Citigroup: a culture and history of tax evasion
By Lucy Komisar

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This report describes and details a history of tax evasion by the world's largest financial conglomerate, Citigroup. Going back decades, it is a story of Citigroup's repeated, aggressive tax evasion for itself and clients, depriving governments and therefore citizens of huge amounts of funds and carried out with relative impunity.

The Tax Justice Network nominates Citigroup for the Public Eye on Davos Award for *excelling in socially irresponsible behavior by engaging in tax evasion and facilitating tax evasion by its clients*. By its actions, Citigroup has violated both international money-laundering rules and the highest standards of corporate social responsibility and ethics.

Tax evasion by corporations and the very rich impoverishes people of all countries, increases the gaping divide between the rich and the poor, and shifts the tax bill to the middle class and small businesses who don't and can't avail themselves of mechanisms created for hiding and laundering income and profits. The capital flight that is a function of tax evasion beggars the economies of developing countries, transferring the wealth of the poor to the industrial world.

Citigroup, of course, is not the only financial organization that is complicit in offshore tax evasion. It is unfortunately standard procedure for global institutions. But Citigroup was perhaps the first to use the system, it is the biggest financial services conglomerate in the world, it has repeatedly broken promises to stop its errant ways, and as will be shown in the cases that follow, it appears immune to punishment for its acts.

This report starts in the 1960s and takes the story to the present, with a look at Citigroup's subsidiaries in the tax haven of Jersey, in the Channel Islands. That offshore network raises questions about Citigroup's practices today.

The Offshore system

Citigroup officials have acknowledged that they use the offshore system to help clients avoid taxes. The use of "avoid" rather than "evade" is a legal nicety which occurs when the wealthy and powerful use their power to legalize nonpayment of taxes and hobble enforcement agencies to prevent justified investigation and prosecution. However, the cases here show that what Citigroup officials like to call "avoidance" is more likely "evasion" that hasn't been prosecuted.

In a letter to the U.S. Senate Permanent Investigations Subcommittee looking into an offshore operation run by an Argentine citizen, Citibank's counsel Jane Sherburne, of the law firm Wilmer, Cutler & Pickering and a former legal advisor to President Bill Clinton, wrote in September 2000, responding to the Senate staff view that a test of legitimacy of the offshore bank might be whether it could print and mail statements, said: "The need to print and mail statements will depend on the customer base of the off-shore and the nature of the business, and may defeat <u>the purposes of offshore banking--confidentiality and tax planning.</u>" She said, "Mailing statements for activity in the private bank account of a customer, for example, <u>risks breaches in the confidentiality as well as triggering a taxable event</u>. Private bank customers often do not receive regular statements but rather rely on the personal relationship with the private banker for information about the status of their account."

The printing of an account statement will trigger a taxable event?

U.S. Senator Carl Levin declared at a Senate hearing: "Now, I am really surprised by that sentence, that mailing a statement would trigger a taxable event." He asked Jorge A. Bermudez, Executive Vice President and Head of e-Business for Citibank: "How does the presence or absence of a bank statement trigger a taxable event? Don't you owe the tax even though you conceal it?"

Bermudez replied: "I think that would depend on where the source of the revenue, the income was coming from for that particular investment and the tax laws of a given country."

Senator Levin: "So that you might not owe the tax, and having a statement about an account might subject you to a tax you don't owe?" He said, "It is the opposite of what your counsel says. Your counsel writes this Subcommittee that the statement may trigger a taxable event."

What Sherburne meant, of course, was that Citigroup's clients don't want to take the chance of documents falling into the hands of tax authorities and revealing that they are cheating on taxes.

The beginnings in the 1960s

In 1961, Citibank became the first important user of the Eurodollar negotiable certificate of deposit. Their use would evade U.S. taxes, reserve requirements and other regulations on bank lending established by the U.S. government. In 1969 Citibank opened a Channel Islands branch to take advantage of the low maximum tax rate. "... Citibank 'made enormous amounts of money' in the Channel Islands, [former Citibanker Gerard] Finneran said, by exploiting its status as a tax haven, and the branch became a mecca for European entertainment and sports personalities seeking relief from the heavy tax burdens in their own home countries." ("Wriston" by Phillip Zweig, p263)

In other words, Citibank helped rich Europeans evade taxes.

