

OFFSHORE COMPLIANCE INITIATIVE

One of the Tax Division's top litigation priorities is combatting the serious problem of non-compliance with our tax laws by U.S. taxpayers using secret offshore bank accounts. Increased technical sophistication of financial instruments and the widespread use of the internet have made it easy to move money around the world. According to a [2008 Senate report](#), the use of secret offshore accounts to evade U.S. taxes costs the Treasury at least \$100 billion annually.

In recent years, the Tax Division, working closely with United States Attorneys' offices, has seen groundbreaking success in addressing the use of foreign financial accounts to evade United States taxes and reporting requirements. The division's current offshore program began in 2008, with the investigation of UBS AG, Switzerland's largest bank. As a result of that investigation, in February 2009, UBS entered into a [deferred prosecution agreement](#) (DPA) and admitted guilt on charges of conspiring to defraud the United States by impeding the IRS, exited the business of providing banking services to U.S. customers with undeclared accounts, and paid \$780 million in fines, penalties, interest, and restitution. As part of the DPA and a [2009 agreement negotiated among the US, UBS, and the Swiss government](#) to settle a civil summons enforcement proceeding brought by the Tax Division, the IRS has received account information about thousands of the most significant tax cheats among the U.S. taxpayers who maintain secret Swiss bank accounts.

In January 2013, the U.S. Attorney's Office in the Southern District of New York secured the [guilty plea](#) of Wegelin Bank, the oldest private bank in Switzerland and the first foreign bank to plead guilty to felony tax charges. The bank admitted to conspiring to defraud the United States by helping U.S. account holders hide assets from the IRS in undeclared accounts. A federal district court has also authorized the IRS to issue a ["John Doe" summons](#) that will allow the United States to determine the identity of U.S. taxpayers who may hold accounts at Wegelin and other banks based in Switzerland to evade federal income taxes.

The Tax Division has opened investigations into numerous additional offshore banks located in Switzerland, India, Israel and elsewhere. From 2008 through April 2013, the Tax Division has charged over 30 banking professionals and 60 account holders, thus far resulting in five convictions after trial and 55 guilty pleas, including 2 trial convictions and 16 guilty pleas in the first four months of 2013 alone.

These investigations are expanding into other countries. In April 2013, a federal district court authorized the IRS to issue a ["John Doe" summons](#) seeking information about U.S. taxpayers who may hold undeclared offshore accounts at CIBC FirstCaribbean International Bank (FCIB), a Barbados-based bank with branches across the Caribbean. The summons, issued to Wells Fargo N.A., seeks records of U.S. taxpayers and financial institutions that used FCIB's United States correspondent account at Wells Fargo to evade taxes.

As the Division's investigations focus on an ever-widening circle of banks and others who would assist U.S. taxpayers in attempting to hide income and assets from the United States, those who would use secret offshore bank accounts are running out of places to hide. The Tax Division is committed to using every tool available in its efforts to identify, investigate, and prosecute these wrongdoers. For example, a growing number of district and circuit courts are upholding subpoenas to accountholders for foreign financial records over Fifth Amendment objections, based on the requirements under Title 31 that such records be maintained. Prosecutors have also made effective use of subpoenas on U.S.-based correspondent accounts of foreign banks to obtain vital evidence in tax prosecutions.

An essential part of the Tax Division's mission is to encourage voluntary compliance with the tax laws. In addition to the specific deterrence that results from the Division's enforcement efforts in connection with unreported foreign financial accounts, these prosecutions have triggered remarkable general deterrence. The publicity surrounding the Tax Division's enforcement efforts, operating alongside the Internal Revenue Service's Offshore Voluntary Disclosure Initiatives, have resulted in an unprecedented number of taxpayers - over 38,000 since 2009 - voluntarily disclosing to the IRS their previously hidden foreign accounts and agreeing to pay billions of dollars in back taxes, interest and penalties to the U.S. Treasury. As a result, these enforcement efforts not only remedy past wrongdoing, but also bring into the system tax revenue from taxpayers who become compliant going forward.

