agreements. Thus the tax year for the LDF starts in January of every year instead of April in order to align the cases and facilitate this comparison.

2.4.2 Case 1

The following case is inspired by a real case from Barry & Airey.[304]

Ms Brown is domiciled and residing in the UK. She opened a Bank account in Switzerland in 2004 in order to deposit a commission of GBP 350,000.00 earned by acting as an agent in the sale of an off-shore company. The bank account accumulated income and gains of GBP 101,114 from 2004 until 2012. The income was not declared to HMRC. For her common UK taxed income, Ms Brown is treated as a higher rate taxpayer. Due to the exposure of several tax evasion cases, she decided in 2012 to declare these assets to HMRC. Ms Brown agreed with her lawyer to open a bank account in Liechtenstein and to transfer the assets in order to receive the certificate of relevance.

The case has the following parameters:

Table 4 Case 1 parameter

Year	Account balance	Interest and gains
2004	GBP 350,000	
2005	GBP 385,000	GBP 35,000
2006	GBP 411,950	GBP 26,950
2007	GBP 449,026	GBP 37,076
2008	GBP 458,006	GBP 8,981
2009	GBP 421,366	-GBP 36,640
2010	GBP 446,647	GBP 25,282
2011	GBP 451,114	GBP 4,466
2012	GBP 478,181	GBP 27,067

The expected tax burden would be as follows:

Table 5 Case 1 calculation

Taxes	Normal Taxation		LDF		LDF CRO	
Income & gains 2004 - 2009	35.5%	GBP 25,335	35.5%	GBP 25,335	40%	GBP 28,546
Income & gains 2010	35.5%	GBP 8,975	35.5%	GBP 8,975	35.5%	GBP 8,975

[304] Barry & Airey, 2012, p. 13 & 14.