

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

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Program: Offshore Enforcement 2015: Recent Developments and Hot Topics

Event Sponsor: Caplin & Drysdale, Chartered

Please join us in Basel for our 6th annual discussion on recent developments in offshore enforcement as tax authorities throughout the world continue to aggressively pursue taxpayers, banks, and third parties in connection with unreported "offshore" accounts and other assets.

The past year has seen disclosure begin under the U.S. Foreign Account Tax Compliance Act (FATCA), the U.S. Justice Department's resolution of many cases against Swiss banks, and the DOJ's gathering of substantial information which will send it to other countries and enhance its ongoing pursuit not just of American account holders, but also "enablers" such as bankers, lawyers, and investment advisors globally. Meanwhile, the IRS's various disclosure programs continue, with the Service ramping up more aggressive approaches to taxpayers who fail to disclose.

Practitioners are encouraged to join us and share perspectives from their home countries in this important area of tax enforcement. We look forward to seeing you at our annual presentation and free-wheeling discussion on a topic of great interest.

Attorneys

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