



# IRS Enforcement Update

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# DOGE – What are the plans?



# IRS Staffing



# IRS at the Border



# IRS Commissioner Nominee – Billy Long



# Project 2025

- Income Tax Rates
  - 15% Rate
  - 30% Rate
  - Deduction elimination?
- Capital Gains Rates
- Extension of Tax Cuts & Jobs Act
- Corporate Tax Rate
- Estate & Gift Tax
- Consumption Tax

# Decoding Trump's Tariffs



# Key Areas of IRS Focus for 2025

- Enhancing live assistance
- Expanding online services
- Accelerating digitalization
- Simplifying notices
- Disrupting tax scams and schemes
- Modernizing foundational technology and aged programming
- Modernizing how the IRS attracts, retains, develops, and empowers employees
- Improving IRS employee tools
- Ensuring fairness in enforcement
- Increasing compliance efforts on the wealthiest taxpayers, large corporations, and complex partnerships.
- Expanding Direct File



# Top 10 IRS Criminal Cases 2024

10. Former attorney sentenced to 25 years in federal prison on embezzlement and fraud charges in connection with collapse of Washington Federal Bank
9. Former law firm partner sentenced to 10 years in prison for laundering \$400 million of OneCoin fraud proceeds
8. Former Los Angeles politician José Huizar sentenced to 13 years in federal prison for racketeering conspiracy and tax evasion
7. Suburban Chicago man sentenced to 18 years in prison for trafficking fentanyl and attempting to support ISIS
6. Leader of sophisticated stolen identity tax refund scheme sentenced
5. Former Jacksonville Jaguars employee sentenced to more than six years for embezzling in excess of \$22 million
4. Bitcoin Fog operator sentenced for money laundering conspiracy
3. Two tax shelter promoters sentenced for billion-dollar SCE tax scheme; two more CPAs plead guilty
2. Binance and CEO plead guilty to federal charges in \$4 billion resolution
1. Former Army civilian employee sentenced to 15 years in federal prison for \$100 million fraud scheme

# Loper Bright v. Raimondo



# Liberty Global v. U.S.





# Employee Retention Credit Docket



# Beneficial Ownership Reporting



# Voluntary Disclosure Changes

Form <b>14457</b> (November 2024)	Department of the Treasury–Internal Revenue Service <b>Voluntary Disclosure Practice Preclearance Request and Application</b>	OMB Number 1545-2241
Part being completed		
<input type="checkbox"/> Part I - Preclearance Request	<input type="checkbox"/> Part II - Voluntary Disclosure	
<b>Note:</b> Use Part I of this form to make a preclearance request to determine whether you are eligible to use the Voluntary Disclosure Practice (VDP). Only submit Part I of this form for preclearance. If you receive preclearance, proceed with submitting Part II to request preliminary acceptance. Submitting the information requested in Part I of this form does not guarantee acceptance. <b>All answers and attachments must be in English.</b>		
<b>Part I - Preclearance Request</b> (eFax to 844-253-5613 or email to <a href="mailto:vdp@ci.irs.gov">vdp@ci.irs.gov</a> )		

# Large Business & International Campaigns – Selected Issues





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# Large Business & International Campaigns – Selected Issues

- Erroneous Refundable Credits – i.e., Employee Retention Credit



# Large Business & International Campaigns – Selected Issues

- Syndicated Conservation Easement Transactions



# Large Business & International Campaigns – Selected Issues

- Puerto Rico Act 22 - taxpayers who have claimed benefits through Puerto Rico Act 22 without meeting the requirements of IRC Section 937



