



DEPUTY COMMISSIONER

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

June 1, 2011

MEMORANDUM FOR COMMISSIONER, LARGE BUSINESS AND INTERNATIONAL
DIVISION
COMMISSIONER, SMALL BUSINESS/SELF-EMPLOYED
DIVISION

FROM:


Steven T. Miller
Deputy Commissioner for Services and Enforcement

SUBJECT:

Guidance for Opt Out and Removal of Taxpayers from the Civil
Settlement Structure of the 2009 Offshore Voluntary Disclosure
Program (2009 OVDP) and the 2011 Offshore Voluntary
Disclosure Initiative (2011 OVDI)

Based on the feedback received from agents, managers, and practitioners, which demonstrated the need for additional guidance in the processing of offshore voluntary disclosure cases, I am issuing the attached guide to set forth the steps to be taken before and after a taxpayer opts out or is removed from the civil settlement structure of the 2009 OVDP or 2011 OVDI. Opt out and removal are two additional processes for resolving voluntary disclosure cases. The procedures have been designed to balance the interests at stake, to ensure fairness and consistency for all taxpayers in the 2009 OVDP and 2011 OVDI, and to allow for flexibility where necessary.

I want to thank you for all the hard work that has been done on these cases to date. I recognize that some of these cases involve difficult issues. I want to thank you for your continued diligence and professionalism especially as we continue to fine tune the program.

If you have any questions or comments about these procedures, please send an email to: "Opt Outs Removals Offshore Voluntary Disclosures."

Attachment

cc: Chief Counsel
Commissioner, Tax Exempt and Government Entities
Chief, Criminal Investigation
Chief, Appeals

Memorandum For Pyc26may June 2011

Huangqi Zhang



Memorandum For Pyc26may June 2011:

Whispering the Techniques of Language: An Psychological Quest through **Memorandum For Pyc26may June 2011**

In a digitally-driven world wherever displays reign supreme and immediate conversation drowns out the subtleties of language, the profound techniques and emotional subtleties concealed within words usually go unheard. Yet, situated within the pages of **Memorandum For Pyc26may June 2011** a fascinating literary value pulsating with raw feelings, lies a fantastic journey waiting to be undertaken. Penned by a talented wordsmith, this marvelous opus encourages readers on an introspective trip, delicately unraveling the veiled truths and profound impact resonating within the material of each and every word. Within the mental depths of the moving evaluation, we shall embark upon a honest exploration of the book is primary themes, dissect their interesting writing style, and succumb to the strong resonance it evokes heavy within the recesses of readers hearts.

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