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A Loxley



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International Tax Evasion in the Global Information Age David S. Kerzner, David W. Chodikoff, 2016-11-21 This book provides a comprehensive analysis of the Organisation for Economic Cooperation and Development's OECD war on offshore tax evasion. The authors explain the new emerging regulatory regimes on the global exchange of information to combat offshore tax evasion and analyse why Automatic Exchange of Information AEOI is not a magic bullet solution. Chapters include coverage of the Foreign Account Tax Compliance Act FATCA AEOI and the Common Reporting Standards CRS and the unprecedented extra territorial enforcement by the United States of its tax and reporting laws including the FBAR provisions of the Bank Secrecy Act. These new legal regimes directly impact nearly all financial institutions and financial service providers in the U S U K EU Canada and each of the 132 member jurisdictions of the OECD's Global Forum as well as 8 million U S expats. In light of The Panama Papers this book offers a timely and valuable contribution on the prevalence and costs of international tax evasion for the global financial community policy makers and practitioners alike.

Fatca Handbook Ranjith Kumar, 2019-05-31 This book is based on experience of the author with over 50 FATCA implementation projects. The book provides guidelines for each of the key areas in a FATCA project: Impact Analysis, Registration, FATCA policy procedures, FATCA forms, new customer onboarding, review of pre-existing customers, reporting, withholding, compliance, management roles and responsibilities, training, awareness, IT solution design and implementation, and issues management.

The FATCA Registration Process -- A Primer on the IRS FFI Net Dean Marsan, 2013 In this report Dean Marsan examines the new foreign financial institution registration process created by the IRS and how it will fit into the larger FATCA and tax information global ecosystem. After conducting an in depth review of the registration process contemplated by the IRS for global financial institutions small and large foreign and U S Marsan concludes that the newly finalized Form 8957 Foreign Account Tax Compliance Act FATCA Registration and its electronic brethren on the newly opened FATCA portal funnel into a single registration form more than 700 pages of tax regulations and other administrative guidance hundreds of pages of newly and yet to be agreed on intergovernmental agreements from more than 80 countries and the domestic laws in each of those countries. This report includes a discussion of the FATCA online registration user guide recently released by the IRS and the correcting amendments to the FATCA final regulations released on September 10 including current registration planning under those new rules.

The New FATCA Information Reporting Requirement Under Code Sec. 6038D and the Temporary and Proposed Regulations Dean Marsan, 2012 According to one recent statement by an IRS official Americans now have 1 trillion trillion with a t in assets offshore and illegally evade 40 to 70 billion in U S taxes each year through offshore tax dodges. Another estimate put the tax gap at an estimated 100 billion in tax revenues each year as a result of offshore tax abuses primarily from the use by U S taxpayers or their controlled foreign entities of concealed and undeclared accounts. It is not surprising that the government in order to eliminate this tax gap in

the face of a large budget deficit ratcheted up its pressure on taxpayers who have structured their activities in many cases with the active help and assistance of promoters and facilitators to avoid filing FBARs and reporting their taxable income from these offshore accounts On March 18 2010 the Hiring Incentives to Restore Employment Act HIRE Act was signed into law and added an entirely new U S withholding and information reporting tax regime commonly known as FATCA The stated purpose of the new law is to clamp down on tax evasion and improve taxpayer compliance by giving the IRS new administrative tools to detect deter and discourage offshore tax abuses The Congressional sponsors joint statement for a predecessor bill said FATCA will force foreign financial institutions foreign trusts and foreign corporations to provide information about their U S account holders grantors and owners respectively This article will focus on the new reporting responsibilities under Code Sec 6038D and the temporary and proposed regulations which now impose new broad based information reporting on individuals who are U S citizens or resident aliens More specifically this article will compare the current FBAR reporting requirements to the new Form 8938 Statement of Specified Foreign Financial Assets required to be filed as part of an income tax return if certain filing thresholds are met For a tabular comparison of Form 8938 and the FBAR Form TD F 90 22 1 See Exhibit I While FBAR reporting based upon the Bank Secrecy Act has in recent years become a powerful device used by the IRS and the Department of Justice to unearth hidden offshore assets and to identify offshore tax evasion by taxpayers the new Form 8938 for reporting certain foreign financial assets under Code Sec 6038D can be expected to provide even a stronger enforcement tool to help to ferret out offshore tax evasion by Americans This article is written for several audiences The article should be of interest to tax practitioners accountants and lawyers as well as students and academics since it provides insights into FATCA s end goal to identify offshore accounts and assets held by Americans by comparing the information provided by foreign financial institutions to what is being reported by individual taxpayers to ascertain if financial account information is being omitted from taxpayers returns

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