

# Global Tax Enforcement: Compliance & Risk Mitigation

HALF DAY WORKSHOP

Date: November 29th, 2017 Time: 8:00am-2:00pm

Venue: Melia, Nassau Beach Resort



# Why You Should Attend?

Governments across the world are conducting cross-border investigations and cooperating with their international partners to identify and prosecute the tax evasion and other economic crimes that drain government coffers and destabilize voluntary compliance efforts. The targets of these investigations include not only the taxpayers, but domestic and foreign financial institutions and other entities and individuals who are believed to have facilitated the conduct. Initially viewed only as a U.S. enforcement priority, the success of these efforts has spurred multiple foreign countries into action, enacting rules, regulations, and legislation to increase transparency and prevent abusive conduct within their financial systems.

The risks to the financial services industry have never been higher as clients report their offshore accounts via voluntary disclosure programs, whistleblower claims are increasing exponentially, massive data leaks are becoming more prevalent, and governments are sharing voluminous data through automatic and specific exchanges of information under the Foreign Account Tax Compliance Act ("FATCA"), the Common Reporting Standard ("CRS"), tax treaty and tax information exchange agreement ("TIEA") requests, and mutual legal assistance treaty ("MLAT") requests, among others. With the enactment of the U.K. Criminal Finances Act, the risk is heightened for individuals and entities that fail to implement policies and procedures to prevent the

facilitation of tax evasion. As HM Revenue & Customs noted, "relevant bodies should be criminally liable where they fail to prevent those who act for [them], or on their behalf from criminally facilitating tax evasion." HMRC Guidance Notes, Criminal Finances Act.

### What You Will Learn?

This training session is appropriate for CEOs, COOs, directors, officers, senior management, compliance professionals, relationship managers, and other key employees. During this four-hour training session with industry leaders, presenters will address the following themes via presentations and using scenario-based training:

- Global tax enforcement environment beyond technical compliance with FATCA and the CRS;
- 2. Using the guidance from the U.K. Criminal Finances Act to establish a global anti-tax evasion program;
- 3. Conducting an anti-tax evasion risk assessment;
- 4. Combatting offshore tax evasion without being an expert in every country's tax laws;
- 5. How "red flags" for offshore tax evasion and money laundering may differ;
- 6. Risks associated with advice relating to moving relationships to the USA to avoid CRS reporting; and
- 7. Recommendations for compliance with an eye toward establishing defenses should a regulatory issue or investigation arise.

## The Facilitators

The speakers for this conference previously worked for U.S. tax and financial crime enforcement authorities and have a wealth of legal and consulting experience working for financial institutions and individuals. They regularly provide compliance advice relating to financial crime matters.

#### 1. Caroline Ciraolo.

U.S. lawyer and Partner with Kostelanetz & Fink (law firm), former Acting Assistant Attorney General for the U.S. Department of Justice Tax Division.

#### 2. Richard Kando,

Certified Public Accountant and Managing Director with AlixPartners (consulting firm), former Special Agent for the Internal Revenue Service – Criminal Investigation.

# 3. Jay Nanavati,

U.S. lawyer and Partner with Kostelanetz & Fink (law firm), former federal and state prosecutor, previously served as assistant chief for Department of Justice Tax Division.

# Registration Fee: \$150 (Includes lunch & workshop materials)