

**TAXATION LAW RESEARCH PROGRAMME**  
**ASIAN INSTITUTE OF INTERNATIONAL FINANCIAL LAW**  
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**FACULTY OF LAW, UNIVERSITY OF HONG KONG**  
**&**  
**THE UNITED STATES DEPARTMENT OF JUSTICE**

## International Taxation Prosecutions

Friday, 30 April 2010, 1:00 - 2:30 pm

Room LG109, LG1 Floor, KK Leung Building, University of Hong Kong

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Key Topics will include (a) Global Tax Administration Issues; (b) the new Foreign Tax Account Compliance Act and its ramifications; (c) Deferred Prosecution Agreement; (d) John Doe Summons and (e) UBS tax prosecution. This event provides a unique opportunity for U.S. business representatives, lawyers, tax executives, accountants, and students to interact directly with senior tax prosecutors from the U.S. Department of Justice. The short panel presentation/discussion with opportunity for Q&A will include two leading US criminal tax prosecutors of the UBS tax investigation.

### Featured Speakers:

**Frank P. Cihlar** was appointed as the Tax Division's Senior Counsel for International Tax Matters for the United States Department of Justice in 2006. His accomplishments include government victories in a number of difficult cases of considerable significance, including the U.S. Supreme Court decision in *The Boeing Company v. United States*. He received the Department of Justice's John Marshall Award for Outstanding Legal Achievement in 2003, the highest award given by the Department of Justice. He received this award for a second time in 2009. He also received the Attorney General's Distinguished Service Award.

**Kevin M. Downing** is currently the Senior Trial Attorney, Office of the Assistant Attorney General, Tax Division. He has supervised more than 150 criminal investigations of U.S. Taxpayers with undeclared offshore bank accounts. As director and supervisor of the investigative team, he initiated and conducted criminal investigation of international banks that aided and abetted U.S. taxpayers commit tax evasion. His experiences include serving as the lead prosecutor on the investigation of UBS AG and KPMG. In 2009, he received the John Marshall Award, the most prestigious award issued by the Department of Justice.

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