

# SCHWERIN TO PRESENT AT 2018 INTERNATIONAL TAX ENFORCEMENT UPDATE

*Posted on June 15, 2018 by Michelle F. Schwerin*



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On June 20<sup>th</sup>, Michelle F. Schwerin will present at the [Agostino & Associates](#) Annual International Tax Enforcement Update. This annual event brings tax professionals together in New Jersey to share their experiences and discuss current events and best practices relating to International Tax Enforcement and Voluntary Disclosures.

## **Representing Taxpayers Before IRS Appeals with respect to Penalties Resulting from the Failure to Report Foreign Income or Assets**

Michelle and three other attorneys will present a session entitled: "Representing Taxpayers Before IRS Appeals with respect to Penalties Resulting from the Failure to Report Foreign Income or Assets". Topics will focus on: (1) The Pre-Assessment Appeal & the Impact on CDP; (2) The Issues for the Post Assessment Appeal; (3) Appeals from Claims for Refund &/or Abatement; and (4) Penalty Mitigation.

The choice of a lawyer is an important decision and should not be based solely upon advertisements.

# International Tax Enforcement Update

The year's update reviews the life-cycle of an international tax controversy including (a) the most common errors on returns required to be filed by US Persons reporting foreign assets and income, (b) the procedures used by the IRS to determine a liability based on foreign income, deductions, and assets, (c) the options available to contest and compromise the international adjustments and penalties before the IRS Office of Appeals, including accelerated appeals, collection due process hearings, and (d) the best practices for litigating international issues in the Tax Court and other federal courts.



For additional information, please [visit the event page](#).

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