



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

CRIMINAL INVESTIGATION

Holtz, Slavett & Drabkin
Gary M. Slavett
270 N. Canon Drive, Penthouse
Beverly Hills, CA 90210

In Re:

Dear Mr. Slavett:

This letter is to inform you that the voluntary disclosure of your clients, [redacted] and [redacted], has been preliminarily accepted. This acceptance is conditioned upon the information provided by [redacted] being, and remaining, truthful, timely, and complete.

A voluntary disclosure will not automatically guarantee immunity from prosecution; however, a voluntary disclosure may result in prosecution not being recommended.

Please be aware that to make a voluntary disclosure complete, your clients must fully cooperate with the IRS in determining the correct and appropriate tax liability and pay or make bona fide arrangements to pay in full, any tax, interest, and penalties determined by the IRS to be applicable. This required cooperation includes the production of all requested documents and the taxpayer submitting to an interview if requested by the examining agent.

Your client's voluntary disclosure will be forwarded for civil examination and the determination of the correct tax liability. A Revenue Agent will be contacting you regarding this matter.

This matter may be considered for the imposition of additional civil sanctions and/or criminal investigation should a subsequent determination be made that your client has not fully cooperated and/or has provided materially false information.

If you have any further questions please contact Supervisory Special Agent [redacted] at [redacted].

Sincerely,

Leslie P. DeMarco
Special Agent in Charge
Los Angeles Field Office

Provided by: Holtz Slavett & Drabkin
www.hsdtaxlaw.com