In the decades that followed, Citigroup's tax evasion system expanded.

The Nassau Parking Scandal of 1975-1980: laundering profits

Between 1973 and 1980 Citibank shifted about $58 million in profits from high-tax to low or no-tax jurisdictions mostly through phony foreign exchange trades. The operation was known as "parking."

Exchange law controls aimed at preventing excessive "shorting" of currencies. To short a stock or a currency is to sell it when you don't have it. If you think the Swiss franc, for example, is going down you will sell it. You don't have to have it to sell it. You can keep a short position for years and years. "Long" means you buy it if you think the price is going up, and then you possess it.

The Swiss government (and others) believed that people who shorted the franc (or other currencies) would drive down its price. Therefore, Switzerland (and other countries such as Germany and France) established limits. The Swiss law said, "A bank in our country may not have a short position in Swiss francs over a limit related to the bank's capital." Citibank could not have an overnight short position of, hypothetically, 2 million Swiss francs.

If a Citibank Zurich foreign exchange trader believed the Swiss franc was going down, he would sell as much as he could. But once he got over the exchange control limit of, theoretically, 2 million Swiss francs, his books would show he was short 4 million Swiss francs. If an inspector came in, he would say, "You're over the limit." To avoid that, he "sold" the francs to Nassau. In fact, he controlled the "position," since there was nobody handling foreign exchange in Nassau. He just put it on Nassau's books.

The other use of parking was to launder profits in a tax haven. On any particular day, if there was a range of prices, a Zurich Citibank trader would do two offsetting trades where in Zurich he lost money and the Nassau branch made a profit. The paperwork made it seem as if Citibank subsidiaries in the U.S. and Europe were losing money and no-tax Bahamas was making all the profits.

Citibank management knew it was breaking the law, laundering its profits. A Citibank internal auditor later testified to the U.S. Securities and Exchange Commission (SEC): "<u>It is very simple to do real transactions just for the purpose of transferring profits…</u>They can be done at realistic rates by selecting quotes at different times during the day, making them almost impossible for an outsider to discover."

David Edwards, a whistleblower

In February 1978, a young Citibank Paris foreign exchange trader, David Edwards, wrote to Citibank's Policy and Audit Committee and outside auditors that European Citibank branches were illegally transferring profits to Nassau through foreign exchange transactions. He had made similar allegations to Citibank's Comptroller's Division a year earlier and was told there was no evidence. In March he went to the SEC. Thomas Theobold, who had just become head of Citibank's International Banking Group, soon fired him, informing him that his allegations were “not in the best interest of the institution.”

The story is told in the investigation report written by then SEC attorney Thomson von Stein. His report said that from at least 1973 to 1980, Citibank branches in Europe and Asia engaged in sham transactions through the Nassau Desk, booking foreign exchange and money market activities which were recorded for legal, i.e., tax purposes, on the Bahamas branch books, allowing initiating branches to evade local taxes, as well as local exchange control laws and reserve requirements.

It said that thousands of transactions were structured as arms length foreign exchange purchases or sales or as loans. Many were effected at artificial, i.e., off-market, prices. Often the real prices were not listed in the books. Trades were hidden in numerous small transactions, code works, or phone orders with no records.

Later, to minimize mention of Citibank Bahamas on the books of Citibank branches in Europe, the trades were made with New York, where they were inputted in a computer which automatically wrote the entries on a computer in the Bahamas.

Profits did not appear on the legal books prepared for the branches in the initiating countries, such as Germany or Switzerland. The branches were, however, secretly credited with the profits they had put on Nassau’s books.

The scam was approved at the very top

“The practices and procedures of such parking were done pursuant to policies laid down by senior management in New York,” said the SEC report. “The facts show clearly that all levels of management (except the outside Board members) knew of the questionable conduct…and senior management approved it.”

The SEC, based on Citigroup’s documents, said the parking branches were Amsterdam, Brussels, Frankfurt, Zurich, London, Mexico, Milan, Paris, Toronto, Japan, Hong Kong, the Philippines, Singapore, Malaysia, Indonesia, India, Saudi Arabia and Mexico. They parked foreign exchange positions in NY/Nassau as well as Panama, the Channel Islands, Monaco, and Bahrain. After the "parking" scam was exposed, several European countries demanded back taxes.

