

Criminal Tax Cases & White Collar Defense

Tax fraud cases present unique factual, legal and tactical issues. Since the founding of Caplin & Drysdale, the firm has had a robust practice in this highly specialized area. Such cases include not only active criminal tax investigations, but also sensitive civil tax matters where fraud may be an issue and voluntary disclosures for taxpayers who want to clean up their tax issues before the IRS finds them. The firm has concluded many successful representations for clients who have, or are concerned about, potential criminal tax issues.

Areas of Focus

Handling Criminal Tax Investigations

The IRS and the Department of Justice (DOJ) focus on a few thousand taxpayers each year, looking for violations of the specific federal criminal provisions that punish tax evasion and related conduct. These cases can include issues relating to personal and corporate income taxes, employment taxes, estate and gift taxes, tax shelters, conservation easements, micro-captive insurance entities, unreported foreign assets and accounts, cryptocurrency, and inquiries into tax professionals and return preparers.

For decades, Caplin & Drysdale has been one of the preeminent law firms with attorneys, including former senior IRS and DOJ officials, who specialize in the complex area of criminal tax investigations. Our objective in these cases is always to attempt to persuade the IRS and the DOJ not to bring criminal charges and to handle the case as a civil tax matter. We represent clients during all phases of such cases, from an initial, and often sudden appearance by Special Agents in the IRS Criminal Investigation Division, through the DOJ's decision whether to indict and in subsequent litigation. The firm has worked on many of the most complex criminal tax investigations in the last 50 years – a great number of which have stayed out of the public eye because we have succeeded in our clients avoiding criminal charges.

Among many examples of Caplin & Drysdale's successful criminal tax representations are these:

- Represented a wealthy private equity executive in an investigation arising from the creation and use of a nine-figure foreign trust. The Department of Justice entered into a rare "Non-Prosecution Agreement" whereby the individual avoided criminal charges, and the IRS agreed to a corollary civil tax settlement.
- Represented the CEO of a public company under criminal tax investigation involving substantial allegedly personal expenses. After a conference and a series of submissions, the Tax Division declined to authorize an indictment and sent the case back to the IRS for civil processing.
- Represented a public company whose CEO was targeted by an internal whistleblower who alleged that he had engaged in personal tax evasion. After we supervised an internal review of the matter and presented our findings to the investigating IRS agent and prosecutor, the matter was dropped.
- Represented a locally well-known physician in an alleged criminal gift tax fraud scheme and persuaded the Tax Division not to bring charges based on the doctor's reliance on tax advice he had received.
- Represented the founder of a well-known consumer product brand in a case involving unreported foreign accounts of over \$100,000,000 and following a guilty plea, obtained a sentence of probation, years less than the sentencing guidelines range.

- Represented a major international bank in connection with a sweeping criminal tax investigation into certain tax shelter transactions marketed and sold to the bank's wealthy clients. After a series of presentations to federal prosecutors and IRS agents, the government agreed to enter into a Deferred Prosecution Agreement, and the bank avoided criminal charges.
- Represented a professor of business in a case involving unreported foreign accounts of over \$200,000,000 and following a guilty plea, obtained a sentence of seven months, significantly less than the sentencing guidelines range.
- Represented a tax return preparer who prepared thousands of returns over a four-year period in negotiating plea for illegal reporting of false or inflated Schedule A and Schedule C deductions for the individual's clients. Through substantial advocacy and tactful consultation with the government was able to convince the court to order a sentence of home confinement (no incarceration) which was a substantial departure from the guidelines range of 24 to 30 months.
- Successfully represented numerous Swiss banks in connection with their participation in the Department of Justice Swiss Bank Program, resulting in non-prosecution agreements for each client and a significantly mitigated monetary payment.

Consulting with Other Professionals on Criminal Tax Matters

Criminal tax cases represent a highly specialized area of practice. Caplin & Drysdale has always taken pride in our work with other lawyers where we play a consulting role to the client's primary criminal or litigation counsel, bringing to the case our knowledge of legal, factual, and tactical issues that are unique to criminal tax matters. These cases can range from inquiries about criminal tax issues that arise prior to any investigation to consultations on active federal and state investigations.

Our firm has been proud to be associated with some of the top U.S. and global law firms in helping to advise clients on potential or ongoing criminal tax matters. We are often brought in by these firms to help, and we also have access to the same network of firms for clients whose cases raise legal issues in other parts of the U.S. or around the world. We continue to enjoy our relationships with our professional colleagues, and we always strive to collaborate in a collegial team environment working for the client's best interest. Some of our most significant and successful case results have occurred in such collaborations.

Appearing Before the DOJ Tax Division and U.S. Attorney's Offices

The process of a criminal tax investigation is unique in the federal system in that the Tax Division, which is headquartered in the Department of Justice in Washington, plays a significant role in nearly every case. In some cases, prosecutors from the Tax Division handle and/or supervise the investigation. In most cases DOJ Tax Division prosecutors will make the ultimate decision whether to ask a grand jury for a criminal indictment. Caplin & Drysdale attorneys have decades of experience interacting with the Tax Division, conferring with their prosecution teams and reviewing attorneys, advocating for our clients that criminal charges should not be brought, and obtaining criminal declinations.

Criminal tax cases also often involve active participation by local U.S. Attorney's offices, frequently with prosecutors who are specialized in tax and white collar matters. Caplin has appeared before dozens of U.S. Attorney's offices, frequently with colleagues at local law firms, to seek a favorable outcome for taxpayers under investigation.

Representations in White Collar Financial Criminal Cases

Criminal tax investigations, on occasion, are part of a broader criminal inquiry by the Department of Justice or IRS. In addition to the focus on tax issues, an investigation might include other alleged financial improprieties involving for example fraud generally (wire/mail/bank), money laundering, securities fraud, foreign corrupt practices, or public corruption. A typical “white-collar” financial investigation can broaden as investigators gather additional financial information. Such a case may involve only the IRS as the investigative agency because the IRS has jurisdiction in areas like money laundering or Bank Secrecy Act violations or the case may include another investigative agency such as the FBI.

Caplin & Drysdale attorneys frequently encounter these broader investigations and usually handle all aspects of these cases, because the potential tax violation is often closely intertwined with the other alleged improper financial conduct. In cases where our client would benefit from other specialized expertise, such as a securities matter, we readily and frequently pair with counsel from another firm to provide the most comprehensive and effective defense possible.

Advising Third Party Witnesses in Criminal Tax and White-Collar Cases

Criminal investigations of alleged financial crimes, such as tax or other white-collar matters, almost invariably involve efforts to interview third party witnesses, such as accountants, bookkeepers, business partners, or attorneys. Our attorneys regularly represent such individuals during the course of an investigation and potential interview. These representations often include determining the exact status of the witness and responding to subpoenas for relevant records, all while obtaining any appropriate legal protections, such as possibly limited immunity. We have substantial experience in handling sensitive privilege issues that can arise where legal advice is an issue in the case. Depending on the nature of the investigation, we may collaborate with counsel for the target or for other parties under common interest arrangements. Or often, as counsel to the principle subject, we are coordinating representation as effectively and efficiently as possible for multiple such third party witnesses.

Supervising Internal Investigations into Tax and Related Issues

When a business organization becomes aware of possible criminal conduct in connection with the entity's business activity, Department of Justice policies incentivize quick action by the C-suite to ascertain what happened, determine an overall strategy, and take appropriate action against any wrongdoers. Caplin & Drysdale attorneys have advised many companies, professional firms, and related types of entities in such cases, either alone or as part of a larger team where we consult on specific criminal tax matters. There are important and sensitive issues relating to the attorney-client and work product privilege that require careful thought at the inception of such cases. Moreover, the Department of Justice is likely to scrutinize the manner in which such an investigation is conducted as well as its results. An effective and meaningful internal investigation can sometimes make the difference in a prosecutor's decision whether to indict a business organization or to enter into a non-criminal disposition, so it important that any internal review is done correctly and without interference.

Addressing Federal Sentencing Questions

Notwithstanding our best efforts, some criminal tax cases move forward either to indictment, trial or plea, and our clients may face the potential of a criminal sentence. Federal law requires a judge to fashion a sentence that takes into consideration numerous factors including the gravity of the crime and the need for deterrence, but the judge must also recognize the personal situation of the defendant. The Court is also required to consider the federal Sentencing Guidelines, which in criminal tax cases, can raise unique and challenging issues. For a defendant facing sentencing, it is important that the judge understand any mitigating circumstances that would justify a lesser sentence of incarceration such as home confinement or even probation and that is not so punitive financially that it renders the defendant unable to get back on their feet once they have completed their sentence.

An important component of all of our firm's criminal tax representations is developing a strategy for minimizing the risk of incarceration, stiff penalties, and financial restitution. Evaluating a client's potential exposure in light of the nature of the case, the applicable Sentencing Guidelines, and possible mitigating factors will help the client understand a range of scenarios, and it will, with our advice, help guide the client through the difficult decision points that present themselves in any criminal tax matter. Similarly, understanding how to use a client's charitable history or Sentencing Guideline departures – such as those for cooperation (§5K1.1) or loss of a caretaking function (§5H1.6) – to ameliorate the client's potential exposure is critical to an effective representation.

