

SERVICE OVERVIEW

If you owe back taxes on undeclared funds in offshore bank accounts, being proactive about disclosing your foreign funds can help reduce your chances of criminal prosecution, minimize severe IRS penalties and work out a structured IRS payment plan.

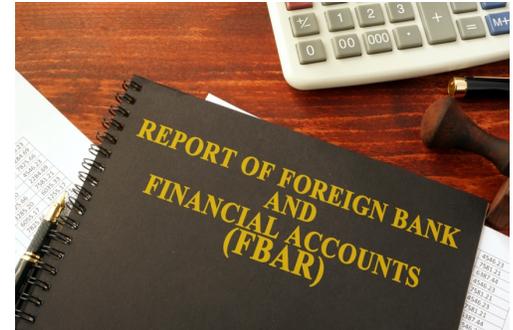
Every year the government loses billions in tax revenues from offshore accounts held by Americans. In recent years, the IRS won an agreement that has given them an unprecedented amount of information on account holders at foreign banks. As the latest IRS crackdown on the use of offshore bank accounts demonstrates, no one is safe from the wrath of the IRS - which is more determined than ever to investigate high-net-worth individuals, both at home and overseas.

If you believe you have unreported assets and owe back taxes on your foreign accounts, you need to be proactive about disclosing your foreign funds. However, you will need a tax attorney to provide professional tax help and experienced representation to proceed in your best interest.

PENALTIES

Foreign Bank Account Reporting (FBAR) penalties for not filing and meeting the amnesty guidelines are severe:

- FBAR penalties can exceed 100% of the value of the asset, plus tax penalties and interest.
- If CID makes a referral to the U.S. Department of Justice for felony indictment, the criminal sanctions can be as much as 5-years in prison.
- Due to the severity of the financial penalties and criminal implications, it is not in your best interest to wait for the IRS to approach you. Even though the amnesty deadline has passed, you should retain specialized tax representation now.



STEPS TO COMPLIANCE

You must be prepared to follow rigid procedures to obtain favorable treatment from the IRS. In other words, coming forward before the IRS is not something you do by yourself; you will need help from a firm with experience successfully representing clients before the IRS.

Depending on the magnitude of your penalties, it may be appropriate to seek redress through the penalty abatement process. For example, if you find yourself in trouble with the IRS but can prove you have a reasonable cause for your neglect or ignorance of the IRS rules, you have a chance at reducing your IRS tax penalties.

Effective representation also means your tax attorney will take over all communications with the IRS, making the required disclosures, filing FBAR reports and amending tax returns as needed.

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