Offshore Compliance Initiative News
Indictments, Pleas, Sentencings, and
Other Developments

July 16, 2015

[Justice Department Announces Three Banks Reach Resolutions under Swiss Bank Program](#)

July 9, 2015

[Justice Department Announces Two Banks Reach Resolutions under Swiss Bank Program](#)

July 2, 2015

[Swiss Bank Reaches Resolution under Justice Department's Swiss Bank Program](#)

June 26, 2015

[Swiss Bank Reaches Resolution under Justice Department's Swiss Bank Program](#)

June 19, 2015

[Two More Banks Reach Resolutions Under Justice Department's Swiss Bank Program](#)

June 9, 2015

[Two More Banks Reach Resolutions under Justice Department's Swiss Bank Program](#)

June 3, 2015

[Two More Banks Reach Resolutions Under Justice Department's Swiss Bank Program](#)

May 28, 2015

[Four Banks Reach Resolutions Under Department of Justice Swiss Bank Program](#)

May 15, 2015

[Finter Bank Zurich AG Reaches Resolution under Department of Justice Swiss Bank Program](#)

May 8, 2015

[Vadian Bank AG Reaches Resolution Under Department of Justice Swiss Bank Program](#)

March 31, 2015

[Swiss Asset Manager Pleads Guilty in Federal Court to Conspiring with U.S. Taxpayers to Evade Federal Income Taxes and File False Tax Returns](#)

March 30, 2015

[Acting Assistant Attorney General Caroline D. Ciruolo Delivers Remarks at Pen and Pad Announcing First Resolution in Swiss Bank Program](#)

March 30, 2015

[Acting Associate Attorney General Stuart F. Delery Delivers Remarks at Pen and Pad Announcing First Resolution in Swiss Bank Program](#)

March 30, 2015

[BSI SA of Lugano, Switzerland, is First Bank to Reach Resolution Under Justice Department's Swiss Bank Program](#)

February 18, 2015

[New York Man Residing in the Hamptons Pleads Guilty to Obstructing Internal Revenue Service for Concealing Swiss Bank Accounts](#)

February 2, 2015

[California Doctor Pleads Guilty to Failing to Report Foreign Account at Bank Leumi in Luxembourg](#)

December 22, 2014

[Tax Return Preparers Convicted of Assisting Wealthy Clients Hide Millions in Secret Offshore Accounts at Israeli Banks](#)

December 22, 2014

[Bank Leumi Admits to Assisting U.S. Taxpayers in Hiding Assets in Offshore Bank Accounts](#)

November 21, 2014

[Credit Suisse Sentenced for Conspiracy to Help U.S. Taxpayers Hide Offshore Accounts from Internal Revenue Service](#)

November 18, 2014

[Manhattan U.S. Attorney Announces Charges Against Kentucky Resident for Maintaining Secret Swiss Bank Accounts](#)

October 20, 2014

[New Hampshire Man Pleads Guilty to Filing False Tax Return](#)

October 3, 2014

[Caribbean-Based Investment Advisor and Attorney Sentenced for Using Offshore Accounts to Launder and Conceal Funds](#)

September 5, 2014

[Caribbean-Based Investment Advisor Sentenced for Using Offshore Accounts to Launder and Conceal Funds](#)

July 11, 2014

[Caribbean-Based Investment Advisors and Attorney Plead Guilty to Using Offshore Accounts to Launder and Conceal Funds](#)

June 5, 2014

[June 5, 2014 Comments about the Program for Non-Prosecution Agreements or Non-Target Letters for Swiss Banks](#)

May 28, 2014

[Jury Finds Miami Man Owes Civil Penalties for Failing to Report Swiss Bank Account](#)

May 28, 2014

[Connecticut Man Who Used Offshore Accounts Sentenced to Prison for Tax Evasion and Conspiracy](#)