Caplin & Drysdale attorneys have spent decades guiding clients through criminal proceedings and using a combination of experience, advocacy, and ingenuity have helped clients achieve sentencing outcomes that allowed them to get on with their life sooner and be well positioned for the future.

Voluntary Disclosures regarding Tax Crimes

The U.S. tax system depends on taxpayers voluntarily meeting their tax obligations. There are stiff civil penalties and potential criminal sanctions associated with the failure to meet these obligations. By far, the best time to address any deficiencies is before contact by the IRS, especially before being visited by IRS Special Agents, who conduct criminal tax investigations. If an audit or criminal investigation has commenced, the option of a voluntary disclosure is no longer available.

For many years both the IRS and Department of Justice through their respective voluntary disclosure policies and practices have welcomed taxpayers who wish to correct prior filings if they do so in a truthful, accurate, and timely manner. Such a voluntary disclosure will effectively preclude the initiation of a criminal investigation and prosecution and may reduce civil penalties. Guiding a client successfully through the voluntary disclosure process often requires addressing complex issues, so working with the right lawyer can mean the difference between a successful non-criminal resolution or potentially severe criminal and civil consequences.

In the last decade the IRS made a significant effort to formalize the voluntary disclosure process with respect to both domestic and international matters. This formalization of the process, however, has not made it easier to qualify for a voluntary disclosure, and there is no guarantee that simply entering into a voluntary disclosure assures that a taxpayer will receive the leniency contemplated by the program or even avoid a criminal investigation. Our attorneys are well versed on the extensive requirements for entering the IRS's voluntary

disclosure program today, and that is particularly helpful to minimizing the client's overall costs.

Caplin & Drysdale's skilled group of lawyers have decades of experience handling voluntary disclosures for our clients and have successfully guided several thousand clients through their disclosures in recent years.

Related Practices

Tax Disputes & Tax Litigation

News & Insights

NEWS

Niles Elber Discusses Impact of IRS Receiving Billions in New Funding on Bloomberg Tax Talking Tax Podcast
Bloomberg Tax Talking Tax, 01.12.2023

U.S. News – Best Law Firms Recognizes Caplin & Drysdale as a Top-Tier Firm
Awards & Rankings | 11.03.2022

Tax Notes Quotes Scott Michel on Attorney-Client Privilege
Tax Notes, 10.11.2022

Caplin & Drysdale Elects Two New Members
10.03.2022

Financial Planning Quotes Niles Elber on Upcoming Decision in *Bittner v. United States*
Financial Planning, 10.03.2022

Washingtonian Magazine Names Seven Caplin & Drysdale Attorneys to Top Lawyer Lifetime Achievement List
09.01.2022

“Best Lawyers in America” Names Caplin & Drysdale Attorneys as Leaders in Their Field
Awards & Rankings | 08.18.2022

Victor Jaramillo Talks to Bloomberg Tax on Foreign Account Penalties
Bloomberg Tax, 06.22.2022

Caplin & Drysdale Attorneys Recognized by Legal 500
Awards & Rankings | 06.10.2022

Chambers USA Recognizes Caplin & Drysdale Attorneys in 2022 Edition
Awards & Rankings | 06.03.2022

Super Lawyers® Recognizes Caplin & Drysdale Attorneys Among Washington's Top Lawyers
Awards & Rankings | 05.02.2022

Scott Michel Comments on the Tracing of Russian Assets in *The Hill*
The Hill, 03.15.2022

Mark Matthews Weighs in on *Zuhovitzky v. UBS* in *Tax Notes*
Tax Notes, 01.03.2022

Scott Michel Talks to Bloomberg Law on Offshore Bank Accounts

Bloomberg Law, 12.03.2021

Caplin & Drysdale Earns 10 Tier 1 Practice-Area Rankings in 12th Edition of *U.S. News – Best Law Firms®*

Awards & Rankings | *U.S. News & World Report*, 11.04.2021

Mark Matthews Weighs in on Tax Enforcement Announcements in Tax Notes

Tax Notes, 11.02.2021

Victor Jaramillo Comments on Cryptocurrency Crackdown in Bloomberg Law

Bloomberg Law, 08.24.2021

Caplin & Drysdale Attorneys Listed as "Best Lawyers In America"

Awards & Rankings | 08.19.2021

Mark Matthews Talks to Law360 on Recent IRS Enforcement of FBAR Penalties

Law360 Tax Authority, 08.06.2021

Scott Michel and Mark Matthews Joined Public Radio Station KPCW's Mountain Money to Discuss Biden's Plans for the IRS

KPCW's Mountain Money, 07.19.2021

Scott Michel Comments on Weisselberg Case in The Hill

The Hill, 07.04.2021

TIME Quotes Mark Matthews on Programs Overwhelming the IRS

Time, 06.29.2021

New York Times Quotes Cono Namorato Investigation into Trump Executive

New York Times, 06.16.2021

Legal 500 Recognizes Caplin & Drysdale Attorneys

Awards & Rankings | 06.10.2021

Chambers USA Recognizes Caplin & Drysdale Attorneys

Awards & Rankings | 05.20.2021

Scott Michel Comments on Swiss Life Settlement with DOJ in Tax Notes

Tax Notes, 05.16.2021

7 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation May Meeting

04.30.2021

Super Lawyers® Names Caplin & Drysdale Attorneys Among D.C.'s Most Prominent Practitioners

Awards & Rankings | *Super Lawyers*, 04.29.2021

Mark Matthews Weighs in on Lessons Learned From Pandemic Fraud

Bloomberg Law, 02.09.2021

Tier 1 Rankings for Caplin & Drysdale's Practice Groups in *U.S. News – Best Law Firms' List*

Awards & Rankings | *U.S. News & World Report*, 11.05.2020

Mark Matthews Comments on IRS Investigating NRA in WSJ

The Wall Street Journal, 10.05.2020

Caplin & Drysdale Earns Top Ranking in 2021 "Best Lawyers in America"
Awards & Rankings | *U.S. News & World Report*, 08.20.2020

Tax Notes Quotes Mark Matthews on IRS Criminal Investigation Division Chief
Tax Notes, 08.04.2020

Mark Matthews Comments on IRS Criminal Investigation Division Chief in Tax Notes
Tax Notes, 07.13.2020

17 Caplin & Drysdale Attorneys Recognized in 2020 Legal 500 Ranking
Awards & Rankings | *The Legal 500*, 07.06.2020

6 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation Virtual May Meeting
06.29.2020

Chambers USA Recognizes Caplin & Drysdale Attorneys
Awards & Rankings | 05.05.2020

Caplin & Drysdale D.C. Attorneys are Recognized by Super Lawyers®
Awards & Rankings | *Super Lawyers*, 05.04.2020

Mark Matthews Speaks to Law360 on IRS Redesign and Criminal Investigation Division
Law360 Tax Authority, 04.17.2020

Law360 Quotes Mark Matthews on Uptick in Virus Payment Fraud
Law360, 04.03.2020

Christopher Rizek Comments in Politico on Companies Mining Tax Data
POLITICOPRO, 02.27.2020

Law360 Quotes Mark Matthews IRS Using New Data Analytics Techniques
Law360 Tax Authority, 02.13.2020

Caplin & Drysdale Earns Top-Tier "Best Law Firms" Rankings in 10th Edition of U.S. News – Best Lawyers
Awards & Rankings | *U.S. News & World Report*, 11.01.2019

Washington Post Talks to Mark Matthews on IRS Mandatory Audit Program
Washington Post, 10.04.2019

Scott Michel Talks About the State of Offshore Enforcement
Law360, 08.22.2019

Mark Matthews Comments on Fraud Referrals Under New IRS Division Head in Tax Notes
Tax Notes, 08.20.2019

Caplin & Drysdale Attorneys Listed as "Best Lawyers In America"
Awards & Rankings | 08.15.2019

Mark Matthews Comments on IRS Criminal Investigation Division
MLex US Tax Watch, 08.12.2019

Mark Matthews Quoted in "Inside the IRS's Audits of the President"
POLITICO, 07.19.2019

8 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation May Meeting
05.03.2019

WSJ Quotes Mark Matthews on Trump's IRS Audit Files
The Wall Street Journal, 04.25.2019

Super Lawyers® Recognizes 22 Caplin & Drysdale Attorneys in D.C. Awards & Rankings | *Super Lawyers*, 04.22.2019

Mark Matthews & Meghan Biss Comment on Tax Impact of College Admissions Scandal
Associated Press, 04.02.2019

CNN Quotes Scott Michel and Meghan Biss on Tax Impact of College Admissions Scandal
CNN, 03.22.2019

MEDIA ADVISORY: Tax Problems Loom in the College Admissions Scandal
Caplin & Drysdale, Chartered, 03.18.2019

Wall Street Journal Quotes Scott Michel on Manafort Sentencing
The Wall Street Journal, 03.08.2019

Mark Matthews Comments on Impact of Government Shutdown on U.S. Taxpayers
Law360, 01.14.2019

10 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation Midyear Meeting
01.03.2019

Caplin & Drysdale Earns 11 Tier 1 Practice-Area Rankings in Ninth Edition of *U.S. News – Best Law Firms®* Awards & Rankings | *U.S. News & World Report*, 11.01.2018

