

Taxation Section Webinar



Join us for a Webinar on October 27

REGISTER NOW



2010 WEBINAR – Advising Clients Seeking to Come in From the Cold: IRS Voluntary Disclosure Basics

The IRS has an established, internal voluntary disclosure practice that encourages taxpayers to come forward and disclose previously unreported income, erroneously claimed expenses, unfiled returns and/or tax due. The disclosure must be, “truthful, timely, and complete.” While the practice does not offer immunity or a guarantee against criminal prosecution, a timely voluntary disclosure is a very strong factor in the Service’s deciding whether to recommend prosecution.

This webinar session will provide an overview of the current IRS voluntary disclosure practice and some of the potential issues that can arise so that you can be in a position to properly advise your clients as to what they can expect in the process. The panelists will discuss: (i) what circumstances preclude a client from making a valid voluntary disclosure; (ii) when an attorney, rather than the taxpayer’s accountant, should be involved in this process; (iii) how many years of original or amended returns will be required; (iv) how the Service will treat taxpayers with undisclosed offshore accounts and other assets that were not disclosed during the Offshore Voluntary Disclosure program that expired October 15, 2010¹ and (v) to what extent relief is available at the state level.

Our outstanding panel of speakers will be Caroline Ciruolo and Burton (B.J.) Haynes. Caroline represents individuals and businesses in federal and state tax controversies and litigation including defending clients charged with criminal tax offenses. She is the past chair of the MSBA Section of Taxation as well as principal with Rosenberg Martin and was awarded the Janet Spragens Pro Bono Award at the ABA Tax Section meeting in January. Mr. Haynes is a former IRS Special Agent, having worked in the

IRS Criminal Investigation Division's office in Baltimore before entering private practice. He specializes in tax controversy work, including civil and criminal tax matters, civil penalties and tax litigation and is a widely recognized speaker on various topics tax including civil and criminal tax disputes as well as tax aspects of bankruptcy and divorce. Moderator is Paul Marcotte of Paley Rothman.

Title: *Taxation Section Webinar*

Date: Wednesday, October 27, 2010

Time: 12:30 PM - 2:00 PM EDT

After registering you will receive a confirmation email containing information about joining the Webinar.

System Requirements

PC-based attendees

Required: Windows® 7, Vista, XP, 2003 Server or 2000

Macintosh®-based attendees

Required: Mac OS® X 10.4.11 (Tiger®) or newer

Space is limited.

Reserve your Webinar seat now at:

<https://www1.gotomeeting.com/register/637670689>