# Large Business & International Campaigns – Selected Issues

- Micro-Captive Insurance Campaign





# Large Business & International Campaigns – Selected Issues

- FATCA Filing Accuracy



# Large Business & International Campaigns – Selected Issues

- High Income Non-filer



# Business Aircraft Campaign





# 355 Transactions - Costs





# Deferred Legal Fees



# Expatriation of Individuals



# Financial Services Entities





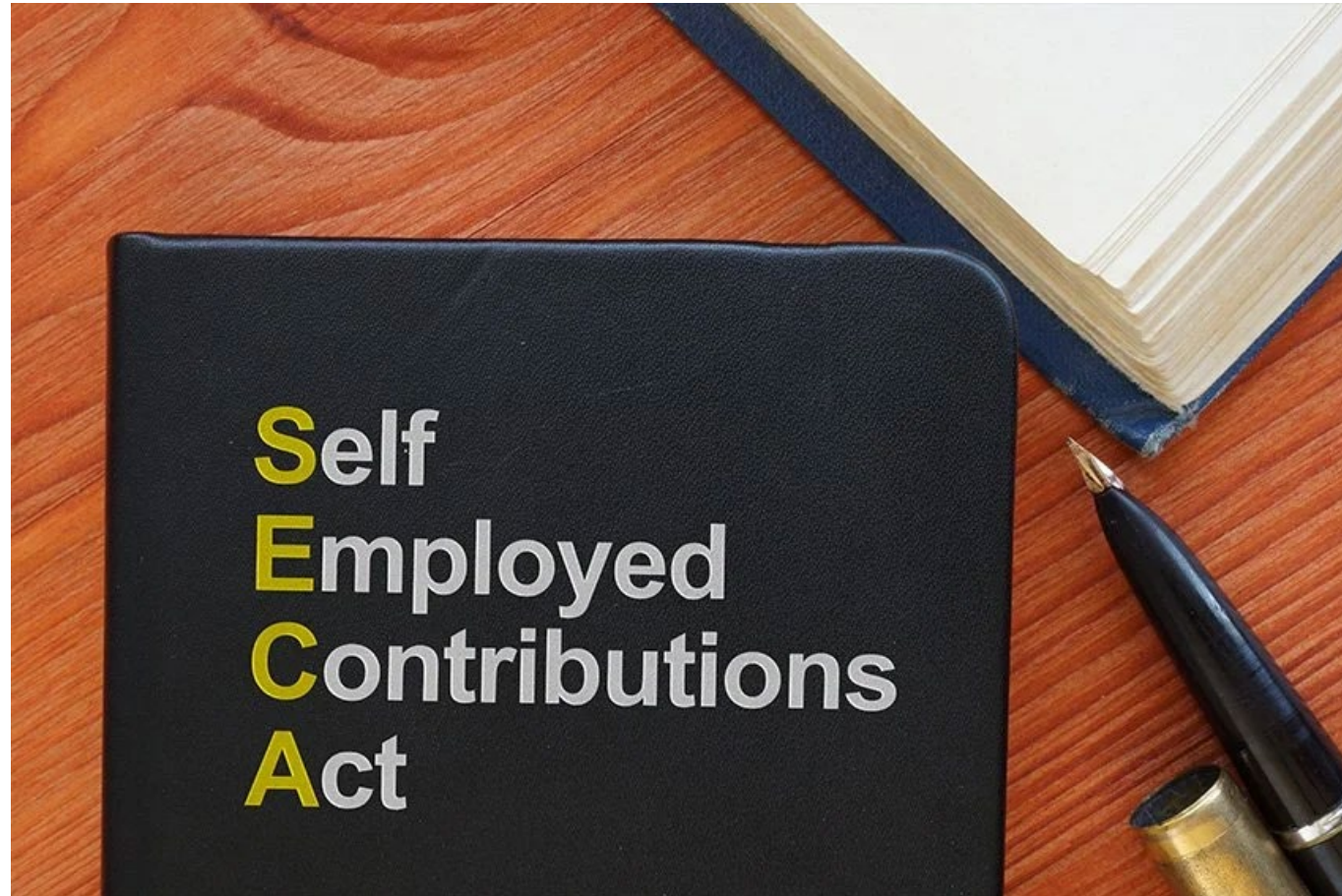
# Partnership Losses In Excess of Basis



# Research Credits



# SECA Tax





# Criminal Investigation Priorities

- Abusive Tax Schemes

Tuesday, February 13, 2018

## ***FBI, IRS Raid Dallas Offices Of Tax Lawyer Joe Garza***

By Paul Caron

10.3k  
Shares



Dallas Morning News, [FBI and IRS Raid Dallas Offices of Tax Planning Attorney, Say Neighboring Tenants:](#)

A team of FBI and IRS agents on Tuesday searched a North Dallas office building, authorities said. ... Brint Ryan, who has an office in the building, said about 40 agents were at the offices of [Garza & Harris](#).

[Joe B. Garza](#) is a Dallas tax planning attorney known for his "aggressive" tax shelters. ... [Garza's website](#) says he has negotiated and closed "more than \$300 million of debt transactions" and "over \$1 billion of tax exempt bond transactions as bond counsel for the state of Texas." ...



But Garza's promotion of certain shelters has resulted in costly adverse tax rulings against his clients, according to court records. Garza promoted and sold to clients a variety of the notorious "[Son of Boss](#)" tax shelter, which the IRS ruled was abusive if used to create artificial tax losses that could offset other income, according to federal court records.

# Criminal Investigation Priorities

- Cryptocurrency





# Criminal Investigation Priorities

- Employment Tax Fraud



# Criminal Investigation Priorities

- Bank Secrecy Act



# Criminal Investigation Priorities

- General Tax Fraud



# Criminal Investigation Priorities

- 2024 Annual Report





# Solutions

- Voluntary Disclosure



# Solutions

- Quiet Disclosures & Qualified Amended Returns



# Solutions

- Settlement Initiatives



