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Kevin F. Sweeney Joins Philadelphia Office of Chamberlain Hrdlicka

Former federal tax prosecutor brings deep knowledge of high-stakes IRS audits, tax litigation, white-collar criminal defense, and banking matters

PHILADELPHIA (September 2016) – Chamberlain Hrdlicka, one of the nation's most profitable mid-size law firms, is pleased to welcome former federal tax prosecutor Kevin F. Sweeney to its Philadelphia office.

Sweeney comes to Chamberlain Hrdlicka from the U.S. Department of Justice, Tax Division (DOJ Tax), where he led many of its most successful tax cases, including offshore banking cases against prominent Swiss banks BSI SA, Union Bancaire Privée (UBP) SA, and Edmond de Rothschild SA. During his tenure, he investigated and litigated dozens of federal white-collar criminal cases including tax evasion, tax preparer, employment tax, FBAR, money laundering, currency structuring, Foreign Corrupt Practices Act (FCPA), and other financial fraud matters.

Many of Sweeney's cases at DOJ Tax began as sensitive IRS audits into civil tax matters, such as the reporting of undeclared foreign bank accounts, captive insurance deductions, employment tax obligations, mark-to-market elections, like-kind exchanges, and tax shelters. For his work, Sweeney was awarded the U.S. Department of Justice's Tax Division Outstanding Attorney Award in 2013 and again in 2015.

Sweeney also led several cases pursuant to the DOJ Tax Program for Non-Prosecution Agreements or Non-Target Letters for Swiss Banks (commonly referred to as the Swiss Bank Program or SBP). In this capacity, he investigated banks and bank employees for violations of international tax and money laundering laws to include deficiencies in bank internal controls, FATCA compliance, and AML procedures. Additionally, Sweeney led investigations and criminal prosecutions into undeclared U.S. foreign bank account holders and facilitators such as bankers, attorneys, and asset managers.

"Chamberlain Hrdlicka has a long and distinguished track record of defending sensitive civil and criminal tax matters, and we know that Kevin will be a great asset to our team and clients," said Philadelphia shareholder Philip Karter, a former DOJ tax litigator himself. "Kevin's unique knowledge of offshore banking matters enables him to expertly guide financial institutions, executives, and professionals through U.S. regulatory and enforcement issues, and to defend U.S. citizens and residents with foreign bank accounts in criminal tax investigations, sensitive IRS audits, voluntary disclosures, streamline filings, and IRS tax compliance matters."

Kevin F. Sweeney Joins Philadelphia Office of Chamberlain Hrdlicka, *Continued*

At Chamberlain Hrdlicka, Sweeney puts his experience and longstanding connections to use representing individuals and corporate clients in IRS audits and criminal investigations, civil tax litigation before the United States Tax Court, District Courts, and Court of Federal Claims, and white-collar criminal defense litigation in United States District Court. He holds a bachelor's degree in accounting from Loyola University Maryland and a law degree from New York Law School.