May 23, 2014

[Alaska Plastic Surgeon Indicted on Tax Evasion Charges for Concealing Bank Accounts in Panama and Costa Rica](#)

May 19, 2014

[Remarks as Prepared for Delivery by Assistant Attorney General for the Tax Division Kathryn Keneally Announcing Guilty Plea in Credit Suisse Offshore Tax Evasion Case](#)

visited on 7/20/2015

May 19, 2014

Remarks as Prepared for Delivery by Deputy Attorney General James M. Cole Announcing Guilty Plea in Credit Suisse Offshore Tax Evasion Case

May 19, 2014

Remarks as Prepared for Delivery by Attorney General Eric Holder Announcing Guilty Plea in Credit Suisse Offshore Tax Evasion Case

May 19, 2014

Credit Suisse Pleads Guilty to Conspiracy to Aid and Assist U.S. Taxpayers in Filing False Returns

May 9, 2014

Florida Doctor Sentenced for Federal Tax Crimes

May 7, 2014

Wyoming Businessman Sentenced to Prison for Using Concealed Caribbean Bank Account in Tax Evasion Scheme

April 30, 2014

California Banker Charged with Helping U.S. Taxpayers Conceal Secret Israeli Bank Accounts

April 30, 2014

Swiss Offshore Tax Evasion Enabler Pleads Guilty

March 24, 2014

U.S. and Canadian Citizens Charged with Using Offshore Accounts and Foreign Nominee Entities to Launder \$200,000

March 21, 2014

Former President of Russian Steel Producer's US Subsidiary Indicted for Hiding Assets in Secret Swiss Bank Accounts

March 18, 2014

California Attorney Sentenced to Prison in Scheme to Hide Millions in Secret Swiss Accounts at UBS AG and PICTET & CIE

March 12, 2014

Swiss Banker Pleads Guilty to Conspiring with U.S. Tax Evaders, Other Swiss Bankers and Bank Management

February 27, 2014

Portola Valley, Calif., Man Sentenced to Prison for Failure to Report Foreign Bank Accounts Held at UBS

January 13, 2014

Court Rejects Banking Associations' Challenge to Regulations Addressing Offshore Tax Avoidance

December 12, 2013

First Deadline Approaches for Participation in the Program for Non-Prosecution Agreements or Non-Target Letters for Swiss Banks

November 12, 2013

Court Authorizes IRS to Issue Summonses for Records Relating to U.S. Taxpayers with Offshore Bank Accounts

November 5, 2013

Comments on Program for Non-Prosecution Agreements or Non-Target Letters for Swiss Banks

November 4, 2013

Los Angeles Businessman Pleads Guilty to Conspiring to Defraud the United States by Concealing Israeli Bank Accounts

visited on 7/20/2015

October 18, 2013

[Additional Charges Brought Against Tax Preparers Previously Charged with Helping Clients Hide Millions in Offshore Israeli Banks](#)

August 29, 2013

[California Businessman Pleads Guilty to Conspiracy to Conceal Israeli Bank Accounts](#)

August 29, 2013

[United States and Switzerland Issue Joint Statement Regarding Tax Evasion Investigations](#)

July 17, 2013

[California Businessman Pleads Guilty to Concealing Foreign Bank Account at Israeli Bank on His Tax Return](#)

July 1, 2013

[Maryland Businessman Pleads Guilty to Concealing Foreign Bank Account at Israel-Based Bank on His Tax Return](#)

June 28, 2013

[Former Swiss Banker Pleads Guilty to Failure to Report Foreign Bank Account](#)

June 13, 2013

[Wyoming Couple Indicted for Tax Evasion](#)

April 30, 2013

[Court Authorizes Service of John Doe Summons Seeking the Identities of U.S. Taxpayers with Offshore Accounts at CIBC FirstCaribbean International Bank](#)

April 12, 2013

[California Businesswoman Agrees to Plead Guilty to Conspiracy to Conceal Israeli Bank Accounts](#)

