

30 Potential IRS Interview Questions during Voluntary Disclosure Proceedings

- 1. What prompted the taxpayers to go into the voluntary disclosure program?**
- 2. Where are the funds held?**
- 3. What is the total amount of funds?**
- 4. Do you have bank records?**
- 5. What was the initial source of the funds?**
- 6. Who assisted the taxpayer in opening the bank account?**
- 7. Who told the taxpayer about the bank account (I am assuming that is an inherited account)?**
- 8. Is there a trust involved?**
- 9. How did the taxpayer deposit money into the account?**
- 10. How did the taxpayer withdraw money from the account?**
- 11. Are there any credit or debit cards associated with the accounts?**
- 12. How did the taxpayer correspond with the bank regarding the account?**
- 13. Who is the current bank contact?**
- 14. Did the taxpayer ever meet face to face with the banker?**
- 15. Did the taxpayer travel outside the U.S. to conduct banking activities?**
- 16. Where were the bank statements sent?**
- 17. Who has access to the accounts?**
- 18. Who prepared the tax returns?**
- 19. Have you prepared amended tax returns?**
- 20. Were the returns timely filed?**
- 21. Did the taxpayers know about the issues discussed today?**
- 22. Did the taxpayer file FBARs with regard to this account? If not, why not?**
- 23. If the account was inherited, when did the taxpayer take possession of the account? 24. Did the account trade in U.S. securities?**
- 25. Did the taxpayers actively trade securities in the account?**
- 26. Did the taxpayer file foreign returns?**
- 27. Does the taxpayer have any direct or indirect control over any foreign entities?**
- 28. Did the taxpayer file returns with regard to the foreign entities?**
- 29. This question is specifically directed at UBS AG account holders: Has the taxpayer been notified that the U.S. requested information pertaining to the taxpayer's UBS bank account?**
- 30. In which countries do the taxpayer have foreign accounts?**