



2011
Offshore Voluntary Disclosure
Initiative

South Atlantic Area-Case Closing Workshop
June, 2012



REVIEWER'S ROLE

- Cases must be reviewed in MIAMI!
 - ❖ 906 review
 - ❖ Case closing review
- Mandatory Check Sheet required
- Cases close to Jacksonville Tech Services
 - ❖ Grace Flowers will execute the 906



Case Closing Procedures

- 2 separate files for each taxpayer
 - Both closed through Technical Services (Status 21)
 - Income Tax certification file
 - Offshore Penalty certification file



Income Tax File

- OVDI Coversheet, (Form 895), Form 3198
- Closing letters (L1595 and L937 with envelopes), Transcript Analysis (Loader), current IMFOLI, current TXMODA
- F906 (3), Form 4549A, 1040Xs/1040s, and work papers
 - Form 4318
 - Form 9984 - Activity record
 - Foreign Account or Asset statements (submission requirement)
 - Foreign Financial Institution statements (submission requirement), if applicable
 - Correspondence
 - FBARs and/or CBRS prints
 - Foreign entity information reports (5471s, 3520/3520As, 926s, etc.)
 - Bank Statements, if applicable
 - CDE Prints
 - CI Folder



Form 9984 (Activity Record)

- Primary work paper (in addition to using to record case activities)
 - Document certification steps
 - Explanation, if no bank statements
 - Reference to other certification work papers, if applicable
 - Notate Technical Advisor approvals
 - Special Language F906's
 - Non-standard disclosure periods
 - DC 12 and DC 33 closures



Offshore Penalty File

- OVDI Coversheet, (Form 895), Form 3198
- 5345D for P9, if applicable
- Copy of F906, F8278 (signed by GM), work papers
 - Copy of F9984 (Activity record)
 - F3244A for Offshore Penalty payment
 - Offshore Penalty computation schedule
 - Supporting work papers with source document reference, if applicable

Other case closing information

FBAR Information sheet

- E-mail to *SBSE BSA Compliance-FBAR Penalty Coordinator" per Instructions on form
- Include a copy of form in FBAR section of Income Tax file

○ F3870s

- If payment transfers posted, place in Correspondence section of Income Tax file
- If payment transfers not posted and are pending, place inside case file folder(s) where easily seen by reviewer

○ E-trak: Managerial review

- Provide case file and documentation to GM or designated e-trak reviewer

○ Reviewer's checklist

- Should be with case file submitted to GM for final closure from the group

○ Closing letters

- See Reviewer's checklist