April 12, 2013

[Arizona Businessmen and California Attorney Convicted for Hiding Millions in Secret Foreign Bank Accounts at UBS AG and Pictet & CIE](#)

March 4, 2013

[Swiss Bank Sentenced in Manhattan Federal Court for Conspiring to Evade Taxes](#)

February 27, 2013

[Middlesex County, N.J. Man Admits Tax Evasion and Concealing \\$1.2M in Income in Undeclared Indian Bank Accounts](#)

January 30, 2013

[California Man Pleads Guilty to Failure to Report Foreign Bank Accounts at UBS](#)

January 8, 2013

[South Florida Woman Pleads Guilty to Failing to Disclose Income from Swiss Bank Accounts and Agrees to \\$21 Million Penalty](#)

January 7, 2013

[Somerset County, N.J., Man Pleads Guilty to Concealing Income from Undeclared Swiss And Indian Bank Accounts](#)

January 3, 2013

[Swiss Bank Pleads Guilty in New York City Federal Court to Conspiracy to Evade Taxes](#)

July 30, 2012

[California UBS Clients Sentenced to Prison for Hiding Assets in Secret Bank Accounts Around the World](#)

June 15, 2012

[Three Tax Return Preparers Charged with Helping Clients Evade Taxes by Hiding Millions in Secret Accounts at Two Israeli Banks](#)

May 30, 2012

[South Florida Retired Businessman Pleads Guilty to Failing to Disclose Assets Held in Swiss Banks](#)

February 2, 2012

[Swiss Bank Indicted on U.S. Tax Charges](#)

January 30, 2012

[UBS Clients and Tax Attorney Indicted in Phoenix for Hiding Assets in Secret Foreign Bank Accounts](#)

January 3, 2012

[Manhattan U.S. Attorney Charges Three Swiss Bankers with Conspiring to Hide More Than \\$1.2 Billion in U.S. Taxpayer Accounts from the IRS](#)

December 7, 2011

[Client of UBS and Swiss Cantonal Bank Indicted for Conspiracy to Defraud the IRS](#)

November 17, 2011

[HSBC India Client Indicted for Tax Evasion and Failing to Report Foreign Bank Accounts](#)

August 3, 2011

[UBS Client Pleads Guilty to Filing False Tax Return](#)

August 2, 2011

[Former UBS Banker Charged with Helping U.S. Taxpayers Use Secret Swiss Bank Accounts to Evade U.S. Taxes](#)

July 21, 2011

[Swiss International Bank's Former Head of North America Offshore Banking, Others Charged with Conspiracy](#)

July 21, 2011

[Swiss Financial Advisor Indicted for Conspiring with More Than 60 U.S. Taxpayers to Hide More Than \\$184 Million in Swiss Bank Accounts](#)

June 28, 2011

[HSBC India Client Indicted for Filing False Tax Returns and Failing to Report Foreign Bank Account](#)

June 20, 2011

[California UBS Clients Plead Guilty to Hiding Assets in Secret Swiss Bank Account](#)

May 24, 2011

[New Jersey UBS Client Sentenced for Failing to Report More Than \\$1 Million in Swiss Bank Account](#)

May 23, 2011

[New Jersey UBS Client Sentenced for Failing to Report More Than \\$750,000 in Swiss Bank Account](#)

May 19, 2011

[Bank Director Charged with Hiding Foreign Assets](#)

April 13, 2011

[New York Woman Pleads Guilty to Filing a False Tax Return; Did Not Report Her HSBC India Bank Account Held \\$8.3 Million](#)

April 11, 2011

[New Jersey Businessman Pleads Guilty to Conspiring to Conceal Offshore Bank Accounts from the IRS](#)

April 7, 2011

[Justice Department Asks Court to Allow IRS to Seek HSBC India Bank Account Records](#)

March 14, 2011

[UBS Client Sentenced in San Diego for Hiding Assets in Secret Bahamian and Swiss Bank Accounts](#)

March 8, 2011

[Former Ohio Man Pleads Guilty to Failing to Report His Foreign Bank Account at UBS in Switzerland](#)

