



GRAY REED®

# THE GOVERNMENT CRACKDOWN ON TAX FRAUD ENABLERS

*How Tax Professionals Can Avoid Becoming Criminal Defendants*

*Presented by Tony Box*

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## NIXON'S 1969 PRESIDENTIAL PAPERS TAX DEDUCTION



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TAXES

## IRS Getting Serious About Prosecuting ERC Fraud

The Department of Justice recently arrested a New Jersey tax preparer for allegedly seeking more than \$124 million from the IRS.

Aug. 11, 2023



*From the Kiplinger Consumer News Service (via TNS).*

Employee retention credits have been in the news lately. The Department of Justice recently arrested a New Jersey tax preparer for allegedly seeking more than \$124 million from the IRS. The multi-millions came from filings of over 1,000 false tax

PRESS RELEASE

## Texas Attorney and Client Sentenced for Conspiracy to Defraud the United States and Income Tax Evasion

Wednesday, June 23, 2021

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For Immediate Release

Office of Public Affairs

Texas attorney and former member of the Idaho legislature, John O. Green, and his client, Texas inventor Thomas Selgas, were sentenced yesterday for conspiracy to defraud the United States and tax evasion. Selgas was sentenced to 18 months in prison and Green to six months.

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## Subpoena for Clients Identity? *Taylor Lohmeyer Law Firm v U.S.*



### PRESS RELEASE

## Federal Appellate Court Upholds Enforcement of IRS Summons Seeking Information Concerning Law Firm Clients Involved in Foreign Transactions

Tuesday, April 28, 2020

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For Immediate Release

Office of Public Affairs

WASHINGTON – On April 24, 2020, a federal appellate court upheld an order enforcing an Internal Revenue Service (IRS) summons directed to the Taylor Lohmeyer Law Firm PLLC, the Department of Justice announced. The summons directed the law firm to provide information about clients who used the law firm’s services to create and maintain foreign bank accounts and entities. On appeal, the United States Court of Appeals for the Fifth Circuit upheld the trial court’s enforcement of the summons and rejected the law firm’s “blanket” claim that all responsive materials were protected by the attorney-client privilege. It explained that revealing the fact that the clients participated in specific types of transactions would not necessarily reveal any confidential communication of legal advice protected by the attorney-client privilege.

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## Title search: The Government's Crackdown on Tax Fraud Enablers: How Tax Professionals Can Avoid Becoming Criminal Defendants

Also available as part of the eCourse

[2023 Taxation eConference: Day 2 - Focus on Tax Controversy](#)

First appeared as part of the conference materials for the

71<sup>st</sup> Annual Taxation Conference: Day 2 - Focus on Tax Controversy session

"The Government's Crackdown on Tax Fraud Enablers: How Tax Professionals Can Avoid Becoming Criminal Defendants"