The SEC report said that “the transactions engaged in by Citibank have all <u>the attributes of evasion of the law, not avoidance</u>.” It noted that <u>“elaborate</u>

efforts were made to disguise" the transactions, and the books didn't reflect the nature of the transactions. The report concluded that "it is clear that Citibank systematically and knowingly violated exchange control, tax or other laws of virtually all of the countries involved."

Laundering Money for Pinochet

In October 2004, Chile's tax authorities filed a lawsuit for tax evasion against former Chilean military dictator Augusto Pinochet. One of his tax-evasion money-laundering banks was Citibank. For 15 years, Citigroup hid and laundered at least $5 million and perhaps millions more, according to the U.S. Senate Permanent Subcommittee on Investigations. Pinochet is accused of hiding $27 million in secret overseas bank accounts under false names and of evading $2.4 million in taxes between 1980 and 2004. Continuing investigations suggest the figures could go much higher.

Citigroup ran accounts for Pinochet from 1981, when he was still military dictator of Chile after the 1973 U.S.-supported coup, until 1996. It ran accounts for his family and offshore accounts connected to the Pinochets until 2005. The total reached at least 63 U.S. accounts and CDs for Pinochet and his family. The U.S. Senate report said, "Pinochet used the Citigroup accounts to move funds within the United States and across international lines, transact business, and construct an international web of secret accounts."

In June 2002, the U.S. Office of Comptroller of the Currency (OCC), one of the country's bank regulators, asked Citigroup whether Citibank Private Bank had any accounts for Pinochet or his wife, including accounts opened under a list of disguised variants of their names. A day later, the head of Citigroup's global anti-money laundering group responded that an earlier global search had not turned up any Pinochet accounts at the bank. Of course, there were dozens.

Australia, tax evasion scheme in late 1980s

In 1988, the Australian Taxation Office (ATO) charged that Citibank had promoted a tax-evasion strategy which involved companies buying redeemable preference shares in offshore-based, tax-exempt subsidiaries. These are shares which the issuing company reserves the right to redeem at a specific or unspecified date.

According to the court record, ATO taxation auditor Douglas Franklin Booth had been investigating the scheme since 1987. The work involved audits on four Australian public companies which indicated unpaid income tax of more than $10 million and possibly as high as $100 million for 1984-1986.

In court, Robert Whiddon, Citibank's retail bank executive manager, admitted he had been working on a proposal that used an offshore Jersey fund and that details were sketched on a diagram on a whiteboard which investigators noticed during the raid.

Private Banking, the key to the system: Laundering money for Salinas, Bongo, the Abachas

The Private Bank accepts only very wealthy clients – with $5 million minimum and generally more than $10 million in deposits. It has about 25,000 of such "special clients," also known as high-net-worth individuals, or HNWIs. The Private Bank does investment guidance, estate planning, <u>assistance to minimize taxes, and also sets up off-shore accounts, and complicated schemes designed to secure the confidentiality of financial transactions, among them transactions aimed at evading taxes.</u>

U.S. Senator Carl Levin, at a hearing on the Senate Permanent Subcommittee on Investigations in 1999, said that the Private Bank of Citibank has had "a rogue's gallery of private bank clients." He mentioned "Raúl Salinas, brother of the former President of Mexico, now in prison in Mexico for murder and under investigation in Mexico for illicit enrichment; Asif Ali Zardari, husband of the former Prime Minister of Pakistan, now in prison in Pakistan for kickbacks and under indictment in Switzerland for money laundering; Omar Bongo, President of Gabon, and subject of a French criminal investigation into bribery; sons of General Sani Abacha, former military leader of Nigeria, one of whom is now in prison in Nigeria on charges of murder and under investigation in Switzerland and Nigeria for money laundering; and Jaime Lusinchi, the former President of Venezuela, charged with misappropriation of government funds; two daughters of Radon Suharto, former President of Indonesia who has been alleged to have looted billions of dollars from Indonesia; and, it appears, General Albert Stroessner, former President of Paraguay and notorious for decades for a dictatorship based on terror and profiteering."

He added, "And these are just the clients we know."

The same system Citibank used for these clients -- offshore shell companies and secret accounts – is the system it uses for the thousands of other Private Bank clients who have something to hide.

