

Extension of FBAR Filing Deadline for Certain Offshore Investments

June 24, 2009 | Client Update

Informal comments by representatives of the IRS suggested for the first time on June 12, 2009 that investments in certain types of foreign hedge funds may constitute foreign financial accounts, for which a U.S. investor must file a Report of Foreign Bank and Financial Accounts (an "FBAR").¹ The IRS has not provided any written statement to that effect, however, or any guidance as to which types of funds would constitute foreign financial accounts for which filing is required.

If you have any questions regarding the matters covered in this publication, please reach out to any of the lawyers listed below or your usual Davis Polk contact.

Mary Conway

+1 212 450 4959
mary.conway@davispolk.com

Michael Farber

+1 212 450 4704
michael.farber@davispolk.com

Mario J. Verdolini

+1 212 450 4969
mario.verdolini@davispolk.com

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