Beth Kaufman and Mark Matthews Talk to ABC News on Trump Tax Investigation
ABC News, 10.29.2018

PODCAST: Mark Matthews Discusses the IRS and Tax Evasion with AML's John Byrne
AML Conversations, 10.10.2018

Associated Press Quotes Beth Kaufman and Mark Matthews: Probes of Trump Taxes Carry Potential for Millions in Fines
The Associated Press, 10.04.2018

POLITICO Quotes Beth Kaufman and Mark Matthews on Trump Tax Investigation
POLITICO Pro, 10.03.2018

7 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation Fall Meeting
Caplin & Drysdale, 10.02.2018

Scott Michel Discusses Offshore Voluntary Disclosure Program Shutdown with Law360
Law360, 09.28.2018

Mark Matthews Talks to Wall Street Journal on U.S. Taxpayers With Undisclosed Offshore Accounts
The Wall Street Journal, 09.14.2018

Wall Street Journal Quotes Mark Matthews: Senate Confirms Charles Rettig as IRS Commissioner
The Wall Street Journal, 09.12.2018

Scott Michel Talks to Tax Notes on Nominee to Head IRS
Tax Notes, 08.28.2018

Mark Matthews Speaks to Tax Notes on IRS Rotating Fraud Technical Advisers
Tax Notes, 08.17.2018

Caplin & Drysdale Improves Ranking in 2019 "Best Lawyers in America"
Awards & Rankings | 08.15.2018

POLITICO Quotes Scott Michel on Manafort Criminal Tax Charges
POLITICO, 08.15.2018

Caplin & Drysdale International Tax Controversy Team Receives ABA Pro Bono Award
Both | *Caplin & Drysdale, Chartered*, 08.02.2018

Mark Matthews Talks to Tax Notes on Possible Pros and Cons in Fraud Program Changes
Tax Notes, 06.20.2018

Mark Matthews Comments: IRS More Aggressive in Closing Whistleblower Cases
Bloomberg Law, Daily Tax Report, 05.30.2018

Niles Elber and Victor Jaramillo Talk to Law360 on Offshore Voluntary Disclosure Program Ending
Law360, 05.14.2018

9 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation Meeting
Caplin & Drysdale, 05.09.2018

18 Caplin & Drysdale Attorneys Recognized by Super Lawyers in D.C.
04.23.2018

Mark Matthews Comments on Moving CI Cases to Treasury
Tax Notes, 04.23.2018

Scott Michel Talks to Law360 on IRS Replacing Offshore Voluntary Disclosure Program
Law360, 04.10.2018

Scott Michel Comments on Closure of IRS Offshore Voluntary Disclosure Program
MLex US Tax Watch, 03.23.2018

Mark Matthews Comments on Closure of IRS Offshore Voluntary Disclosure Program
Tax Notes, 03.14.2018

Scott Michel Comments on Charles Rettig, Nominee to Head IRS
MLex US Tax Watch, 03.02.2018

Scott Michel Comments on Charles Rettig's Nomination for IRS Commissioner
Tax Notes, 02.09.2018

Scott Michel Comments on Money Laundering Bill's Use in Tax Cases
Tax Notes, 01.02.2018

Caplin & Drysdale Tax Lawyers Work with Croatian Ministry of Finance on Tax Enforcement Issues
12.11.2017

New York Times Quotes Scott Michel on Tax Plan's Ambiguity
The New York Times, 12.05.2017

Mark Matthews Comments: IRS Letters Will 'Nudge' U.S. Clients for Swiss Bank Data
Bloomberg BNA, 12.01.2017

Law360 Quotes Scott Michel: 'Willfulness' in Civil FBAR Cases Comes Down to the Facts
Law360, 11.21.2017

Scott Michel Comments on FBAR Penalty Examinations
Bloomberg BNA Daily Tax Report, 11.07.2017

Tier 1 Rankings for Caplin & Drysdale's Legal Services in 2018 U.S. News – Best Law Firms' List
Awards & Rankings | *U.S. News & World Report*, 11.01.2017

Scott Michel and Chief Judge Paige Marvel Discuss Increase in International Tax Enforcement Cases at Tax
Controversy Conference
Tax Notes, 10.30.2017

Scott Michel Speaks With U.S. Tax Court Chief Judge on Increased Global Tax Litigation at ITEC Session
Bloomberg BNA, 10.30.2017

Tax Notes Quotes 3 Caplin Tax Controversy Attorneys on the IRS's Aggressive FBAR Enforcement
Tax Notes, 10.19.2017

Scott Michel Comments on IRS Spontaneous Disclosures
Tax Notes, 10.12.2017

Scott Michel Comments on High-Profile Foreign Bank Account Decision
Tax Notes, 10.12.2017

Bloomberg BNA Quotes Mark Matthews: IRS, Agencies Tag Team to Fight Harvey-Related Crime
Bloomberg BNA, 09.05.2017

Bloomberg BNA Quotes Mark Matthews on FATCA Status
Bloomberg BNA, 08.29.2017

Scott Michel Comments on Public Leaks Aiding in U.S. OVDP Penalty
Tax Notes, 08.18.2017

Caplin & Drysdale Earns Top Ranking in 2018 "Best Lawyers in America"
Awards & Rankings | 08.15.2017

7 Caplin & Drysdale Lawyers Listed as Leaders in Their Field by Expert Guides
Awards & Rankings | *Expert Guides*, 07.25.2017

Tax Notes Quotes Mark Matthews: Criminal Tax Attorneys Suggest CI Refocus on Traditional Cases
Tax Notes, 05.30.2017

Scott Michel Comments on Enforcement of Offshore Accounts
Tax Notes, 05.15.2017

Caplin & Drysdale Lawyers Listed Among D.C.'s Most Prominent Practitioners
Awards & Rankings | *Super Lawyers*, 04.27.2017

Scott Michel Comments on Border Adjustment Treaty Damage Hindering Tax Enforcement
Tax Notes, 03.02.2017

Scott Michel Speaks to Tax Notes on Tax Practitioners' Obligations When Advising Clients with Foreign
Accounts
Tax Notes, 01.17.2017

BNA Quotes Scott Michel: Will Trump Keep Spotlight on Multinationals' Tax Compliance?
Bloomberg BNA, 01.13.2017

Scott Michel Leads Discussion of Offshore Issues at Criminal Tax Conference
Tax Notes, 12.12.2016

Tax Notes Quotes Scott Michel: DOJ Seeks John Doe Summons on Largest U.S. Bitcoin Exchanger
Tax Notes, 11.22.2016

Caplin & Drysdale's Core Legal Services Earn Tier 1 Rankings in "Best Law Firms" for 2017 Awards & Rankings | *U.S. News & World Report*, 11.02.2016

Tax Notes Quotes Scott Michel: Non-Willfulness Not Only Streamlined Filing Claim U.S. DOJ Checking
Tax Notes, 10.31.2016

Daily Tax Report Quotes Scott Michel: IRS Goes Beyond Switzerland in Offshore Tax Enforcement Efforts
Daily Tax Report, 10.28.2016

Bloomberg BNA Interviews Scott Michel on Increased IRS/DOJ Offshore Compliance Efforts
Bloomberg BNA, 10.21.2016

Tax Notes Quotes Scott Michel on IRS Adding 47 Facilitators to Increased OVDP Penalty List
Tax Notes, 10.18.2016

Bloomberg Interviews Scott Michel: Finish Line Unclear for Some FATCA Pacts as Banks Worry
Bloomberg BNA, 09.23.2016

Scott Michel Comments on Donald Trump's Tax Returns in The Street
The Street, 08.29.2016

ACAMS Money Laundering Quotes Scott Michel on Possible Additional Required Disclosures in the UK
ACAMS Money Laundering, 08.25.2016

Bloomberg Quotes Scott Michel on Restaurateur Rowen Seibel
Bloomberg BNA, 08.19.2016

Best Lawyers in America Lists 18 Caplin & Drysdale Attorneys Awards & Rankings | *U.S. News & World Report*, 08.15.2016

Bloomberg Quotes Scott Michel on Donald Trump's Tax Returns
Bloomberg, 08.12.2016

The New Yorker Interviews Scott Michel on Trump's Tax>Returns
The New Yorker, 08.10.2016

Tax Analysts Quotes Mark Matthews and Scott Michel on the Future of OVDP
Tax Analysts, 08.01.2016

Scott Michel Discusses the Lack of Americans Named in Panama Papers with The American Lawyer
The American Lawyer, 07.29.2016

Caplin & Drysdale Listed in "Above the Law's" Tax Firm Power List Awards & Rankings | *Above the Law*, 07.29.2016

Scott Michel Comments on TIGTA Recent Report Criticizing OVDP
Tax Notes, 06.22.2016

Caplin & Drysdale Listed Among Top Lawyers for Tax, Bankruptcy, Estate Planning and Political Law Awards & Rankings | *Chambers USA*, 06.01.2016

Tax Notes Quotes Scott Michel on Criminal Tax Enforcement
Tax Notes, 05.10.2016

Daily Tax Report Quotes Scott Michel on Panama Papers Database
Daily Tax Report, 05.09.2016

