

# Penalty Strategies that Work

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Dan's practice focuses on federal tax and Title 31 matters including civil and criminal defense of IRS audits and investigations, tax litigation, and much more. Before founding his own firm, Law Offices of Daniel N. Price, PLLC, Dan served as an attorney for the Office of Chief Counsel of the IRS for more than 19 years. Dan's government service included extensive courtroom litigation. Dan significantly contributed to IRS enforcement of international reporting and FBAR reporting. Dan's deep expertise concerning the IRS' voluntary disclosure practice, the Streamlined Filing Compliance Procedures, and international penalties allows him craft strategies to mitigate civil penalties and criminal exposure. Dan further assists taxpayers in battling all varieties of significant penalties assessed by the IRS and certain state tax authorities.

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# Agenda

- Penalties Are an IRS Priority
- The State of Penalty Administration
- Penalty Strategies

# Penalties Are An IRS Priority

## Penalties Are An IRS Priority

(4) Although penalties support and encourage voluntary compliance, they also serve to bring additional revenues into the Treasury and indirectly fund enforcement costs. However, these results are not reasons for creating or imposing penalties.

(5) **Penalties advance the mission of the IRS when they encourage voluntary compliance.** The IRS has formalized this obligation to the public in its mission statement.

(6) Voluntary compliance is achieved when a taxpayer makes a good faith effort to meet the tax obligations defined by the Internal Revenue Code. ...

(10) **Penalties should relate to the standards of behavior they encourage.** Penalties best aid voluntary compliance if they support belief in the fairness and effectiveness of the tax system

I.R.M. 20.1.1.2.1 Encouraging Voluntary Compliance.

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71<sup>st</sup> Annual Taxation Conference: Day 2 - Focus on Tax Controversy session  
"Penalty Abatement Strategies That Work"