Liechtenstein legal structure can function as the primary institutional and normative layer upon which decentralized governance, token-based participation, treasury administration, and long-term project continuity are built.

Many blockchain projects and DAOs operate effectively on-chain, yet remain structurally vulnerable off-chain. They may have a community, governance tokens and some kind of voting logic, but no stable legal person capable of holding assets, protecting intellectual property or enforcing claims. A Liechtenstein foundation or, where more suitable, a Liechtenstein trust can close precisely this gap by providing a durable legal and governance wrapper for a decentralized ecosystem without necessarily undermining its technological or community-driven character.

A Liechtenstein foundation is especially well suited where the project requires an independent legal person with dedicated assets and a defined constitutional purpose. It may hold protocol-related assets and governance rights, while its constitutional documents and supplementary regulations can define how on-chain votes, multisig-arrangements, community proposals, or token-holder participation are to be reflected within the legally binding decision-making of the foundation bodies. In this way, the foundation may

operate as the institutional anchor of a DAO: not as a contradiction to decentralization, but as its legal stabilizer and external interface.

A Liechtenstein trust may, in turn, be attractive where the emphasis lies more strongly on fiduciary administration, ring-fenced asset holding, or the separation between formal legal control and economically or functionally allocated benefit. In suitable structures, a trustee may hold wallets connected to a protocol treasury on terms that are defined by the trust deed and any associated governance arrangements. This can be particularly useful where a project seeks a high degree of internal flexibility, confidential structuring, or a more tailored allocation of powers between settlor, trustee, protector, and beneficiaries or purpose-related stakeholders.

In both cases, the decisive advantage lies in the ability of Liechtenstein law to translate block-chain-native governance into legally intelligible architecture. A foundation or trust can provide continuity where token holders change, legal certainty where code alone is insufficient, and institutional credibility where third parties require a recognizable counterpart. Properly designed, such a structure does not need to negate the logic of decentralization. On the contrary, it may preserve and operationalize it by ensuring that the protocol and the project's long-term purpose are embedded in a legally robust and sustainable framework.

For internationally oriented founders and digital communities, this opens a compelling structuring proposition. A Liechtenstein foundation or trust may thus function as the legal governance layer of a blockchain or DAO ecosystem: a base institutional layer that connects on-chain coordination with off-chain enforceability, and decentralized participation with enduring legal order.

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## STRUCTURING CONSIDERATIONS IN PRACTICE

In practical terms, the success of foundations depends on the careful interaction of foundation law, tax considerations, internal governance, banking documentation and financial market regulation.

Accordingly, a crypto wealth foundation shall be designed in a way that clearly separates legal ownership, governance rights, operational access and, where necessary, services provided by external custodians or other regulated intermediaries. Similarly, a token-enabled purpose foundation must be structured so that the token component remains legally coherent with the foundation's purpose and does not create unintended regulatory consequences.

In both cases, the business model is strongest where digital-asset logic is translated into institutional legal form without losing entrepreneurial adaptability. This is where the interaction between fiduciary structuring, tax analysis, foundation law, and financial regulatory assessment becomes decisive.

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## HOW FS+P PROVIDES PRACTICAL SUPPORT

FS+P, a Liechtenstein-based fiduciary and advisory firm, specializes in structuring wealth from a legal, tax, and governance perspective in a way that ensures long-term resilience and sustainability. For clients with a background in crypto and FinTech, FS+P bridges the practical realities of digital assets with the need for legal robustness, regulatory compatibility, and documentation that is suitable for banking and institutional counterparties.

FS+P draws on the legal expertise of Bergt Law, particularly in relation to foundation and succession law issues, cross-cutting matters of financial market regulation, and the assessment of obligations arising under the TVTG and MiCAR in the individual case. This combination allows complex structures to be developed in a manner that is not only conceptually sound, but also workable in practice and defensible from a legal and regulatory perspective.

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## THE AUTHORS

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With this combination of fiduciary, legal, and tax structuring expertise, practical digital asset experience, and specialized legal and regulatory know-how, FS+P and Bergt Law support clients in establishing crypto wealth structures that are legally robust, tax-organized, properly documented for banking purposes, and fit for intergenerational planning.



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