

FOREIGN BANK ACCOUNTS - JUNE 2014

A recent US District Court case was decided in favor of the IRS and imposed foreign account reporting obligations on a taxpayer that opened an account with an online poker company. The online account was a foreign account because the online poker company was a foreign company, and the account's location was determined by the location of the institution.

The ruling illustrates the expansive view the government takes in relation to a taxpayer's obligation to disclose the existence of a foreign account under the Foreign Bank and Financial Accounts Report (FBAR) rules. If you have questions about your FBAR obligations, please contact David Guarino or Cory Bilodeau, the Co-Chairs of the Tax Practice at Fletcher Tilton.



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