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offshore assets and did not file tax returns or pay taxes on millions of dollars of income.

Oct. 11, 2023



Mark Anthony Gyetvay, a former CPA in Naples, Florida, has been sentenced to 86 months in prison for a scheme to hide millions of dollars of income in undisclosed Swiss bank accounts and submitting a false filing to the IRS. Gyetvay was also ordered to serve three years of supervised release and to pay a \$350,000 fine and approximately \$4,021,074 in restitution to the United States.

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company. Beginning in 2005, Gyetvay opened two different accounts at a bank in Switzerland to hold large sums of money, which at one point had an aggregate value of over \$93 million. Over a period of several years, Gyetvay took steps to conceal his ownership and control over these funds, including removing his name from the accounts and making his then-wife, a Russian citizen, the beneficial owner of the accounts. Additionally, and despite being a CPA, Gyetvay did not file personal tax returns for 2013 and 2014.

Moreover, Gyetvay did not file FBARs, as required, to disclose his control over the Swiss bank accounts, even rejecting his accountant's recommendation to do so. In an unsuccessful attempt to avoid significant financial penalties, Gyetvay made a false filing with the IRS using the Streamlined Foreign Offshore Procedures, which is only available to taxpayers whose failure to report offshore assets and income is due to non-willful conduct.

Acting Deputy Assistant Attorney General Stuart M. Goldberg of the Justice Department's Tax Division and U.S. Attorney Roger Handberg for the Middle District of Florida made the announcement.

IRS-Criminal Investigation investigated the case.

Senior Litigation Counsel Stanley J. Okula Jr., Assistant Chief David Zisseron and Trial Attorney Kevin Schneider of the Tax Division prosecuted the case with support from the U.S. Attorney's Office for the Middle District of Florida.

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