



Audit Defense & Remediation

Consulting Services

OVERVIEW

In 2008, the Internal Revenue Service (“IRS”) published Internal Revenue Manual (“IRM”) section 4.10.21, setting forth the examination process for U.S. withholding agent Form 1042 Audits. The IRM provides general guidance for audits of U.S. financial institutions with nonresident alien (“NRA”) withholding tax and reporting requirements. A year later, the Large and Mid Sized Business (“LMSB”) Unit elevated section 1441 reporting and withholding on U.S. source FDAP income to a Tier 1 Issue. The LMSB considers this issue to be of high strategic importance involving many taxpayers, significant dollars, and substantial compliance risk. Form 1042 Audits are now one of the LMSB’s highest compliance priorities. Are you audit ready?

AUDIT DEFENSE & REMEDIATION

BSM and CTI can provide direction and assistance during the Form 1042 audit process. Conducting a thorough review of tax documentation and implementing a process to cure any insufficiencies will give you peace of mind and the ability to focus on other areas of tax compliance.

Additionally, BSM and CTI will:

- Organize and prepare materials to use in the IRS audit or potential related litigation.
- Simplify complex rules and regulations to help the organization ensure compliance.
- Remediate current procedures and documentation failures.
- Employ statistical analysis to help focus remediation efforts on high value accounts.
- Represent the organization before the IRS in negotiations and in legal actions.

BSM and CTI has helped mitigate millions of dollars in exposure for financial institutions and financial service firms due to non-compliance exposure by conducting thorough audits and remediations using its legal, tax technical, statistical, and technological expertise. Let us help you.

What Makes Us Unique?

Significant IRS experience gives you the knowledgeable resources you need.

Broad operational and industry experience gets you the expertise you deserve.

Experienced business analysts, system analysts, and project managers know your business.

Big Four background provides you with confidence in our results.

Extensive audit and remediation background gives you the experience you need.

Proven methodology gives you peace of mind.

Tax law experts help you get the right answer the first time.

ABOUT US

Burt, Staples & Maner, LLP (“BSM”) is an international law firm with offices in Washington D.C. and London specializing in every aspect of U.S. and international taxation. The Firm’s lawyers bring to the practice their government and inter-governmental experience in tax policy, administration, and litigation acquired at the IRS and related agencies, as well as their experience at Big Four accounting firms.

Compliance Technologies International, LLP (“CTI”) is the leader in cutting edge global tax withholding and information return reporting technology, consulting, and outsourcing services. We have a strong team of highly experienced international and domestic tax professionals, ranging from lawyers and accountants to software engineers and operations experts located in Boston, Los Angeles, New York, Washington D.C., and London.

BSM and CTI can keep you compliant with:

- Expert understanding of the tax withholding and information return reporting regulations from industry leading tax professionals.
- Comprehensive documentation and reporting audits using proven methodologies from expert tax technical analysts.
- Statistical analysis to aide in the remediation effort and dramatically reduce exposure by focusing on high exposure strata.
- Thorough system audits from system analysts with extensive tax technical experience.
- Focused gap analysis to help you identify and solve problems, while remediating current issues.
- Complete suite of tax document validation, reporting, and withholding tools to help you achieve and maintain compliance.

DISTINCT EXPERTISE

The BSM and CTI team prides itself in being different. Our unique set of experience, personnel, and resources helps our clients stay ahead of the curve. Eight of the world’s top financial institutions depend on us to be compliant. Shouldn’t you?

CONTACT US

Burt, Staples & Maner, LLP
District of Columbia: 202-783-1500
www.bsmlegal.com
jstaples@bsmlegal.com

Compliance Technologies International, LLP
Boston: 617-963-3412
www.cticompliance.com
cdaftary@bsmlegal.com

BURT, STAPLES & MANER, LLP
WASHINGTON | LONDON