The system is standard Citigroup Private Bank practice, according to Amelia Grovas Elliott, a Cuban-American who had been with the bank for 25 years and since 1983 had headed the ten person-team that handled accounts for millionaire Mexicans. She told the U.S. Senate subcommittee how she set up a personal investment company, or PIC, to hold the investments of Raúl Salinas, brother of the then Mexican president, with the shares of that corporation owned by a trust. <u>“This was a very standard account structure in the international private banking industry, including Citibank. Such an account structure provides for</u> <u>confidentiality and also allows for</u> <u>efficient tax and estate planning</u>." She said that Salinas’s desire to transfer money out of Mexico was “exactly what many other wealthy Mexicans, including my clients, were doing at the time.” She said, “Mr. Salinas had requested a structure that I would say--I am not certain, but I would say that at least 70 percent of our Mexican clients and most of our Latin American clients use. It was a standard structure within the International Private Bank.”

Salinas wanted to put his wealth outside the country in a way that couldn't be traced. Elliott's task was to move Salinas's money from Mexico, through New York to offshore private banking investment accounts where it could be hidden from Mexican authorities. She used some of the classical money-laundering techniques: secret shell companies and accounts, a trust known only by a number, layering, and concentration (correspondent) accounts. She told Salinas that Citibank could set up an offshore investment company that would cover up his ownership of investment. The shares of the PIC would be owned by a trust, adding another layer of secrecy. Citibank helped Salinas move some $100 million from Mexico to Switzerland and London through shell companies and multiple accounts.

Elliott told a colleague, “Everybody was on board on this." She explained that on "the very, very top of the corporation this was known, Okay? On the very top." She told the subcommittee that the “top” was bank vice chairman, William Rhodes.

Bongo of Gabon

Citibank helped El Hadj Omar Bongo, dictator of Gabon since 1967, move and hide money via a network of accounts and shell companies, including Tendin Investments, Ltd., a Bahamian corporation which from 1985 to 1999 held more than $130 million.

Abachas of Nigeria

Mohammed, Ibrahim, and Abba Sani Abacha, the sons of dictator Sani Abacha, who ruled Nigeria from 1993 until his death in 1998, had three Citibank special name accounts, as well as accounts in the name of an offshore shell corporation, Morgan Procurement. Two sets of codes were used to refer to fund transfers. The London accounts held as much as $60 million at one time. The London profile for the account states: "Do not telephone Client in Nigeria."

"And these are just the clients we know," said Senator Levin.

New York District Attorney Morgenthau said, "The fact the U.S. government didn't take action [against Citigroup] is disgraceful." He told the author, "We were going to try to work out something in the Drug Enforcement Administration and bring a case. The head of the DEA was told by Justice not to cooperate with the Manhattan DA's office."

The Argentine offshore bank scam of the 1990s, plus a secret videotape wherein a Citibanker offers to launder a "businessman's" profits

In 2001, Argentina defaulted on its national bonds. Critics of the government said its inability to support the economy, to help those thrown out of work and to pay its debts resulted from massive evasion of taxes. That year, a client of Citibank in Buenos Aires secretly video-recorded a meeting with a Citibank official in which the banker offered to help him illegally evade Argentine taxes.

The client told the Citibanker, a Mr. Mariano, that he was a businessman who had just sold a company and didn't want to report all the profits. Mr. Mariano detailed how he could help him evade taxes – and assured him that he did the same for many other clients. The video was shown on the TV program, "Behind the News" in 2002 at the height of the debilitating economic crisis that years of massive capital flight and tax evasion had caused.

The Citibanker said he would send the money via a wire not in the client's name to a transit account at Citibank New York and move it from then to an International Personal Banking account. As a nonresident foreigner, the client wouldn't pay taxes. And Argentine authorities wouldn't know about his account. The Citibanker told him, "You are not going to have problems with taxes." He said, "Eighty-five percent of my clients do this operation. Eight-five percent of clients of the private bank have an offshore portfolio. They manage all the money abroad. Why? Because they are fed up with paying [taxes]."

The year of the default, the minority (Democratic) staff of the U.S. Senate Permanent Subcommittee on Investigations published a report stating that some of the millions of dollars sucked out of Argentina were laundered by two shell banks, M.A. Bank licensed in the Cayman Islands and Federal Bank licensed in the Bahamas -- banks which for ten years had had correspondent bank accounts in Citibank New York.