Super Lawyers Recognizes Caplin & Drysdale Lawyers from Several Practice Areas Awards & Rankings | *Super Lawyers*, 04.26.2016

European Union News Quotes Scott Michel on Efforts to Challenge View that U.S. is a Tax Haven
European Union News, 04.11.2016

NBC Quotes Scott Michel on Panama Papers
NBC News, 04.05.2016

Scott Michel Comments on the U.S. as a Tax Haven for the Wealthy
Channel One Russian TV, 04.05.2016

WSJ Talks to Scott Michel After Two Firms Plead Guilty to Helping U.S. Clients Hide Millions in Offshore Accounts
Wall Street Journal, 03.09.2016

Scott Michel Comments on DOJ's Latest Offshore Efforts Focusing on UBS Accounts in Singapore
Tax notes, 03.07.2016

Scott Michel Comments on Attorney Confidentiality FATCA Exemption
Daily Tax Report, 03.01.2016

Financial Planning Journal Quotes Scott Michel on U.S. Becoming the World's Favorite New Tax Haven
Financial Planning Journal, 02.16.2016

Scott Michel Comments on U.S. Becoming the World's Favorite New Tax Haven
Bloomberg Businessweek, 01.27.2016

Scott Michel Comments on the Trends in IRS Criminal Enforcement
Tax Notes, 12.21.2015

Scott Michel Discusses U.S. Non-Prosecution Agreements Not Protecting Related Companies
Tax Notes, 12.14.2015

U.S. News & World Report Lists Caplin & Drysdale in "Best Law Firms" for 2016 Awards & Rankings | 11.02.2015

Scott Michel Comments on Disclosure of Singapore and Israeli Bank Information re U.S. Accountholders
Bloomberg BNA's White Collar Crime Report, 10.09.2015

Financial Times Talks to Mark Matthews on Offshore Crackdown Returns
Financial Times, 08.09.2015

Tax Notes Today Quotes Scott Michel on Enforcement Efforts Turning Toward 'Leavers'
Tax Notes Today, 08.05.2015

Worldwide Tax Daily Quotes Mark Matthews on Jonathan Pollard and the FBAR Hammer Penalty
Worldwide Tax Daily, 07.30.2015

Senators Praise DOJ Tax Division Nominee Cono Namorato
Tax Notes Today, 07.23.2015

The Daily Tax Report Quotes Cono Namorato on Nomination Hearing for DOJ Position
Daily Tax Report, 07.22.2015

Wall Street Journal Quotes Scott Michel on IRS's Probe of Singapore Firm
The Wall Street Journal, 07.19.2015

Bloomberg BNA Quotes Scott Michel on New FBAR Penalty Limits and Eighth Amendment Litigation
Tax Analysts, 06.05.2015

Tax Analysts Speaks to Scott Michel: FBAR Penalty Guidance Reflects Sensitivity to U.S. Constitutional Concerns
Tax Analysts, 06.02.2015

Clients and Peers Distinguish Caplin & Drysdale in Chambers' Rankings
Awards & Rankings | *Chambers USA*, 05.19.2015

Scott Michel Comments on Taxpayers Seeking Entry To OVDP
Bloomberg BNA, 05.12.2015

Scott Michel Comments on U.S. Caterpillar Criminal Tax Inquiry
Worldwide Tax Daily, 05.08.2015

Scott Michel Featured on Nightly Business Report's Whistleblower Series
CNBC, 05.07.2015

Scott Michel Comments on the End of Offshore Bank Secrecy
CNBC, 04.30.2015

Scott Michel Discusses Tax Crime Penalties and Remedies
The Washington Post Magazine, 04.27.2015

Super Lawyers Lists Caplin & Drysdale Lawyers
Both | *Caplin & Drysdale*, 04.23.2015

Caplin & Drysdale's White Collar Defense Practice Earns Recognition
Awards & Rankings | *Corporate LiveWire*, 04.09.2015

Scott Michel Comments on War on Tax Cheats
The Hill, 04.08.2015

Worldwide Tax Daily Quotes Mark Matthews on FATCA: Swatting Flies With Atom Bombs
Worldwide Tax Daily, 04.02.2015

Scott Michel Comments on Impact of First Swiss Bank to Settle Under U.S. Tax Program
Thomson Reuters, 03.30.2015

The Daily Tax Report Quotes Scott Michel: Swiss Bank Agrees to Pay U.S. \$211 Million to Avoid Prosecution for Aiding Tax Evasion
Daily Tax Report, 03.30.2015

WSJ Talks to Scott Michel About Tax Fraud

The Wall Street Journal, 03.13.2015

CNN Quotes Scott Michel on the Taxation of American Minors Living Abroad

CNN Money, 03.11.2015

President Obama Nominates Caplin Attorney To Head DOJ Tax Division

Law360, 02.25.2015

President Obama Announces Intent to Nominate Cono Namorato for Assistant Attorney General

Press Releases | *Caplin & Drysdale*, 02.24.2015

White House Backs Caplin & Drysdale Lawyer For DOJ Tax Post

Awards & Rankings | *Legal Times*, 02.24.2015

President Obama Announces Nominee Cono Namorato for Top Spot at DOJ Tax Division

Tax Notes, 02.24.2015

Daily Tax Report Quotes Scott Michel on the American Bar Association's OVDP Webinar

Daily Tax Report, 02.24.2015

President Obama Nominates Cono Namorato as Top Tax Prosecutor

International Tax Monitor, 02.24.2015

Scott Michel Comments on Offshore Enforcement Issues Regarding HSBC and UBS

LAW360, 02.13.2015

International Tax Monitor Quotes Scott Michel: Obama Proposal to Require FATCA Reporting to Account Holders

Bloomberg BNA, 02.03.2015

Mark Matthews Comments on International Tax and Financial Regulatory Agenda

Worldwide Tax Daily, 01.06.2015

WSJ Quotes Scott Michel on \$400 Million Bank Leumi Settlement

The Wall Street Journal, 01.02.2015

The Wall Street Journal Quotes Mark Matthews: Why Does Uncle Sam Hate American Expats?

The Wall Street Journal, 12.15.2014

Scott Michel Comments on U.S. Strengthening International Tax Enforcement Efforts

Worldwide Tax Daily, 11.07.2014

Caplin & Drysdale Receives High Rankings from 2015 U.S. News-Best Law Firms

Awards & Rankings | *U.S. News - Best Lawyers*, 11.04.2014

CNBC Quotes Scott Michel: Tax Dodgers Should Not Be Heartened by This Verdict

CNBC, 11.04.2014

On the Eve of IFA-Mumbai, Bloomberg Interviews Scott Michel and David Rosenbloom: FATCA Strengthens U.S. Tax Enforcement Hand in India

Daily Tax Report and International Tax Monitor, 10.08.2014

Scott Michel Comments on Questions Surrounding Standards of Willful Conduct Under Streamlined Version of OVDP

Daily Tax Report, 09.18.2014

Scott Michel Offers Insights on The DOJ's Swiss Bank Program and Coming Enforcement

Le Temps, 09.16.2014

CNBC Quotes Scott Michel: Tough Tax Rules See Expats Ditch Their U.S. Passports

CNBC, 09.11.2014

Caplin & Drysdale Lawyers Earn Best Lawyers Ranking

Awards & Rankings | 08.21.2014

With Its Founders, Caplin & Drysdale Celebrates 50 Years of Excellence

Press Releases | *Caplin & Drysdale*, 07.23.2014

Worldwide Tax Daily Quotes Mark Matthews: IRS Investigators to Focus on Cybercrime, Virtual Currency

Worldwide Tax Daily, 07.09.2014

Mark Matthews Comments on Landmark Tax Evasion Law

POLITICO, 07.09.2014

Wall Street Journal Quotes Scott Michel on the Hazards of Offshore-Account Disclosure

The Wall Street Journal, 06.27.2014

The Economist Quotes Mark Matthews on Campaign Against Tax Cheats

The Economist, 06.26.2014

Bloomberg BNA Quotes Scott Michel on Streamlined Penalty Structure Available to Those in OVDP

Bloomberg BNA, 06.24.2014

Worldwide Tax Daily Quotes Scott Michel on Updated OVDP

Worldwide Tax Daily, 06.23.2014

Bloomberg Quotes Scott Michel: IRS Boosts Pressure for Disclosure of Offshore Accounts

Bloomberg News, 06.19.2014

Bloomberg's International Tax Monitor Quotes Scott Michel: IRS Expands Relief for Disclosure, Tightens Rules for Neglect

International Tax Monitor, 06.18.2014

Bloomberg's International Tax Monitor Quotes Scott Michel: Time Extensions Welcome Under Non-Prosecution Program

International Tax Monitor, 06.06.2014

Daily Tax Report Quotes Scott Michel on New Offshore Disclosure Program for U.S. Taxpayers

Daily Tax Report, 06.04.2014

Caplin & Drysdale Earns Top Honors in 2014 Chambers USA

Awards & Rankings | *Chambers USA*, 05.28.2014

The Wall Street Journal Quotes Scott Michel on the DOJ Bank Program and Implications for Global Financial Community

