

HAB/MOP Inclusions:

If	And	FBAR Filed	Info Report Filed	Include on HAB
The taxpayer has a foreign bank account	Income was always (in every year) reported on originally filed returns	NO	NA	NO
	Income was not reported on originally filed returns	NO	NA	YES
The TP has a Foreign Assets such as art, rental property etc.	Income from the property has not been reported	NA	NA	Yes
TP has a Foreign Asset such as art, rental property etc	There is no unreported income associated with the asset and the asset was either: 1. Purchased with previously taxed (U.S.) funds or 2. Purchased with funds not subject to US Taxation.	NA	NA	NO
TP has a Foreign Asset such as art, rental property etc.	There is no unreported income associated with the asset, but the funds used to purchase the asset were subject to US taxation and <u>no such tax was paid.</u>	NA	NA	YES
TP has an ownership interest in a foreign corporation, partnership, trust or equivalent foreign entity	Entity and any related income was always timely reported.	NA	YES or NO	NO
	Entity and any related income was not always timely reported.	NA	YES or NO	YES

The penalty applies to all assets directly owned by the taxpayer, including financial accounts holding cash, securities or other custodial assets; tangible assets such as real estate or art; and intangible assets such as patents or stock or other interests in a U.S. or foreign business.