

# Your Clients Have Offshore Accounts or Investments - Keeping Them Out of the Crosshairs of the IRS

April 17, 2009

Taxpayers with previously unreported or underreported foreign holdings should consider voluntary disclosure as a valuable risk definition and risk mitigation strategy. Carlton Fields is uniquely positioned to advise taxpayers with respect to both the tax and potential criminal implications of such a strategy, and to help taxpayers define the risk of not entering a voluntary disclosure action. Our attorneys experienced in both tax and white collar crime defense function as a team to pursue the most favorable results on both fronts.

## **Related Practices**

[Tax](#)

[White Collar Crime & Government Investigations](#)

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