The Wall Street Journal, 05.27.2014

Daily Tax Report Quotes Scott Michel on the Departure of DOJ Tax Division Chief Keneally
Bloomberg, 05.27.2014

Bloomberg Quotes Mark Matthews on Credit Suisse Plea Strengthening DOJ's Hand Against Swiss Banks
Bloomberg, 05.26.2014

Daily Tax Report Quotes Mark Matthews: U.S. Will Get Credit Suisse Account Names Despite Treaty Problems
Daily Tax Report, 05.21.2014

Scott Michel Comments on Credit Suisse's Guilty Plea
Swissinfo, 05.20.2014

The Wall Street Journal Quotes Scott Michel on Credit Suisse Plea
The Wall Street Journal, 05.20.2014

Swiss TV Interviews Scott Michel on Implications of Credit Suisse Plea
RTS Radio Television Suisse, 05.20.2014

Worldwide Tax Daily Quotes Scott Michel: Credit Suisse Settlement May Be Benchmark for Future Cases
Bloomberg, 05.07.2014

Scott Michel Comments on Credit Suisse Tax Deal
Bloomberg, 05.06.2014

ABC News Quotes Mark Matthews: US to Use Tax Law on Russian Banks
ABC News, 05.06.2014

Scott Michel Comments on U.S.-Israel FATCA Agreement
Daily Tax Report, 05.02.2014

The Washington Post Lists Caplin & Drysdale Attorneys Among the Top Attorneys in D.C. Awards & Rankings | *The Washington Post*, 04.30.2014

CCTV America Interviews Scott Michel on FATCA's Role in Improving Global Tax System
CCTVAmerica, 04.25.2014

The Wall Street Journal Quotes Scott Michel: New Risks for Advisers with Clients Who Own Unreported Overseas Assets
The Wall Street Journal, 04.21.2014

Tax Notes Today Quotes Scott Michel: DOJ Doesn't See Barriers to Receipt of Information Under Swiss Bank Program
Tax Notes Today, 03.19.2014

Tax Notes Today Quotes Mark Matthews: DOJ May Investigate Swiss Banks That Were Qualified Intermediaries
Tax Notes Today, 03.07.2014

Mark Matthews Discusses Credit Suisse Senate Hearing on Tax Evasion
Arise Xchange, 02.27.2014

Scott Michel Comments on the Credit Suisse Senate Hearing
Bloomberg News, 02.26.2014

Bloomberg Quotes Scott Michel and Mark Matthews: Swiss Banks Under Pressure as Deadline Nears for DOJ Program to Find U.S. Accounts

Bloomberg, 12.20.2013

POLITICO Quotes Scott Michel: Swiss Banks Urge U.S. Tax Dodgers to Come Clean to Beat Deadline

POLITICO, 12.17.2013

Washingtonian Recognizes Caplin & Drysdale Attorneys Among Washington's Best Lawyers

Awards & Rankings | *Washingtonian Magazine*, 12.03.2013

WSJ Interviews Scott Michel on U.S. Government Seeking Information from U.S. Banks

The Wall Street Journal, 11.15.2013

NYTimes Quotes Scott Michel: Bank Records Sought in Offshore Tax Inquiry

The New York Times, 11.12.2013

Scott Michel Speaks with Swiss TV Regarding John Doe Summons and ZKB

ECO, 11.11.2013

Bloomberg Quotes Scott Michel Regarding IDR Response Deadlines

Bloomberg, 11.07.2013

Worldwide Tax Daily Quotes Scott Michel: Swiss Court Orders Banks to Give Ex-Employees Copies of Data Shared With U.S.

Worldwide Tax Daily, 11.04.2013

Wall Street Journal Quotes Scott Michel: More U.S. Taxpayers Admit to Secret Swiss Accounts

The Wall Street Journal, 11.01.2013

DOJ Deal with Swiss Banks Impacts U.S. Taxpayers and Financial Firms Around the World

Press Releases | 10.31.2013

Mark Matthews Talks to Tax Notes About Creating Greater Flexibility in the Offshore Voluntary Disclosure Program

Tax Notes, 10.28.2013

19 Caplin & Drysdale Attorneys Achieve Best Lawyers in America Ranking

Awards & Rankings | *U.S. News & World Report*, 10.21.2013

Worldwide Tax Daily Quotes Scott Michel: Swiss Bank Ends Operations, Citing U.S.-Swiss Tax Dispute

Worldwide Tax Daily, 10.21.2013

Tax Notes Quotes Scott Michel: IRS Auditors Take Closer Look at 'Quiet' Disclosures of Offshore Accounts

Tax Notes, 10.18.2013

Tax Notes Today Quotes Scott Michel: Swiss Bankers Voice Concerns Over DOJ Compliance Program

Tax Notes Today, 10.11.2013

New York Times Quotes Mark Matthews: Complying with U.S. Tax Evasion Law is Vexing Foreign Banks

New York Times, 09.16.2013

CNN Money Quotes Scott Michel: Americans Turn In Passports As New Tax Law Hits

CNN Money, 09.05.2013

Reuters Quotes Scott Michel on U.S. – Swiss Bank Deal
Reuters, 09.03.2013

Mark Matthews Comments on U.S.-Swiss Program to Combat Tax Evasion
Tax Notes, 08.30.2013

Scott Michel Speaks with Bloomberg on DOJ's Tax Deal with Swiss Banks to Reveal U.S. Account Information
Bloomberg BNA's Daily Tax Report, 08.30.2013

Scott Michel Speaks with German Radio Regarding U.S.-Swiss Tax Deal
SRF Radio, 08.30.2013

Mark Matthews, Scott Michel and Cono Namorato Comment On U.S.-Swiss Tax Agreement
Thomson Reuters, International Taxes Weekly, 08.30.2013

U.S.-Swiss Tax Deal Impacts U.S. Account Holders and Dozens of Swiss Financial Institutions
Press Releases | 08.29.2013

South China Morning Post Quotes Scott Michel: Tax Evaders Feel the Heat in Havens
South China Morning Post, 08.24.2013

CCH Quotes Mark Matthews on Government's Power to Compel Records of Foreign Bank Accounts
CCH, 08.21.2013

The Wall Street Journal Quotes Scott Michel: As U.S. Expats Balk at Tax Law, Asia Sees a Shift
The Wall Street Journal, 08.12.2013

Scott Michel Talks to Tax Notes About FBAR Compliance
Tax Notes, 08.05.2013

Reuters Quotes Scott Michel: U.S., Liechtenstein Bank Reach Settlement in Tax Evasion Case
Reuters, 07.31.2013

The Wall Street Journal Quotes Scott Michel on Efforts to Identify Norwegian Tax Evaders
The Wall Street Journal, 07.30.2013

Scott Michel Speaks to Swiss Radio: Swiss Finance Minister Proposes Permits for Swiss Banks to Hand Over Data to U.S.
World Radio Switzerland, 07.04.2013

Scott Michel Speaks to Tax Notes: Swiss Court Blocks Credit Suisse From Sharing Ex-Employee's Data With U.S.
Tax Notes, 07.01.2013

The Wall Street Journal Speaks to Mark Matthews on Former Swiss Banker Hiding Own Accounts
The Wall Street Journal, 06.28.2013

Scott Michel Speaks in Kuwait City at FATCA Seminar
06.18.2013

The Wall Street Journal Quotes Scott Michel: Swiss Parliament Pushes Back on U.S. Banks Deal
The Wall Street Journal, 06.18.2013

Caplin & Drysdale Comments on ICIJ's Offshore Leaks Database
Press Releases | 06.17.2013

Bloomberg Quotes Mark Matthews on Potential Issues for New IRS Commissioner
Bloomberg's Daily Tax Report, 06.13.2013

Scott Michel Quoted Regarding U.S. Finding Jurisdiction for Foreign Bank Prosecutions
Tax Notes, 06.10.2013

Scott Michel and David Rosenbloom Quoted on Recent U.S. Efforts to Tackle Offshore Tax Evasion
Tax Notes, 06.10.2013

Scott Michel and Michael Pfeifer Selected for Legal Tax Advisory Board
06.10.2013

The Legal 500 Recommends Caplin & Drysdale As a Leading Firm For 2013
Awards & Rankings | *The Legal 500*, 06.03.2013

14 Caplin & Drysdale Attorneys Recognized in Chambers USA 2013
Awards & Rankings | *Chambers USA*, 05.29.2013

Scott Michel Comments on Actions of Swiss Government to Authorize Banks to Disclose Information
New York Times, 05.29.2013

The Wall Street Journal Quotes Scott Michel: Swiss Bow to Pressure for More Bank Data
The Wall Street Journal, 05.29.2013

Scott Michel Quoted by Tax Notes on Impact of IRS Scandal
Tax Notes, 05.17.2013

Bloomberg BNA Quotes Scott Michel Regarding Tax Evasion
Bloomberg BNA, 05.10.2013

Scott Michel and David Rosenbloom Quoted On the Impact of Offshore Tax Evasion
CardHub.com, 05.10.2013

Tax Notes Quotes Mark Matthews on the State of Voluntary Disclosures
Tax Notes, 05.06.2013

