

Date: [Insert Date]

To: [Insert Client Name]
[Insert Client Address]

Subject: Advisory Regarding Voluntary Disclosure and Repatriation Risks

Dear [Insert Client Name],

This letter serves to formally advise you regarding the legal and financial implications of voluntary disclosure and the repatriation of offshore assets to [Insert Country Name].

1. Purpose of Voluntary Disclosure

The primary objective of a voluntary disclosure is to normalize your tax status and rectify previous non-compliance regarding undeclared foreign income or assets. By proactively disclosing these interests, you may qualify for a reduction in administrative penalties and immunity from criminal prosecution related to tax evasion.

2. Identification of Repatriation Risks

The process of bringing funds back into the local jurisdiction involves several risk factors that must be managed:

- **Tax Liabilities:** Assessment of back-taxes, interest, and specific repatriation levies.
- **Regulatory Scrutiny:** Enhanced "Know Your Customer" (KYC) and Anti-Money Laundering (AML) checks by financial institutions.
- **Exchange Rate Volatility:** Potential financial loss during the conversion of foreign currency.
- **Legal Sufficiency:** The requirement to provide comprehensive documentation regarding the original source of funds.

3. Disclosure Requirements

To proceed, you are required to provide a full and honest account of all global assets. Any material omission or misrepresentation during the disclosure process can void the protections offered by the tax authorities and lead to severe legal consequences.

4. Confidentiality and Legal Privilege

Information shared with this firm regarding your offshore holdings is protected by professional confidentiality. However, once a formal filing is made to the tax authorities, that information becomes a matter of record with the government.

5. Recommendation

We recommend a comprehensive audit of your foreign accounts prior to the submission of any formal disclosure documents to ensure accuracy and to mitigate the risks outlined above.

Please sign below to acknowledge that you have read and understood the risks associated with voluntary disclosure and asset repatriation.

Sincerely,

[Insert Name/Signature]

[Insert Title]

[Insert Firm Name]

Acknowledgment:

[Insert Client Name]

Date: _____