## **Forbes**



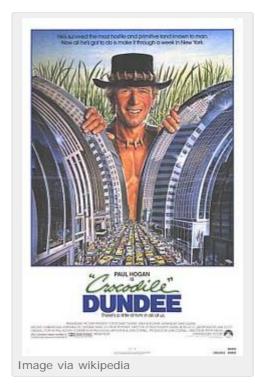
## Robert W. Wood THE TAX LAWYER

May. 4 2012 — 11:31 pm

## Crocodile Tears For Paul Hogan Tax Travails

After an 8 year tax walkabout, real life <u>Crocodile Dundee</u> writer/actor <u>Paul Hogan</u> is almost as famous in tax circles as <u>Willie Nelson</u>. Hogan has been feuding with Aussie tax authorities over more than \$150 million in taxes and penalties dating to the Crocodile days of the 1980s. Details of the deal aren't public, but it's likely the tax settlement Hogan and his manager, John Cornell, reached is outback-size.

Although Hogan lives in the U.S., his residence was questioned. In 2010, Hogan learned Aussie tax collectors had teeth after leaving his Los Angeles home to attend his mother's funeral in



Australia. When tax authorities found him they wouldn't let him leave!

Apart from the sheer size of the amounts, the <u>Australian Taxation</u>

<u>Office</u> even conducted a fraud investigation. Many tax disputes aren't too interesting, but this case had its share of Hollywood drama. Now, though, Hogan, Cornell and their entities struck a deal with the Commissioner of Taxation, their lawyer said in a <u>statement</u>.

How did Hogan's tax bill get as big as Ayer's Rock? Consider that <u>Crocodile Dundee</u> cost only \$10 million to make but earned \$175 million at the U.S. box office. It raked in another \$50 million in Australia and an estimated total box office of more than \$325 million. The two <u>sequels</u> were progressively less impressive, but there was still a lot of money for the Aussies to claim.

Hogan's issues may sound like many other celebrities. These days many tax battles involve money reported as income in one country but not where (it later develops) it counts most. Some worry the IRS may prevent someone from getting a <u>passport</u> or a green card who has a large outstanding tax bill, <u>tax lien</u> or garnishment.

The IRS and the Department of Justice cooperate to catch tax cheats, including having notorious tax scofflaws arrested if they land on U.S. soil. See GAO Report: Potential For Using Passport Issuance to Increase Collection of Unpaid Taxes. When someone is being prosecuted they may have to give up their passport. Wesley Snipes had his passport cancelled after he violated his parole while appealing his conviction for tax evasion. If he had applied for a new one, presumably he would have been turned down. This is a hot topic these days: Can IRS Prevent You From Traveling?

Remember, if you are a U.S. citizen or permanent resident you are required to report your worldwide income even if it's taxed somewhere else. You also must disclose foreign accounts and assets. See <a href="New IRS">New IRS</a>
<a href="Offshore Amnesty Announced: Third Time's A Charm">Charm</a>.

For more, see:

Paul Hogan and John Cornell finally settle row with Australian Taxation Office

**U.S. Issues Passports To Thousands Of Tax Cheats** 

Tax Expatriates: We'll Always Have Paris

Celebrity Leavings: Bidding Stars Adieu

IRS Takes A Bite Out Of Bow Wow

Your Tax Problems Are Now Everyone's Business

Lionel Richie To IRS: 'Hello Is It Me You're Looking For?'

Tax Liens Means IRS Thinks You Owe

10 IRS Rules for Stress-Free Foreign Accounts

IRS May Find "Innocent" FBAR Violation Willful

Robert W. Wood practices law with <u>Wood LLP</u>, in San Francisco. The author of more than 30 books, including Taxation of Damage Awards & Settlement Payments (4th Ed. 2009 with 2012 Supplement, <u>Tax</u> <u>Institute</u>), he can be reached at <u>Wood@WoodLLP.com</u>. This discussion is not intended as legal advice, and cannot be relied upon for any purpose without the services of a qualified professional.