Scott Michel is Quoted on U.S. Efforts to Combat Offshore Tax Evaders
Fox Business, 05.01.2013

Scott Michel and David Rosenbloom Cited in Canadian Report on Tax Evasion
Canadian House of Commons - Report on the Standing Committee on Finance, 05.01.2013

Super Lawyers Lists Nineteen Caplin & Drysdale Attorneys
Awards & Rankings | *Super Lawyers*, 04.29.2013

Fortune Talks With Cono Namorato on Victory for Offshore Account Holders
Fortune, 04.29.2013

Scott Michel Talks to The Wall Street Journal About Hiding Offshore Accounts From Advisers
The Wall Street Journal, 04.11.2013

The Fiscal Times Quotes Charles Ruchelman on Why More Affluent Americans Pay No Taxes
The Fiscal Times, 04.11.2013

CCTV America Talks With Scott Michel About Offshore Bank Account Inquiries
CCTV America, 04.10.2013

The Wall Street Journal Quotes Scott Michel: Tax Havens Shift as Luxembourg Loosens Bank Secrecy
The Wall Street Journal, 04.10.2013

The Wall Street Journal Quotes Scott Michel: Luxembourg to Reveal Bank Data
The Wall Street Journal, 04.10.2013

Scott Michel Talks to Tax Notes, U.S. Requests Liechtenstein Data
Tax Notes, 03.26.2013

Scott Michel and David Rosenbloom Comment on Americans with Asian Bank Accounts
Bloomberg, 03.25.2013

Tax Notes Quotes Mark Matthews on IRS's Enforcement Efforts
Tax Notes, 03.21.2013

Caplin & Drysdale Attorneys Recognized by Peers in Best Lawyers in America Awards & Rankings | 03.18.2013

PODCAST: IRS Targeting Tax Havens in Singapore and Hong Kong
Accounting Today, 03.12.2013

Mark Matthews is Quoted Regarding Government's Crackdown on Non-Swiss Banks
SonntagsZeitung, 03.10.2013

WSJ Quotes Mark Matthews on Increased Scrutiny of Offshore Accounts
The Wall Street Journal, 03.06.2013

Scott Michel Quoted in The Wall Street Journal, A Dip Into Swiss Secrecy Rules
The Wall Street Journal, 02.22.2013

Mark Matthews Quoted in Tax Analysts, U.S. Appeals Court Dismisses Suit by 'Tax Cheats' Against UBS
Tax Analysts, 02.11.2013

WSJ Quotes Mark Matthews on UBS Clients' Lawsuit
02.08.2013

WSJ Quotes Scott Michel on U.S. Crackdown of Offshore Tax Evasion
01.31.2013

Mark Matthews Quoted in Tax Analysts, Saving the Fifth Amendment From an Aging Loophole
Tax Analysts, 01.23.2013

Mark E. Matthews Quoted in Tax Notes, Will U.S. Hypocrisy on Information Sharing Continue?
Tax Notes, 01.21.2013

Tax Notes Names Scott Michel Among the Top 10 in Tax Community for 2012
01.09.2013

NPR Talks to Scott Michel About Implications of Wegelin Guilty Plea
01.08.2013

Scott Michel Interviewed by Geneva's "Le Temps" Regarding Wegelin Guilty Plea
01.07.2013

Chris Rizek and Scott Michel Comment on Wegelin Guilty Plea
01.06.2013

Scott Michel and Mark Matthews Join American Citizens Abroad
12.26.2012

Mark Matthews Quoted in Tax Notes, Defense Bar Questions Government Wins on Required Records Doctrine
Tax Notes, 12.17.2012

Mark Matthews Quoted in Tax Notes, CI Officials Debate Focus on Stolen Identity Refund Fraud
Tax Notes, 12.17.2012

Scott Michel Quoted in Tax Notes, Whistleblower Referrals Leading to CI, DOJ Investigations
Tax Notes, 11.19.2012

Scott Michel Discusses Plea Agreement of former UBS banker Christos Bagios
Tax Notes, 11.12.2012

U.S. News Recognizes Caplin & Drysdale With Top Ranking
Awards & Rankings | 11.08.2012

Scott Michel Quoted in the Wall Street Journal on Expatriate Foreign Bank Accounts
Wall Street Journal, 10.19.2012

Mark Matthews Quoted in Reuters, Overseas Tax Dagnet Refocuses on Country Partnerships
Reuters, 09.18.2012

Mark Matthews Quoted in Reuters, U.S. Justice Department Speeding Arrests of Tax Refund Thieves
Reuters, 09.18.2012

Scott Michel Quoted in Epoch Times, Swiss Banks Stand to Lose Hundreds of Billions
Epoch Times, 09.17.2012

Mark Matthews Quoted in Tax Notes, For DOJ Tax Division, Consistency And Deterrence Are Key
Tax Notes, 09.10.2012

Mark Matthews Interviewed on The Kudlow Report, IRS Assault
CNBC's The Kudlow Report, 06.29.2012

Mark Matthews Quoted in The Wall Street Journal, When Can Tax Cheats Relax?
Wall Street Journal, 04.13.2012

Legal Bisnow Profiles Mark Matthews
Legal Bisnow, 04.12.2012

Scott Michel Quoted in Wall Street Journal Article, Swiss Amend U.S. Tax Treaty
Wall Street Journal, 03.06.2012

Caplin & Drysdale Taps Mark Matthews to Bolster Tax Practices in Washington, D.C.
Press Releases | 02.13.2012

Scott Michel Comments on Voluntary Disclosure Penalty Issues
Toronto Star, 01.11.2012

Scott D. Michel Comments in Tax Notes Today Article, IRS to Allow Extensions of August 31 OVDI Application
Deadline
Tax Analysts-Tax Notes Today, 01.03.2012

Scott Michel Quoted in Swiss Article, US Tax "Ultimatum" Has Swiss Banks Sweating
Swissinfo.ch, 12.21.2011

The Best Lawyers in America Ranks 19 Caplin & Drysdale Attorneys as Leaders in Their Field
Awards & Rankings | *U.S. News & World Report*, 09.01.2011

Scott Michel Comments in Reuters Article, "U.S. Senate Bill Targets Offshore Tax "Trickery"
Reuters, 07.12.2011

Scott Michel Comments in Bloomberg, IRS Loosens Aug. 31 Deadline for Offshore Tax Disclosures
Bloomberg, 06.03.2011

Scott D. Michel Comments in Tax Notes Today Article, IRS to Allow Extensions of August 31 OVDI Application
Deadline
Tax Analysts-Tax Notes Today, 06.03.2011

Wall Street Journal Interviews Scott Michel About IRS Enforcement in Asia
Wall Street Journal, 05.11.2011

Scott Michel Comments on Israeli Bank's Response Amid IRS Scrutiny of Undeclared Offshore Accounts
Reuters, 11.01.2010

Caplin & Drysdale Recognized in 2011-2012 U.S. News-Best Law Firms Ranking
U.S. News & World Report, 09.15.2010

Scott Michel Comments on U.S. Government's Investigation of Offshore Accounts
Tax Analysts, Eurasia Review, The Wall Street Journal, 08.24.2010

19 Caplin & Drysdale Attorneys Named Best Lawyers in America
Awards & Rankings | *U.S. News & World Report*, 08.04.2010

Caplin & Drysdale Attorneys Comment on the End of the Era of Bank Secrecy
Foreyard, Bloomberg, PRLog, FA Magazine, etc., 05.04.2010

Christopher Rizek Comments on Julius Baer Whistleblower
The New York Times, 01.19.2010

IRS Unveils Criteria for Swiss Bank Account Disclosures
The Washington Post, 11.17.2009

Scott Michel Comments on U.S. Targeting Hong Kong for Tax Evaders
Bloomberg, 11.12.2009

GETTING PERSONAL: Unit Should Help IRS Track Rich Tax Dodgers
The Wall Street Journal, 11.03.2009

Scott Michel Comments on the IRS Settlement Initiative and Implications after Amnesty Deadline
The New York Times, ABC News, The Wall Street Journal, Bloomberg, 10.28.2009

Something to Aim for
Dealbreaker, 09.08.2009

Informant in Tiny Nation Toppled Decades of Banking Secrecy
Sunlight Projects, 08.31.2009

U.S. Justice Dept Says No Plans to Drop UBS Case
guardian.co.uk, 06.23.2009

Super Lawyers Recognizes Nine Caplin & Drysdale Attorneys in Five Practice Areas
Awards & Rankings | *Super Lawyers*, 03.27.2009

IRS Seduces Offshore Account Holders
Press Releases | 03.26.2009

Caplin & Drysdale Member Cono Namorato Interviewed on Money Matters
Money Matters, 03.13.2009

Countries in Europe and Asia Agree to Modify Treaty Provisions: Profound Implications for Noncompliant U.S.
Taxpayers With Foreign Accounts
Press Releases | 03.13.2009

UBS Faces IRS Fight Over Names, Shrs Rise on Deal
Interactive Investor, 02.19.2009

U.S. Seeks More UBS Account Records in Tax Battle
Reuters, 02.19.2009

Corporate Crime Defense Bar in Unison: More Prosecutions Are on the Way
Corporate Crime Reporter, 02.19.2009