One of the Citibank clients, the Federal Bank, a Bahamas shell bank, was secretly owned by Raúl Moneta. Citibank officials knew that Federal Bank was an offshore bank for customers of Moneta's Banco República. Citibank was very familiar with Moneta's operations, because he was a close Citibank business associate.

The other bank with a Citigroup correspondent account was MA Bank, registered in the Cayman Islands. It was part of a finance, investment and currency exchange group -- primarily an asset management company -- called the Mercado Abierto Group owned and run by three well-known economic officials of the past military governments.

The two banks had no physical presence in any country. They were not licensed to do business in Argentina. They kept all of their money in correspondent accounts in other banks. The banks had never been examined by an independent bank examiner, yet they were able to open U.S. dollar accounts at Citibank New York and get Citibank automated computer systems for making international U.S. dollar wire transfers. Beginning in 1992, for ten years, $4.5 billion moved through Federal Bank's correspondent account at Citibank. From September 1994 through March 2000, $1.8 billion moved through M.A. Bank's correspondent account at Citibank.

What were the offshore banks doing?

Martin Lopez, a Buenos Aires Citibank official from 1985 to 2000, described Federal Bank as an offshore vehicle for the private banking customers of Banco República, providing "<u>back-to-backs and a vehicle outside Argentina where they can channel their savings,</u> which are then replaced in Banco República by Federal Bank." In effect, the depositors in Banco República sent their money to Federal Bank and then Federal Bank deposited that money back in Banco República. The depositors then "borrowed" their own money, using the foreign cash as collateral.

U.S. Senator Levin was curious. He pointed out that <u>the money "goes outside and then comes back in almost instantaneously. Can you give us the legitimate business purpose for that?"</u>

Lopez couldn't, because the answer was that <u>this was a laundering mechanism to hide profits from taxes and pretend that the cash accessed in Argentina was a loan.</u> Since this was “borrowed,” rather than “earned” money, the account holder didn’t pay taxes on it.

The two banks' customers including leading businessmen, politicians, and officials of the government and military as well as the widow of the Colombian drug trafficker Pablo Escobar.

The Central Bank was suspicious of transfers going to Federal Bank, so it asked Citibank for "all information that the Branch may have about Federal Bank Limited, especially the identity of its shareholders." The President of Citibank Argentina, Carlos Fedrigotti, lied and said bank records had no information about the bank's shareholders.

Moving Russian money offshore in the 1990s

"Russia is a large opportunity for the group," said Deryck Maughan, Citigroup vice chairman and CEO of Citigroup International, at a news conference in 2003. "The financial services market here is in its infancy. We want to offer latest banking technologies and products." Citibank would run clients' portfolios. He said that Russians willing to deposit more than $25,000 could open offshore bank accounts with Citibank to invest in foreign securities.

Russians knew how useful Citibank could be for tax evaders. A few years earlier, in 2000, the U.S. General Accounting Office (GAO) issued a report that Citigroup from 1991 through January 2000 had allowed more than $800 million in suspicious Russian funds to flow through 136 U.S. accounts tied to shell companies registered in Delaware. The corporations had been set up by a Russian immigrant who then opened Citibank accounts for them. Over 70 percent of the Citibank deposits for these accounts was quickly wire-transferred abroad, mostly to tax havens. The deposits were believed by investigators to be money fleeing taxes or the profits of criminal activities.

Japan: helping clients evade taxes

In mid-2004, the Japanese Financial Services Agency found irregularities at Citigroup's private banking unit. In particular, the authorities found that the bank failed to prevent money laundering and offered loans to clients engaged in nefarious activities ranging from tax evasion to stock market manipulation. It said Citibank officials tried to obstruct their investigation.

The regulatory authorities ordered Japanese Citibank NA to close its private banking operations, which meant shutting down four offices that served 5,000 very wealthy individuals. Citigroup complied, apologized to Japan, and fired Deryck Maughan.

The Clearstream accounts: another secret system for moving money

Banks can do international bank-to-bank transfers of cash, but when clients want to move financial paper – stocks and bonds – they need to use one of the world's two clearing houses, Clearstream in Luxembourg or Euroclear in Brussels. At the discretion of Clearstream, clients can open non-published accounts that do not figure in any printed documents or records of international financial transactions.

