

Links Provided for US Expats:

(Check back periodically – new links and downloads may be added from time to time)

Added Dec. 6, 2019:

AM800 Radio Interview with Alexander Marino, US Tax Lawyer – one of our four Pathways to US Tax Seminar Panel Speakers on FBAR's, Streamlined filings, and Renunciation: Starts at 1:32 (20 minutes) <https://www.iheartradio.ca/am800/audio/sunday-morning-live-alexander-marino-1.10086661>

IRS: Report of Foreign Bank and Financial Accounts – Links to Streamlined Procedures and FBAR information and FBAR Webinar, Guide, fact sheet:

<https://www.irs.gov/businesses/small-businesses-self-employed/report-of-foreign-bank-and-financial-accounts-fbar>

IRS: New Procedure – For those who have or are renouncing:

<https://www.irs.gov/newsroom/irs-announces-new-procedures-to-enable-certain-expatriated-individuals-a-way-to-come-into-compliance-with-their-us-tax-and-filing-obligations>

IRS Webinar – Relief Procedures for Certain Former Citizens:

<https://www.irsvideos.gov/Individual/education/ReliefForFormerCertainCitizens>

US Citizens residing Outside USA:

<https://www.irs.gov/individuals/international-taxpayers/u-s-taxpayers-residing-outside-the-united-states>

US Expat Sites with information links: (Ignore all references to OVDP – that program ceased)

<https://americansoverseas.org/en/knowledge-centre/filing-tax-returns/what-is-streamlined-procedure/>

Cases – re: Penalties on FBAR's:

April 23, 2019: \$10,000 penalty per unreported account per year upheld in Court:

Case where taxpayer Jane Boyd (UK) was taken to court to prove US IRS could charge \$10,000 USD penalty for UNWILFUL failure to file on EACH foreign financial bank account that was unreported on an FBAR in one tax year. Courts agreed with IRS and charged over \$50,000 penalties for the one 2010 year:

<https://docs.justia.com/cases/federal/district-courts/california/cacdce/2:2018cv00803/700106/48>

Nov. 15, 2019: Brief filed urging Appeals Court to limit financial penalties imposed on filers holding foreign bank accounts to one \$10,000 max per year – Unwilful Failure to File FBAR

Pathways to US Tax seminar panel Speaker (Nov 2, 2019 Windsor, Ontario): **Caroline Ciralo of Kostelanetz & Fink** has brought this request in light of the Jane Boyd Case – that applied the \$10,000 penalty on EACH Foreign Account unfiled on FBAR in one year. Argues the legislation permits a maximum of ONE \$10,000 penalty per FBAR regardless of number of accounts.

<https://www.prweb.com/releases/american-college-of-tax-counsel-files-brief-urging-appeals-court-to-limit-financial-penalties-imposed-on-tax-filers-holding-foreign-accounts/prweb16756934.htm>