

# SCHWERIN PRESENTS ON IRS VOLUNTARY DISCLOSURES DURING ABA 2020 VIRTUAL MAY TAX MEETING

Posted on July 14, 2020 by Michelle F. Schwerin



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On July 14, 2020, Michelle F. Schwerin will participate on a webinar entitled, "When You Need to Disclose More Than Just a Tax Crime." The webinar is a part of the American Bar Association Section of Taxation's Virtual 2020 May Tax Meeting, which replaced the in-person annual May tax conference.

## When You Need to Disclose More Than Just a Tax Crime

### Presentation Description:

*Under the IRS voluntary disclosure practice, in exchange for a timely, accurate, and complete disclosure and full cooperation during the associated audit, the IRS will not refer the taxpayers to the U.S. Department of Justice for criminal investigation and prosecution. But what if your client committed non-tax offenses that do not require a referral from the IRS? What is the risk that the IRS will share the information with another federal agency, who may choose to prosecute? Will the voluntary disclosure protect a taxpayer from prosecution for hiring or harboring undocumented workers, failing to file Forms 8300, or other non-tax*

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*criminal conduct? Panelists will review frequent dilemmas faced when a client engages in criminal conduct outside of the Internal Revenue Code, options available to address these issues, how the IRS will treat, and whether it will disseminate, such information received through a voluntary disclosure, and best practices in these cases.*

For additional information, please visit: [Virtual 2020 May Tax Meeting](#) or [When You Need to Disclose More Than Just a Tax Crime](#)

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