When law enforcers ask to see these records, they don't exist. Half of Clearstream's 15,000 accounts are unpublished. Clearstream processed 1.8 million transactions in October 2005 and has $10 trillion in assets under custody.

Citibank is a major user of Clearstream's secret accounts, with 271, more of them than any other bank. The runner up is Barclays with 200. At one time, former Citibank president Hans Angermuller was president of Clearstream.

A 1995 list of secret accounts obtained by Backes and Robert from Clearstream insiders showed that Citibank in Venezuela had eight published accounts and 20 non-published accounts. Clearstream unpublished accounts based in tax havens offer a double layer of secrecy. Among them, the 2000 list showed Citibank with 31 non-published accounts in Curaçao, 29 in Luxembourg, 10 in Aruba, 9 in Nassau, 6 in Zurich, and 5 in Jersey.

And today?

The report includes a list of 185 offshore subsidiaries listed in Citigroup's annual SEC filing. The corporation's past behavior raises questions about its continued use of the offshore secrecy system which was central to the cases described in this report.

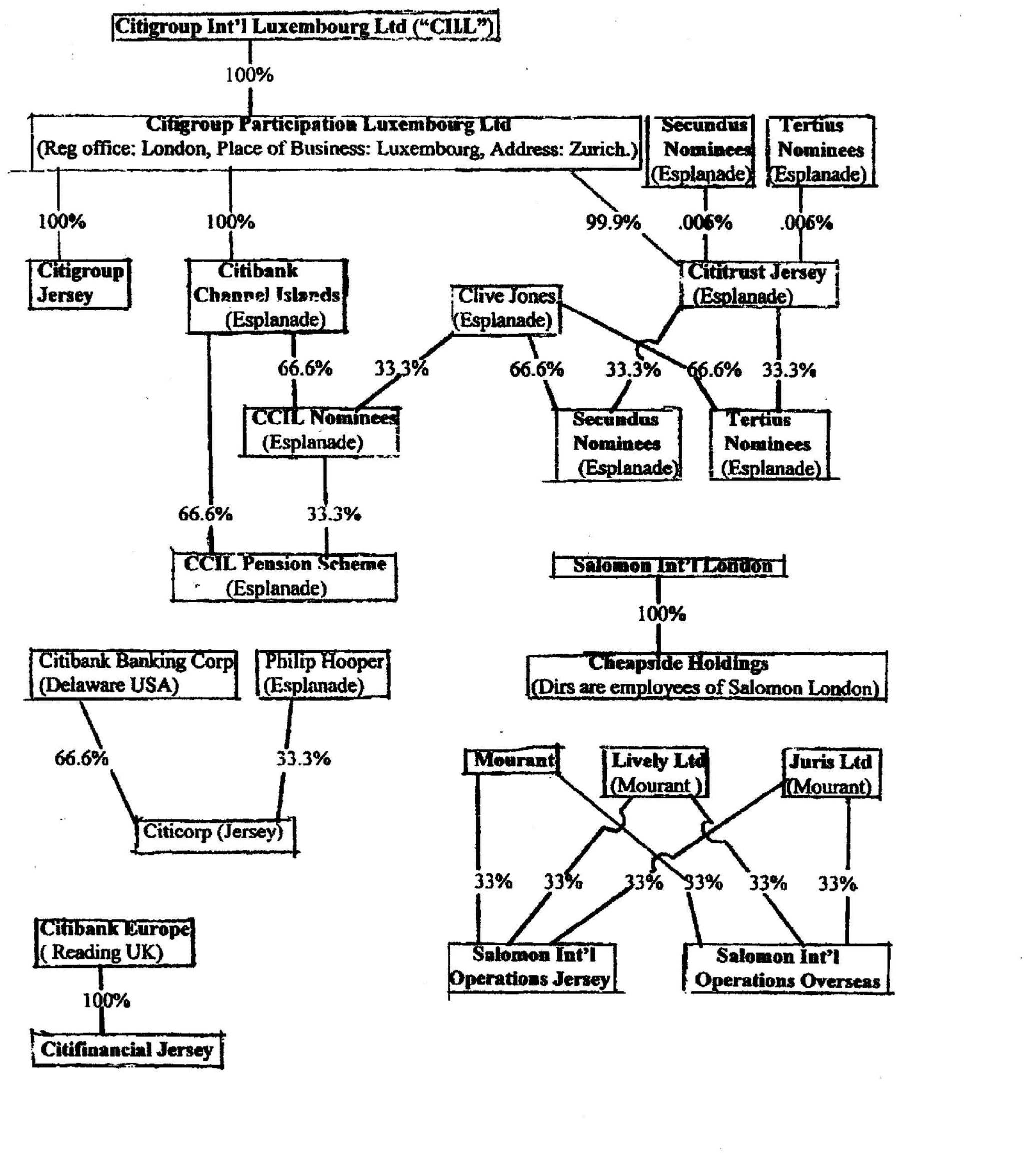
The Jersey subsidiaries

Examining offshore operations today, we chose to look at the Jersey network.

Cheapside Holdings (Jersey) Limited.
Salomon Brothers International Operations (Jersey) Limited.
Citi Financial (Jersey) Limited
Citibank (Channel Islands) Limited
CCIL (Nominees) Limited
CCIL Pension Scheme Trustees Limited.
Citigroup (Jersey) Limited
Cititrust (Jersey) Ltd

Secundus Nominees (Jersey) Limited
Tertius Nominees (Jersey) Limited
Citicorp (Jersey) Limited

The existence of these companies is not “hidden” or “secret,” but the ownership structure, as indicated in the attached chart, is curious.



The address for Citigroup in Jersey is 38 Esplanade, St. Heller, where there is an office and employees. The owner, at the top of the chart, Citigroup International Luxembourg Ltd, was, according to the official corporate records of Luxembourg, incorporated and registered in London but has its principal place of business at 58, boulevard Grande-Duchesse Charlotte, Luxembourg.

Citigroup Participation Luxembourg Ltd. is similarly registered in London with its principal place of business at the above address in Luxembourg.

The chart shows that:

Citigroup International Financial Luxembourg owns Citigroup Participation which owns Citigroup Jersey. It owns Citibank Channel Islands which owns part of CCIL Nominees and CCIL Pension Scheme.

