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SECRETARY ROSEMARIE DEVINCENZI



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Hallie is an associate in the private client and tax team.

Hallie dedicates her practice to offshore voluntary disclosure cases. She helps to guide clients through the complex regulatory web designed to ensnare both willful and non-willful taxpayers who have made certain reporting errors pertaining to offshore accounts, assets, pensions, entities and trusts. Hallie helps clients determine the most appropriate voluntary disclosure program for their particular set of circumstances. She advocates strongly and strategically for her clients to help minimize criminal and civil penalty exposure stemming from their intentional or accidental US tax filing errors. Hallie works closely with her clients and their accountants and financial intermediaries to prepare the necessary US tax and informational reporting forms to remedy past filing errors. Hallie also has a background in estate planning and family law, which provides a useful backdrop in advising many of her voluntary disclosure clients.

Track record

Offshore Voluntary Disclosure

Helped two sisters, both Offshore Voluntary Disclosure clients, facing a multimillion dollar (50%) penalty, to achieve a zero penalty result. They were thrilled, as the application of the 50% penalty would have decimated their retirement savings. They are now personal friends, and are enjoying their retirement in a warm, sunny local.

Reduction of tax assessment

Reduced a New York City tax assessment by 50% for a client, by putting forth several out-of-the box arguments for reducing this assessment.

Nonwillful filing errors

Helped numerous clients convey their nonwillful (accidental) filing errors to the IRS in a manner that resulted in a mere 5% penalty in Streamlined Domestic Offshore Procedure cases (and 0% penalty in Streamlined Foreign Offshore Procedure cases).

US tax compliance

Have counselled numerous clients facing criminal penalties and jail time, to come into US tax compliance with tolerable civil penalties.

External publications

'How to Survive an IRS Crypto Tax Audit,' Forkast - November 24, 2021, co-author

'Surviving an IRS Cryptocurrency or Other Crypto Asset Audit,' Bitcoin Magazine - September 27, 2021, co-author

'A Target on American Clients in Canada,' Wealth Professional Canada - April 3, 2020, co-author

'2018 federal and state tax provisions for the foreign service,' The Foreign Service Journal - January - February 2019, contributor

'Its the end of the OVDP world as we know it,' Withers article - March 26, 2018, co-author

'The urgency of FBAR reporting for US persons living in China,' Private Asset Management - August 1, 2016, co-author

'Efficient gifting: Trusts and tax-advantaged accounts are powerful tools for gifting to children,' Financial Advisor Magazine - March 2010, co-author

'Let's start with gifting - Annual Exclusions,' Private Wealth Magazine - March/April Edition 2010, co-author

'FLP care and maintenance,' Financial Advisor Magazine - December 2008, co-author

Admissions

New York, 2007

Maryland, 2005

Connecticut, 2007

Education

Georgetown University Law Center, Washington, DC, LLM, Taxation

University of Baltimore School of Law, Baltimore, MD, Juris Doctor

Emory University, Goizuetta Business School, Atlanta, GA, Bachelor of Business Administration

Languages

English

Key dates

Year joined: 2007

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