March 4, 2011

[Former UBS Client Sentenced for Hiding Millions in Offshore Bank Accounts](#)

February 23, 2011

[Four Swiss Bankers Charged with Helping U.S. Taxpayers Use Secret Accounts at Swiss Banks to Evade U.S. Taxes](#)

February 4, 2011 - S.D. Florida

[Miami Beach Hotel Developers Sentenced for Tax Fraud](#)

December 22, 2010

[Former UBS Banker Pleads Guilty to Helping American Client Conceal Assets Offshore](#)

November 19, 2010

[California UBS Client Indicted for Hiding Assets in Secret Swiss Bank Accounts](#)

November 18, 2010

[California UBS Client Charged with Hiding Assets in Secret Swiss Bank Account](#)

July 15, 2010

[Swiss Lawyer Indicted for Helping to Hide Swiss Bank Accounts and Monies Returned to U.S. Clients](#)

May 26, 2010

[Miami Beach Hotel Developers Indicted and Charged with Tax Fraud](#)

April 23, 2010

[Former UBS Client Sentenced for Hiding \\$10 Million in Offshore Bank Accounts](#)

April 15, 2010

[Miami Beach Hotel Developers Charged with Conspiring to Defraud United States](#)

April 15, 2010

[Seven UBS Clients Charged with Hiding Over \\$100 Million in Secret Swiss Bank Accounts to Defraud the IRS](#)

April 13, 2010

[Former UBS Client Pleads Guilty to Hiding Assets in Secret Offshore Bank Accounts](#)

April 12, 2010

[UBS Client Pleads Guilty to Failing to Report Over \\$1 Million in Swiss Bank Accounts](#)

February 16, 2010

[Virginia Doctor Pleads Guilty to Conspiracy Involving Undeclared Swiss Bank Account](#)

February 4, 2010

[Former UBS Client Pleads Guilty to Hiding \\$10 Million in Offshore Bank Accounts](#)

November 17, 2009

[Justice Department & IRS Announce Results of UBS Settlement & Unprecedented Response in Voluntary Tax Disclosure Program](#)

October 5, 2009

[Seattle Area UBS Client Pleads Guilty to Filing a False Tax Return](#)

September 25, 2009

[UBS Client Pleads Guilty to Failing to Report \\$6.1 Million in Swiss Bank Accounts](#)

August 21, 2009

[Former UBS Banker Sentenced to 40 Months for Aiding Billionaire American Evade Taxes](#)

August 20, 2009

[Swiss Banking Executive and Swiss Lawyer Charged with Conspiring to Defraud the United States](#)

August 19, 2009

[Remarks by IRS Commissioner Doug Shulman on UBS](#)

August 19, 2009

[U.S. Discloses Terms of Agreement with Swiss Government Regarding UBS](#)

July 28, 2009

[UBS Client Pleads Guilty to Filing False Tax Return, Hid \\$8 Million in Secret Swiss Bank Accounts](#)

June 25, 2009

[UBS Client Pleads Guilty to Filing False Tax Return](#)

April 15, 2009

[Department of Justice Asks Court to Serve Summons for Offshore Records](#)

April 14, 2009

[UBS Client Pleads Guilty to Filing False Tax Return Hid Assets Worth \\$3 Million in Secret Swiss Bank Account](#)

April 2, 2009

[UBS Client Charged with Filing False Tax Return](#)

March 4, 2009

[Statement of John DiCicco, Acting Assistant Attorney General for the Tax Division, before the Permanent Subcommittee on Investigations, Committee on Homeland Security and Government Affairs of the U.S. Senate at the hearing entitled "Tax Haven Banks and U.S. Tax Compliance - Obtaining the Names of U.S. Clients with Swiss Accounts."](#)

February 19, 2009

[United States Asks Court to Enforce Summons for UBS Swiss Bank Account Records](#)

February 18, 2009

[UBS Enters into Deferred Prosecution Agreement](#)

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