

Form 4564	Department of the Treasury Internal Revenue Service Information Document Request	Request Number
To: (Name of Taxpayer and Company, Division or Branch)	Subject: 2008 TAX AUDIT	
	Submitted to:	
	Dates of Previous Requests:	

Description of Documents Requested:

1. COPY OF THE FOLLOWING TAX RETURNS AND INFORMATION RETURN FORMS FILED, if applicable:
 - Complete copy of your Amended U.S. Individual Income Tax Returns Forms 1040, including all schedules and attached information returns (i.e., Form 5471, Form 8865, Form 3520, Form 926, etc.) for the year(s) _____.
 - Complete copy of any Amended U.S. Partnership Return of Income Form 1065 including all schedules and attached information returns for the _____ year(s) for which you were either a General Partner or named as the Tax Matters Partner.
 - Complete copy of any Amended U.S. Corporation Income Tax Return Form 1120 or 1120S, including all schedules and attached information returns for the year(s) _____ for each corporation of which you owned more than 50 percent of the total combined voting power of all classes of stock or more than 50 percent of the total value of the stock of the corporation.
 - Copy of any Annual Information Return of Foreign Trust With a U.S. Owner Form 3520-A for the year(s) _____ for which you are treated as the owner.
 - Copy of any Report Of Foreign Bank And Financial Accounts TD F90-22.1 filed for the year(s) _____.
 - Complete copy of Form 1042, Annual Withholding Tax Return for U.S. Source Income of Foreign Persons including Form(s) 1042S, Foreign Person's U.S. Source Income Subject to Withholding, for the year(s) _____.
2. All monthly statements for bank or financial accounts at domestic or foreign banks (not already provided in response to the prior request), savings and loans, credit unions, or other financial institution, under any name, over which you had signature

Information Due By _____ At Next Appointment Mail In

FROM	Name and Title of Requestor Internal Revenue Agent	Date: March 27, 2013
	Office Location:	

Form 4564	Department of the Treasury Internal Revenue Service Information Document Request	Request Number
To: (Name of Taxpayer and Company, Division or Branch)	Subject: 2008 TAX AUDIT	
	Submitted to:	
	Dates of Previous Requests:	

Description of Documents Requested:

¹ or over which you exercised control, either directly or through nominees, agents, powers of attorney, letters of direction, or any device whatsoever for the period December 1, _____ through January 31, _____. In addition, provide duplicate deposit slips and/or verification of the origin of all deposited items for all deposits; copies of all debit and credit memos; copies of all wire transfer authorizations; all cancelled checks and check registers for these accounts.

3. All Statements of Certificate of Deposit (not already provided in response to the prior request) for all Certificates of Deposit, Time Deposit, or equivalent accounts at domestic or foreign financial institutions over which you had signature authority or other authority, or over which you exercised control, either directly or through nominees, agents, powers of attorney, letters of direction, or any device whatsoever, and which was in existence at any time during the year(s) _____. In addition, provide verification of the origin of all funds used to open these accounts or deposited to these accounts at any time.
4. For any transfers of funds during the year(s) ____ between all bank or financial accounts domestic or foreign over which you have signature or other authority, or over which you exercised control, either directly or through nominees, agents, powers of attorney, letters of direction, or any device whatsoever, please provide the following:

a) A list of such transfers.

* * * *

¹ **Signature or Other Authority Over an Account** A person has signature authority over an account if such person can control the disposition of money or other property in it by delivery of a document containing his or her signature (or his or her signature and that of one or more other persons) to the bank or other person with whom the account is maintained. Other authority exists in a person who can exercise comparable power over an account by direct communication to the bank or other person with whom the account is maintained, either orally or by some other means.

Information Due By _____ At Next Appointment Mail In

FROM	Name and Title of Requestor Internal Revenue Agent	Date: March 27, 2013
	Office Location:	

Form 4564	Department of the Treasury Internal Revenue Service Information Document Request	Request Number
To: (Name of Taxpayer and Company, Division or Branch)	Subject: 2008 TAX AUDIT	
	Submitted to:	
	Dates of Previous Requests:	

Description of Documents Requested:

- b) If you wrote a check from one account that was then deposited into another account provide a copy (front & back) of the cancelled check.
 - c) If you wired the money from one account on which you had authority to another account for which you had authority, provide the wire transfer authorization including a copy of the bank statement of the account from which the money was transferred **and** the statement of the account to which the money was deposited showing this transaction.
 - d) If you deposited cash then provide a bank statement from the account that this cash was withdrawn from, **and** the statement of the account it was deposited to.
 - e) Copies of any advice, correspondence or other direction you may have communicated regarding the withdrawal and/or deposit
5. List of all credit/debit/charge cards, foreign or domestic, under any name, used by you to make purchases, cash withdrawals or advances or to pay expenses for any purpose, including personal or business use, during the year(s) _____. Include the name or company the card is issued to, the card account number and the name and address of the issuer of the credit/debit/charge card and a copy of the application for card. In addition, provide all charge statements and charge receipts for all cards on such accounts that have not already been provided for the year(s) _____.
 6. Please list all other credit/debit/charge cards, under any name, over which you held withdrawal privileges, whether or not actually used.
 7. Please provide a schematic diagram of all entities, foreign and domestic, in which you held an ownership interest, legal or beneficial, at any time during the tax year(s) ending December 31, ____, December 31, ____ and December 31, _____. This diagram should include partnerships, joint ventures and trusts as well as corporate entities, including their foreign branches, and any other type of entity

