

Penalty Strategies that Work

The University of Texas School of Law 71st Annual Taxation Conference

December 13-14, 2023

AT&T Conference Center, Austin, TX

Daniel N. Price

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.

www.pricetaxlaw.com

Phone: 210-960-2920



Disclaimer

These slides are shorthand aids to an oral presentation. Neither these slides nor the oral presentation constitute legal or tax advice.

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.

Find the full text of this and thousands of other resources from leading experts in dozens of legal practice areas in the [UT Law CLE eLibrary \(utcle.org/elibrary\)](https://utcle.org/elibrary)

Title search: Penalty Strategies That Work

Also available as part of the eCourse

[2023 Taxation eConference: Day 2 - Focus on Tax Controversy](#)

First appeared as part of the conference materials for the
71st Annual Taxation Conference: Day 2 - Focus on Tax Controversy session
"Penalty Abatement Strategies That Work"