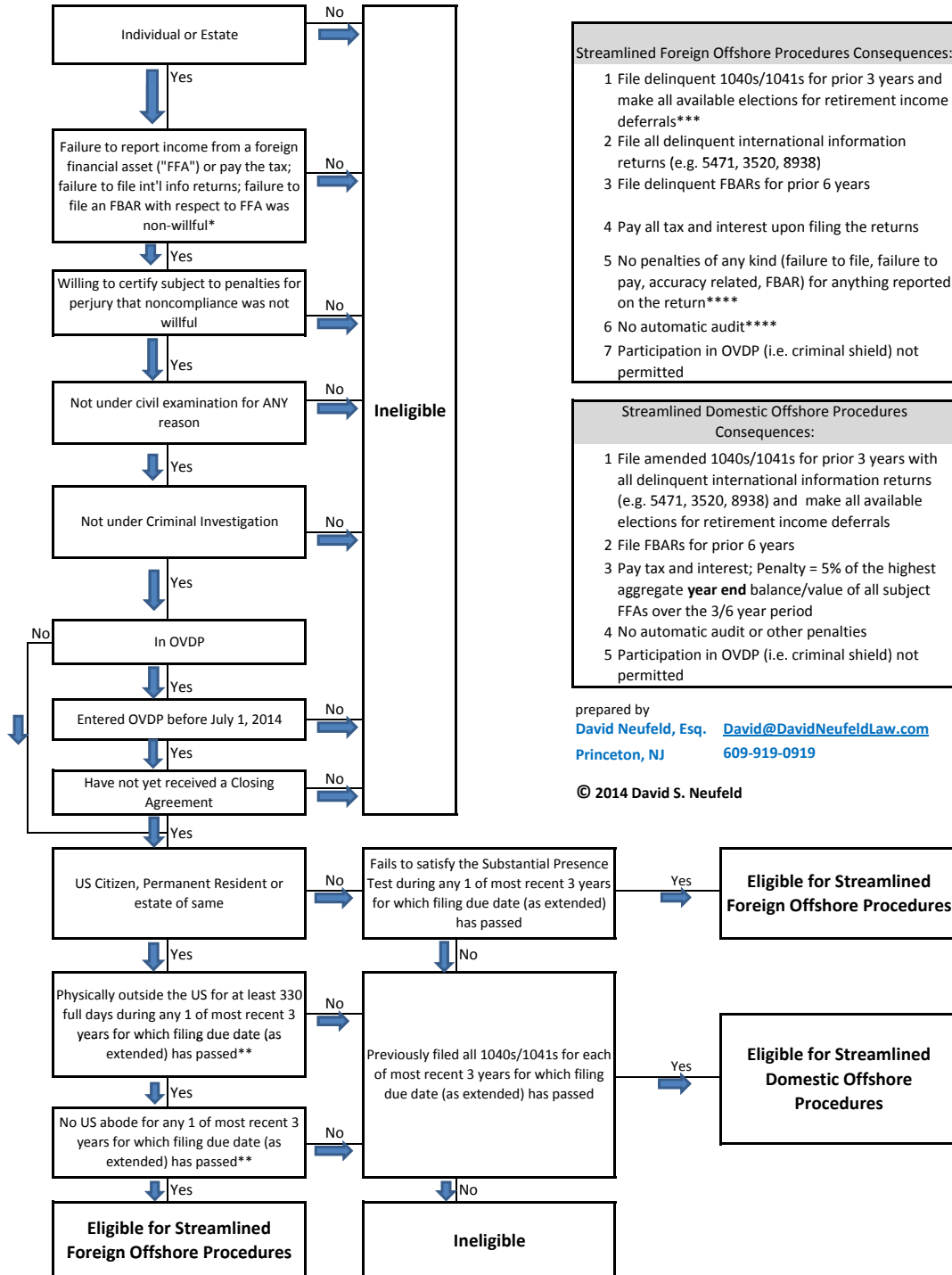


2014 Streamlined Offshore Filing Program Eligibility



* Negligence, inadvertance or mistake, good faith misunderstanding of the law

** These are the non-residence requirements, which must operate for both spouses if joint filers. The rules under section 911 are invoked for some parts of this rule but not others. (1) It is not clear if this 330 day rule is the same as the 330 days out of the rolling 365 day period under section 911 or a new rule that is strictly within a calendar year; it appears to be the latter. (2) This rule focuses on days outside the US whereas section 911 refers to days in a foreign country; not the same thing. (3) The definition of "abode" in the section 911 regs are specifically invoked; temporary presence in the US and maintenance of a dwelling in the US do not necessarily mean the abode is in the US.

*** Reference to "prior 3 years" or "prior 6 years" means the three or six years immediately preceding for which the filing deadlines as extended have expired. That means if the due date for the immediately preceding year is still open the operative period leapfrogs back to the year before that one.

**** There may still be an audit in due course under normal procedures and penalties assessed for other items; also if the original return was fraudulent or the FBAR non-compliance willful.