Information Due By _____ At Next Appointment Mail In

FROM	Name and Title of Requestor Internal Revenue Agent	Date: March 27, 2013
	Office Location:	

Form 4564	Department of the Treasury Internal Revenue Service Information Document Request	Request Number
To: (Name of Taxpayer and Company, Division or Branch)	Subject: 2008 TAX AUDIT	
	Submitted to:	
	Dates of Previous Requests:	

Description of Documents Requested:

provided for by foreign laws, in which you held a direct or indirect, legal or beneficial, ownership interest.

- a) Indicate your percentage of ownership interest in each entity.
 - b) Indicate the country in which the entity was created or organized.
 - c) Indicate the country where the entity operates.
 - d) Indicate whether the entity was formed for a particular purpose and what assets are held by the entity.
 - e) Indicate any changes in ownership occurring during the tax year(s) ending December 31, ____, December 31, ____ and December 31, ____.
 - 1) Provide detailed information regarding any corporation or other entities which you owned during the calendar year ending December 31, ____, December 31, ____ and December 31, ____ but which you no longer owned for your calendar year ending December 31, ____.
Include the tax treatment of each change.
8. During the tax year(s) ____ if you paid any foreign or domestic entity or individual:
- a) Management Fees
 - b) Consulting Fees
 - c) Research and Development Fees
 - d) Insurance Premiums
 - e) Legal Fees
 - f) Brokerage Fees
 - g) Royalties
 - h) Lease or Rental Fees
 - i) Loan Fees
 - j) Interest

Information Due By _____ At Next Appointment Mail In

FROM	Name and Title of Requestor Internal Revenue Agent	Date: March 27, 2013
	Office Location:	

Form 4564	Department of the Treasury Internal Revenue Service Information Document Request	Request Number
To: (Name of Taxpayer and Company, Division or Branch)	Subject: 2008 TAX AUDIT	
	Submitted to:	
	Dates of Previous Requests:	

Description of Documents Requested:

k) Salaries or Wages,

Please list the amount of the fees, the name, address and telephone number of the person paid, and the date of each payment. In addition, provide copies of all contracts, agreements, invoices and correspondence concerning the negotiation of, the contracting of and the payment of these fees.

9. Please provide the name, address, and telephone number of all professionals, including but not limited to, private banker, broker, investment or other financial advisor, advisor on privacy matters, lawyer, and accountant from whom you received advice or services during the year(s)_____.
10. Please provide a copy of your current passport and any expired passports.
11. Please provide a written history of all foreign financial accounts under any name, over which you had signature or other authority or over which you exercised control, either directly or through nominees, agents, powers of attorney, letters of direction, or any device whatsoever that was in existence during the years(s)_____. Please include the following information:
 - a) Date account opened
 - b) Source of the funds used to open the account
 - c) Name of Financial Institution
 - d) Name of the account and Account Number
 - e) Legal titled owner of the account and any/all beneficial owners
 - f) If the account has been closed – date of closure and where and how the funds were taken. Please provide adequate documentation to substantiate the closures and/ relinquishment of ownership (direct/indirect/legal/beneficial).

Information Due By _____ At Next Appointment Mail In

FROM	Name and Title of Requestor Internal Revenue Agent	Date: March 27, 2013
	Office Location:	

Form 4564	Department of the Treasury Internal Revenue Service Information Document Request	Request Number
To: (Name of Taxpayer and Company, Division or Branch)	Subject: 2008 TAX AUDIT	
	Submitted to:	
	Dates of Previous Requests:	

Description of Documents Requested:

12. Please provide the following information regarding all foreign and domestic trusts for which you are a legal and/or beneficial owner, grantor, beneficiary that was in existence during the year(s)____:

- a) Creation Documents
- b) Documentation of any changes to ownership, beneficiaries, or operation
- c) If the trust has been dissolved, please provide the dissolution documents
- d) If the trust has been audited by the Internal Revenue Service or other government entity, please provide all documentation regarding the outcome of the audit.

Please be advised that we may require additional information and documentation as we determine necessary as the examination progresses.

Information Due By _____ At Next Appointment Mail In

FROM	Name and Title of Requestor Internal Revenue Agent	Date: March 27, 2013
	Office Location:	