According to the document filed with the Luxembourg authorities, in 2003 Citigroup Participation decided to raise its authorized share capital from $55,000 to $575 million and CILL contributed its Zurich branch value, worth $1.167 billion.

Connected to Citigroup Participation Luxembourg Ltd. is Cititrust Jersey, which is owned in part by Secundus and Teretus Nominees and which in turn owns part of them.

Mourant and two Mourant entities are nominal owners of two Salomon Brothers entities. Mourant, du Feu & Jeune is a law firm which sets up offshore companies in the Channel Islands. It is famous for creating the Jersey shell company, Mahonia, that enabled JP Morgan Chase to disguise billions of dollars in loans to Enron as trades.

With no direct links to the structure above is Citifinancial Jersey, shown as the subsidiary of Citibank Europe in Reading, UK.

TJN asked Citigroup:

What do these subsidiaries do?
What kinds of deals are they doing with each other? What kind of deals do they do with entities in the United States or England or Germany or France, the other financial centers?
Which are making money, which are not making money?
Can we see financial statements?
What is the policy today regarding parking or back-to-back transactions?
Is transfer pricing used to reduce taxes?
Do you have a double bookkeeping system, an MIS, to allocate profits to Citigroup subsidiaries and employees that are different than the profits declared in each country?

We sent our questions and the chart to Pam Flaherty, Citigroup's Senior Vice President for Global Community Relations, asked for answers and a meeting with Citigroup officials to discuss this report before publication, but she declined to respond.

Can Citigroup change?

The new Citigroup CEO Charles P. Prince told the Wall Street Journal that he intends to make "values" a key focus. He said, "The world's largest financial-services firm needs to 'internalize' a strong code of ethics around the globe."

Rejecting profit laundering and tax evasion for itself and its clients would be a good place to start. A first step would be a refusal to operate subsidiaries in offshore tax havens that practice bank and corporate secrecy.

Lucy Komisar is a New York investigative journalist who is writing a book about the global impact of the offshore system. She is a member of the Steering Committee of the Tax Justice Network.

Sources are list in the full report. The report and related documents are available on http://www.taxjustice.net.

--New York, January 2006

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