

TAXATION LAW RESEARCH PROGRAMME
ASIAN INSTITUTE OF INTERNATIONAL FINANCIAL LAW
www.AIIFL.com
FACULTY OF LAW, UNIVERSITY OF HONG KONG

**The IRS and Americans With Foreign Accounts:
Looming Tax and Enforcement Issues**

H. David Rosenbloom, *James S. Eustice Visiting Professor of Taxation and Director, International Tax Program, New York University School of Law; Member, Caplin & Drysdale, Washington, DC*

Scott D. Michel, *President & Managing Partner, Caplin & Drysdale, Washington, DC*

22 March 2010, Monday, 4:00 - 6:00 pm

Room 3, LG1 Floor, Library Extension Building, University of Hong Kong

The seminar will discuss tax and reporting requirements relating to foreign accounts maintained by American taxpayers; potential civil and criminal sanctions resulting from the failure to comply with such requirements; respective roles of the IRS and Department of Justice, including their increased presence abroad; the rules and procedures for voluntary disclosure; processes available to the United States to obtain offshore information through treaties and other means; potential Congressional action in the international tax enforcement area (including Obama Administration proposed compliance measures and the Congressionally proposed Foreign Account Tax Compliance Act); and related issues including the role of foreign corporations and trusts, the involvement of professionals and enablers, estate and gift tax matters, the QI program, institutional and corporate examinations, investigations, and disclosures.

About the speakers:



H. David Rosenbloom became Director of the International Tax Program at New York University School of Law in 2002. He is a member of Caplin & Drysdale, Chartered, a law firm he rejoined in 1981 after serving as International Tax Counsel and Director, Office of International Tax Affairs, in the U.S. Treasury Department from 1978 to 1981. Prof. Rosenbloom received an undergraduate degree at Princeton University, was a Fulbright Scholar at the University of Florence in Florence, Italy, and graduated from Harvard Law School, where he was President of the Harvard Law Review. He served as assistant to Ambassador Arthur Goldberg at the U.S. Mission to the United Nations and as clerk to U.S. Supreme Court Justice Abe Fortas. A frequent speaker and author on tax subjects, Professor Rosenbloom has taught international taxation and related subjects on five continents. He has also served as a Tax Policy Advisor for the U.S. Treasury, the OECD, AID, and the World Bank in Eastern Europe, the Former Soviet Union, Senegal, Malawi, and South Africa.



Scott D. Michel is the President of Caplin & Drysdale, a firm he joined in 1981. He is an internationally recognized expert in handling voluntary disclosures, audits and investigations involving undeclared foreign bank accounts. Mr. Michel lectures in the U.S. on these topics, and has made frequent appearances in Zurich and Geneva, Switzerland, for presentations to law firms, bankers, financial advisors, and the Swiss-American Chamber of Commerce. He is a Fellow of the American College of Tax Counsel and the current Chair of the ABA Section of Taxation's Committee on Standards of Tax Practice.

Please register on-line via www.AIIFL.com or email Flora Leung at flakeung@hku.hk to reserve a place.

