



香港中文大學  
The Chinese University of Hong Kong

*Centre for Financial Regulation and Economic Development*

金融規管與經濟發展研究中心



FACULTY OF LAW

## **A CFRED Lecture:**

# **RECENT DEVELOPMENTS IN U.S. INTERNATIONAL TAX POLICY AND ENFORCEMENT**

**20 March 2013, Wednesday, 12:30-2:00 p.m.**

*The CUHK Graduate Law Centre, 2/F Bank of America Tower, 12 Harcourt Road, Central, Hong Kong*

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The speakers would discuss developments in U.S. international tax policy, including developments in the tax treaty area, trends in transfer pricing, and the taxation of foreign income, including issues regarding foreign tax credit versus a territoriality-based system, as well as legislative developments. The colloquium would also look into trends and developments in international tax enforcement, particularly as regards ongoing investigations of the worldwide financial community by the Justice Department and the IRS concerning Americans with money offshore, recent developments in international information gathering and the IRS Whistleblower program, and FATCA. Please join us to discuss these recent developments in tax laws.

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### *Speakers:*

**Mr. Scott D. Michel**, *President, Caplin and Drysdale*

**Mr. H. David Rosenbloom**, *Member, Caplin and Drysdale; Director of the International Tax Program at New York University School of Law*

***All are welcome!***

Please join us by registering your interest here:  
[http://nems.law.cuhk.edu.hk/online-registration/?event\\_id=359](http://nems.law.cuhk.edu.hk/online-registration/?event_id=359)  
by 19 March 2013.

## About the Speakers



### *Mr. Scott D. Michel*

Mr. Michel is internationally recognized for his extensive experience in handling matters arising from the U.S. government's recent crackdown on undeclared foreign accounts, including criminal tax investigations, sensitive civil audits and voluntary disclosures. Such matters encompass a broad range of fact patterns, such as inherited accounts, situations that raise issues of complex undisclosed corporate or foundation structures, and unfiled Treasury "FBAR" forms. He is currently representing numerous clients worldwide in audits and investigations arising from IRS and Justice Department investigations involving UBS, HSBC and other banks, as well as voluntary disclosures throughout the U.S. involving dozens of foreign financial institutions throughout the world.

#### Professional Activities

Mr. Michel has made frequent appearances throughout the U.S., and in Seoul, Singapore, Hong Kong, Vienna, Zurich and Geneva for presentations on enforcement regarding foreign accounts and the Foreign Account Tax Compliance Act to multiple law firms, bankers, and tax and financial advisors, including presentations before the National University of Singapore, the Tax Academy of Singapore, the Vienna University of Economics and Business, the Korean National Tax Service, Hong Kong University, and the Korean and the Swiss-American Chambers of Commerce. He is the co-chair of the ABA Section of Taxation's Annual Conference on International Tax Enforcement, and has also appeared at other programs held by the American Bar Association, The Tax Executives Institute (U.S. and foreign branches), The National Association of Criminal Defense Lawyers, and the Virginia, NYU, Tennessee and North Carolina Tax Institutes. He has also testified as an expert on offshore account enforcement before the Standing Committee on Finance of the Canada House of Commons.

Mr. Michel is an Adjunct Professor of Law at the University of Miami School of Law Graduate Program in Taxation. He is also a Fellow of the American College of Tax Counsel, and currently serves as a Council Director for the ABA Section of Taxation. Mr. Michel previously chaired the Tax Section's Committee on Civil and Criminal Tax Penalties and the Standards of Tax Practice Committee. He is a member of the Professional Tax Advisory Council for American Citizens Abroad, a non-profit, non-partisan volunteer association whose mission includes acting as a voice for Americans living overseas.

He is also a co-founder and Director of Buildable Hours, Inc., a Washington, D.C. non-profit group that coordinates contributions and volunteer activities between law firms nationwide and local Habitat for Humanity organizations.



### *Mr. H. David Rosenbloom*

Mr. Rosenbloom has served as a Tax Policy Advisor for the US Treasury, the OECD, US AID, the International Monetary Fund, and the World Bank in Eastern Europe and the Baltic countries, the former Soviet Union, Senegal, Malawi, and South Africa. He has consulted with and advised foreign governments and international organizations on international tax matters, and served as an expert witness in international tax disputes in the United States, Canada, and New Zealand.

He has also written extensively on international and comparative tax topics. His most recent writings discuss the Foreign Account Tax Compliance Act, foreign tax credit generator transactions, and the saving clause in the U.S. tax treaties.

Mr. Rosenbloom is a James S. Eustice Visiting Professor of Taxation and the Director of the International Tax Program at New York University School of Law. He is a Lecturer on international taxation at Harvard, Stanford, the University of Pennsylvania, and Columbia Law schools, and at universities in Sydney, Vienna, Melbourne, Milan, Bergamo, Bologna, Mexico City, Mainz and Heidelberg, and Rio de Janeiro. He also Instructed at the University of Pretoria, the Università del Piemonte Orientale in Italy, the Max Planck Institut in Munich, Seoul National University, Leiden University, the Public Finance Training Center in Taipei, and the OECD Multilateral Training Centres for Tax Offices from CIS and Eastern European Countries in Vienna, Ankara, and Budapest.