U.S. Government Suing UBS to Get at Names of the Rich
The Financial Post, 02.19.2009

Is Big Business Scared of Obama?
The Wall Street Journal Law Blog, 01.02.2009

EVENTS

Scott Michel Analyzes Ethical Issues with Constitutional and Common Law Privileges at ABA Criminal Tax Fraud
and Tax Controversy Institute
Las Vegas, NV, 12.13.2022

Mark Matthews Moderates Panel on IRS Criminal Enforcement Priorities at ABA Criminal Tax Fraud & Tax
Controversy Institute
10:30 AM - 11:30 AM
12.09.2021

Scott Michel Addresses Ethical Issues in International Tax at IFA Winter International Tax Conference
11:00 AM to 12:20 PM
12.09.2021

Mark Matthews Addresses New Frontiers in Tax Fraud at Berkeley Fraud Fest
06.25.2021

Cono Namorato Addresses Circular 230 on ABA Virtual 2020 May Tax Meeting
2:00 PM - 3:00 PM
07.30.2020

Scott Michel Joins Steering Committee for Cambridge Forum on International Tax Disputes
02.26.2020

Scott Michel Co-Chairs Panel on Protecting Taxpayers in an Era of Increased Regulation and Heightened Enforcement at U.S./Europe Tax Conference
2:30 PM - 4:00 PM GMT
04.04.2019

Scott Michel Leads Discussion on "Tax Avoidance v. Tax Evasion" at Cambridge Forum on International Tax Disputes
02.28.2019

Scott Michel Examines Whether Human Rights Are Affected By Tax Information Reporting and Disclosures at ABA Paris Sessions
11:00 AM - 12:30 PM
06.09.2018

Scott Michel Explores Ethical Consideration with International Clients at STEP Miami 9th Annual Summit
11:50 AM
06.01.2018

Scott Michel Serves as Section Vice Chair at 2018 ABA Section of Taxation May Meeting
05.10.2018

Scott Michel Discusses Ethics in Tax Controversy at TEI Audits & Appeals Seminar
3:15 PM to 4:30 PM
05.01.2018

Mark Matthews Examines Anti-Money Laundering at International Tax Conference
10:20 AM
03.22.2018

Mark Matthews Discusses Aggressive Tax Planning at International Tax Conference
12:30 PM
03.22.2018

Mark Matthews Analyzes Criminal Actions Against Advocates at International Tax Conference
2:30 PM
03.22.2018

Mark Matthews Explores Role of Private Practitioners and Disclosure in Tax Administration at International Tax Conference
12:15 PM to 12:30 PM
03.22.2018

Scott Michel Discusses Taking on a Criminal Tax Case at ABA White Collar Crime Conference
10:30 AM
02.28.2018

Scott Michel Moderates "Representing the Global Citizen" Panel at National Institute Tax Controversy Conference
12.08.2017

Mark Matthews Moderates IRS Criminal Investigation Roundtable at National Institute Tax Controversy Conference

12.07.2017

Scott Michel Discusses AML and Tax at Financial Crimes Enforcement Conference

4:00 PM - 5:15 PM

12.04.2017

Mark Matthews Chairs Individual Cross Border Matters Panel at 30th Annual Institute on Current Issues in International Taxation

2:45 PM to 3:45 PM

12.01.2017

Scott Michel Examines Ethical Issues in International Tax at 30th Annual Institute on Current Issues in International Taxation

10:30 AM to 11:45 AM

12.01.2017

Mark Matthews Presents at the 2017 Legal Week International Private Client Forum

11.03.2017

Scott Michel Co-Chairs 5th Annual International Tax Enforcement and Controversy Conference

10.27.2017

Mark Matthews Presents on Renewable Tax Controversy Resource at Southern Federal Tax Institute

3:30 PM to 4:30 PM

10.25.2017

Scott Michel Explores International Tax Enforcement at D.C. Bar Webinar

12:15 PM to 1:45 PM

10.11.2017

Mark Matthews Discusses Automatic Exchange of Financial Information at 71st Congress of the International Fiscal Association

08.28.2017

Scott Michel Discusses Audit and Controversy Experiences in Colombia and the U.S. at 2017 Joint IFA Meeting

08.24.2017

Scott Michel to Speak on Trends in Criminal Tax Enforcement at ABA 31st Annual National Institute on White Collar Crime

03.08.2017

Scott Michel to Speak on International Information Sharing at 2016 Forum on International Tax Disputes

11.11.2016

Scott Michel to Speak on Administration, Penalties and Tax Payer Rights at 2016 Forum on International Tax Disputes

11.10.2016

Scott Michel and Mark Allison to Speak on IRS Representation Tools, Techniques And Defensive Strategies at NYU 75th Institute on Federal Taxation

10.23.2016

Scott Michel to Speak at 2016 Joint Meeting of the USA and Italy Branches of IFA

09.23.2016

Matthew Hicks and Mark Matthews to Speak on Civil & Criminal Tax Penalties' Subcommittee at 2016 ABA May Meeting

05.07.2016

Scott Michel to Speak on Criminalization of Tax Violations at 16th Annual US-Europe Tax Planning Strategies Conference

03.17.2016

Scott Michel to Speak on Recent Expansion of Criminal Tax Enforcement at ABA 30th Annual National Institute on White Collar Crime

03.02.2016

Scott Michel to Speak at ABA Criminal Tax Fraud and Tax Controversy Conference

12.10.2015

Mark Matthews to Speak at the Annual LITC Grantee Conference

12.09.2015

Mark Matthews to Speak on U.S. Global Tax Enforcement

11.18.2015

Mark Matthews to Speak at the 2015 Legal Week International Private Client Forum

11.12.2015

Scott Michel to Speak at NYU 74th Institute on Federal Taxation Panel

10.25.2015

Scott Michel to Moderate Q&A Session with DOJ Assistant Attorney General

10.16.2015

Scott Michel to Chair International Tax Enforcement Conference

10.16.2015

Scott Michel to Speak on Fixing Common Tax Problems

10.08.2015

Scott Michel and David Rosenbloom to Host Panel on 2015 Offshore Enforcement

09.01.2015

Mark Matthews to Speak on Compliance Initiatives and Voluntary Disclosure

08.14.2015

Scott Michel to Speak at 2015 Annual Tax Section Meeting

06.19.2015

Scott Michel to Co-Chair 7th Annual Tax Controversy Forum

06.05.2015

Mark Matthews to Speak on Pro Bono & Tax Clinics Panel
05.09.2015

Mark Matthews to Speak on the Status of OVDP Programs
03.12.2015

Scott Michel to Speak on Civil and Criminal Offshore Disclosure Panel
02.24.2015

Scott Michel to Moderate Criminal Tax Fraud and Tax Controversy Panel
12.11.2014

Mark Matthews to Moderate on IRS Criminal Investigation Roundtable
12.11.2014

Mark Matthews to Speak on Key International Data Collection Programs
11.06.2014

Mark Matthews to Speak on Government Use of Data
11.06.2014

Mark Matthews to Speak on Recent Developments in International Criminal Tax
10.31.2014

Mark Matthews to Speak on Recent Developments in Compliance Initiatives
10.21.2014

Scott Michel and David Rosenbloom to Host Panel on 2014 Offshore Enforcement
10.13.2014

Mark Matthews to Speak on DOJ Procedures
09.20.2014

Scott Michel to Speak on Offshore Tax Compliance
07.10.2014

Mark Matthews to Speak at Annual Income Tax Seminar
06.26.2014

Scott Michel to Moderate Panel on U.S. Global Tax Enforcement Priorities
06.24.2014

Scott Michel to Serve as Moderator for 6th Annual Tax Controversy Forum
06.20.2014

Mark Matthews to Speak on Global Private Wealth Industry
06.18.2014

Mark Matthews to Speak on Information Exchange and Privacy
06.18.2014

Mark Matthews to Speak at 29th Annual Transcontinental Trusts Conference
06.17.2014

Scott Michel Co-Chairs ABA's International Tax Enforcement Conference
03.18.2014

Mark Matthews to Speak at 28th Annual National Institute on White Collar Crime
03.06.2014

Mark Matthews to Speak at ACAMS Conference
03.06.2014

Mark Matthews to Speak at FBA's 2014 Tax Law Conference
02.28.2014

Scott Michel and Mark Matthews to Co-Chair Concurrent Symposia at FBA Tax Law Conference
02.28.2014

Scott Michel Co-Chairs ALI CLE Program "Hot Topics for Accountants & Tax Lawyers: Tax Returns, Advice, & Examination"
12.16.2013

Mark Matthews to Speak on Criminal Tax Practice Tips and Strategies
12.13.2013

Mark Matthews to Speak at ABA Criminal Tax Fraud and Tax Controversy Conference
12.12.2013

Scott Michel to Moderate Panel at ABA Criminal Tax Fraud and Tax Controversy Conference
12.12.2013

Scott Michel to Speak at University of Texas Annual Taxation Conference
12.04.2013

Mark Matthews to Speak at the 22nd International Tax and Trust Summit
11.19.2013

Scott Michel to Speak at the 72nd Institute on Federal Taxation in San Francisco
11.17.2013

