Department of the Treasury - Internal Revenue Service

Streamlined Domestic Penalty Reconsideration Request Related to Canadian Retirement Plans

OMB Number 1545-2241

Note: Before completing this form, please review the "Streamlined Filing Compliance Procedures for U.S. Taxpayers Residing in the United States Frequently Asked Questions and Answers" on <u>www.irs.gov</u>.

Name(s) of taxpayer(s)	TIN(s) of taxpayer(s)	
Mailing address of taxpayer(s)	Telephone number of taxpayer(s)	

Note: If spouses previously submitted a joint certification, both spouses must sign this form. If this reconsideration request is a joint request, the statements will be considered made on behalf of both spouses, even though singular pronouns are used.

In my original Form 14654, Certification by U.S. Person Residing in the United States for Streamlined Domestic Offshore Procedures, I included the value of my interest in one or more **Canadian** retirement plans described in Rev. Proc. 2014-55 ("Canadian retirement plans") in the Highest Account Balance/Asset Value and paid the 5% miscellaneous offshore penalty on my **Canadian** retirement plans. I certify that I am an "eligible individual" as defined in section 4.01 of Rev. Prov. 2014-55.

I have reviewed my original Form 14654, Certification by U.S. Person Residing in the United States for Streamlined Domestic Offshore Procedures, and the documents I relied upon in preparing my certification. I have recomputed the Highest Account Balance/Asset Value and the Miscellaneous Offshore Penalty for my 3-year covered tax return period and 6-year covered FBAR period by removing the value of my **Canadian** retirement plans as follows:

Line 1. Previously Reported Miscellaneous Offshore Penalty	1
Line 2. Revised Miscellaneous Offshore Penalty	2
Line 3. Requested Refund of Miscellaneous Offshore Penalty (line 1 minus line 2)	3

If your revised Highest Account Balance/Asset Value is for a year different from the Highest Account Balance/Asset Value in your original certification, please note the change below:

Original Highest Account Balance/Asset Value year

Revised Highest Account Balance/Asset Value year

Please identify your Canadian retirement plans below. If you need more space, you may attach additional pages to this form.

Name of Financial Institution	Address of Financial Institution	Account Number	Year-End Balance For Year With Highest Account Balance (State In U.S. Dollars)	

I agree to retain all records (including, but not limited to, account statements) related to my **Canadian** retirement plans and all assets subject to the 5% miscellaneous offshore penalty until six years from the date of this penalty reconsideration request. Upon request, I agree to provide all such records to the Internal Revenue Service.

I agree that any determination made in relation to my penalty reconsideration request is final and may not be appealed.

Under penalties of perjury, I declare that I have examined this penalty reconsideration request and all accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete.

Signature of Taxpayer	Name	Name of Taxpayer		
Signature of Taxpayer (if joint certification)	Name	Name of Taxpayer (if joint certification)		Date
For Estates Only				
Signature of Fiduciary	Date			
Title of Fiduciary (e.g., executor or administrator) Name of Fiduciary				
For Paid Preparer Use Only (the signat	ure of taxpayer(s) or fid	 duciary is required even if this form	is signed b	y a paid preparer)
Signature of Preparer	Name of Pr	Name of Preparer		
Firm's name				Firm's EIN
Firm's address	City	City State		ZIP code
Telephone number	PTIN	PTIN		
Do you want to allow another person to discu	uss this form with the I	RS Yes (complete informat	ion below)	No
Designee's name Telephone			e number	
This document and any attachments must be Internal Revenue Service 3651 South I-H 35 Stop 4305 AUSC Attn: Streamlined Unit Austin, TX 78741	e sent to:		<u> </u>	

Privacy Act and Paperwork Reduction Notice

We ask for the information on this certification by U.S. person residing in the United States for streamlined domestic offshore procedures to carry out the Internal Revenue laws of the United States. Our authority to ask for information is sections 6001, 6109, 7801, 7803 and the regulations thereunder. This information will be used to determine and collect the correct amount of tax under the terms of the streamlined filing compliance program. You are not required to apply for participation in the streamlined filing compliance program. If you choose to apply, however, you are required to provide all the information requested on the streamlined certification. You are not required to provide the information requested on a document that is subject to the Paperwork Reduction Act unless the document displays a valid OMB control number. Books or records relating to a document or its instructions must be retained as long as their contents may become material in the administration of any Internal Revenue law. Generally, tax returns and return information to others as described in the Internal Revenue Code. For example, we may disclose this information to the Department of Justice to enforce the tax laws, both civil and criminal, and to cities, states, the District of Columbia, and U.S. commonwealths or possessions to carry out their tax laws. We may also disclose this information to other countries under a tax treaty, to federal and state agencies to enforce federal nontax criminal laws, or to federal law enforcement and intelligence agencies to combat terrorism. Failure to provide this information may delay or prevent processing your application. Providing false information may subject you to penalties. The time needed to complete and submit the streamlined certification will vary depending on individual circumstances. The estimated average time is: 2 hours