Mark Matthews to Speak on Corporate Compliance
10.24.2013

Mark Matthews to Speak at University of San Diego School of Law - Procopio International Tax Institute
10.24.2013

Mark Matthews Presents Tax Program at Southern Federal Tax Institute
10.23.2013

Scott Michel to Speak at the 72nd Institute on Federal Taxation in New York
10.20.2013

Mark Matthews to Speak at the Tax Executive Institute Monthly Luncheon
10.17.2013

Scott Michel to Speak on Developments in Offshore Tax Compliance
10.11.2013

Scott Michel to Speak at Annual Advanced ALI CLE Course
10.11.2013

Scott Michel to Speak at Swiss-American Chamber of Commerce Panel Meeting
09.26.2013

Mark Matthews to Speak at Atlanta Tax Forum
09.23.2013

Scott Michel and David Rosenbloom to Speak at IFA Copenhagen 2013
08.26.2013

Mark Matthews to Speak at Anti-Fraud & Financial Crimes Conference
07.08.2013

Scott Michel to Speak at FATCA Seminar in Kuwait City
06.17.2013

Niles Elber and Mark Matthews to Speak at 12th Annual North Carolina/South Carolina Tax Section Workshop
05.24.2013

Mark Matthews to Speak on Criminal Tax Enforcement Hot Topics
03.20.2013

Scott Michel and Mark Matthews to Speak at 37th Annual Tax Law Conference
03.01.2013

Mark Matthews to Speak at ABA Seminar
01.16.2013

Scott Michel to Speak at ABA Criminal Tax Fraud and Tax Controversy 2012 Meeting
12.07.2012

Mark E. Matthews to Speak at ABA Criminal Tax Fraud and Tax Controversy 2012 Meeting
12.06.2012

Mark Matthews to Speak at OffshoreAlert Conference on FATCA
11.26.2012

Scott Michel to Speak at NYU Institute on Federal
11.11.2012

Scott Michel to Speak at UCLA Extension 2012 Annual Tax Controversy Institute
10.17.2012

Scott Michel to Speak on Developments in Offshore Tax Compliance
08.24.2012

Scott Michel to Speak at Small Business Practitioners Tax Conference
05.03.2012

Scott Michel to Answer Tax Controversy Questions
05.03.2012

Mark Matthews to Speak at AICPA Conference on Tax Controversy and Small Business Practitioners Tax Conference
05.02.2012

Mark Matthews to Speak on Sensitive Issue Examinations
05.02.2012

Scott Michel and Christopher Rizek to Speak at the Federal Bar Association's 36th Annual Tax Law Conference
03.02.2012

Scott Michel to Moderate Panel on Foreign Assets
03.02.2012

Scott Michel to Speak on Ethical Issues in International Tax Practice
12.15.2011

Scott Michel to Speak at 70th Institute on Federal Taxation
11.15.2011

Scott Michel and Niles Elber to Speak at IRS Nationwide Tax Forum
08.30.2011

Scott Michel to Speak on Offshore Tax Enforcement
08.19.2011

Scott Michel to Chair Committee at ABA's 2011 Midyear Meeting
01.21.2011

Scott Michel to Speak on Ethical Issues in International Tax Practice
12.10.2010

Scott Michel to Moderate Panel at 2010 ABA Joint Fall Meeting
09.25.2010

Scott Michel to Chair Standards of Tax Practice Panel Discussions
09.24.2010

Scott Michel to Speak on Offshore Tax Compliance
08.20.2010

Scott Michel to Speak on Ethical Issues in Whistleblower Claims
01.22.2010

Scott Michel to Speak on Issues in Whistleblower Claims
01.22.2010

Scott Michel to Chair Tax Committee for 2010 ABA Midyear Meeting
01.22.2010

Cono Namorato to Speak on Issues Surrounding the FBAR
01.14.2010

Cono Namorato to Speak at 22nd Annual Institute on Current Issues in International Taxation
12.10.2009

Scott Michel and Cono Namorato to Speak at The 26th Annual National Institute on Criminal Tax Fraud
12.03.2009

Brave New World of Tax Enforcement: UBS, International and Corporate Criminal Tax Issues
White Collar Practice Seminar - Pennsylvania Association of Criminal Defense Lawyers
11.13.2009

Voluntary Disclosures: Still Possible After UBS?
UCLA's 25th Annual Tax Controversy Institute
10.27.2009

PUBLICATIONS

The Enduring Value of Departures in a Post-Booker World
Article | *ABA White Collar Crime Committee Newsletter*, 03.07.2022

INSIGHT: The IRS's Renewed Focus on Fraud-Implications for Tax Practitioners
Article | *Bloomberg Law*, 05.08.2020

Tax Problems Loom in the College Admissions Scandal
Tax Alert | 03.18.2019

IRS's Offshore Voluntary Disclosure Program Ending: Impact on U.S. Taxpayers
Tax Alert | 03.14.2018

Possible Tax Fallout for Student and Professional Athletes from NCAA-Related Investigations
Tax Alert | 11.09.2017

Paradise Papers: U.S. Citizens and Residents Required to Report on Offshore Assets
Tax Alert | 11.06.2017

IRS Launches Issue-Based Corporate Compliance Campaigns
Article | *International Law Office*, 02.24.2017

IRS Launches Issue Based Corporate Compliance Campaigns
Article | *Global Tax Weekly*, 02.16.2017

IRS Launches 13 Issue-Based Corporate Compliance Campaigns
Tax Alert | 02.03.2017

Voluntary Disclosure Window Closing on Bitcoin Users
Tax Alert | 12.02.2016

U.S. Tax Enforcers React to The Panama Papers
IFC Review, 09.01.2016

Is the United States Still a Tax Haven? The Government Acts on Tax Compliance and Money Laundering Risks
Article | *CCH's Journal of Tax Practice & Procedure*, 07.25.2016

IRS to Hire 700 for Civil and Criminal Tax Enforcement
International Law Office, 05.20.2016

The Panama Papers and the U.S. Response: New Risks for Financial Institutions, Clients and Advisors
Tax Alert | 05.18.2016

IRS Criminal Investigation: A National Asset Being Damaged
Article | *Tax Notes*, 03.14.2016

IRS/DOJ Summons Seeks to Break Singapore Bank Secrecy on Non-Resident's Account
Tax Alert | 03.07.2016

The Tax Planner's Tightrope: Morality and Politics Now in Play
Article | *International Law Office*, 08.14.2015

FATCA – Enforcement Win or Expatriate Generator?
Article | *IFC Review*, 07.01.2015

The Tax Planner's Tightrope: Morality and Politics Now in Play
Article | *IFC Economic Report*, 05.05.2015

Switzerland Narrows Advance Notice to Account Holders of Treaty Requests: Americans with Unreported Accounts Impacted
Tax Alert | 12.16.2014

U.S. Offshore Account Enforcement Issues
Article | *CCH's Journal of Tax Practice & Procedure*, 09.30.2014

IRS Modifies Offshore Voluntary Disclosure Program and Streamlined Filing Compliance Procedures
Tax Alert | 06.23.2014

Strategies for Current Filings of Noncompliant Taxpayers as FBAR Deadline Approaches
Article | *Practical Tax Strategies*, 05.23.2014

Here Comes FATCA...What To Expect In 2014
Article | *IFC Review Monthly e-Journal*, 04.01.2014

Here Comes FATCA...What to Expect in 2014
Article | *IFC Review*, 01.04.2014

The Justice Department and Swiss Banks: Understanding the Special Disclosure Program
Article | *Bloomberg BNA*, 09.24.2013

Here Are the Implications of Singapore's Move to FATCA Compliance
Article | *Singapore Business Review*, 07.29.2013

The Crucial Implications of FATCA for U.S. Citizens in Hong Kong
Article | *Hong Kong Business*, 07.25.2013

Summary of New York's New Political Disclosure Rules for Nonprofits
Political Law Alert | 06.21.2013

FATCA: A New Era of Financial Transparency
Article | *AICPA's Journal of Accountancy*, 01.01.2013

Virginia Is for Lovers and Fraudsters
Article | 06.03.2010

IRS Scrutinizes Payroll Practices, Challenges for Companies
Article | *Financial Executive*, 05.01.2010

Undeclared Foreign Accounts—Voluntary Disclosures and FBARs After the IRS Settlement Initiative
Article | *Journal of Tax Practice and Procedure*, 12.01.2009

D.C. Circuit Extends Supreme Court's Interpretation of 'Derivative Use' Under 'Act of Production' Immunity
Article | *Andrews Litigation Reporter: White Collar Crime*, 09.01.2006

Deferred Prosecution Agreements: Implications for Corporate Tax Departments
Article | *The Tax Executive*, 02.01.2006

Criminal Tax Investigations and Current Year Returns: New Thoughts on a Perennial Issue
Article | *White Collar Crime Reporter (v. 19, Issue 3)*, 12.01.2004

The IRS Office of Professional Responsibility
Article | *Business Crime Bulletin*, 12.01.2004

Foreign Bank Accounts - Last Chance for Taxpayers?
Article | *Caplin & Drysdale*, 07.01.2004

Corporate Tax Departments and the New Focus on Corporate Criminality
Article | *The Tax Executive*, 12.01.2003

