

FICTIONAL WRITTEN PLAN

Missed Account Reporting: Action Plan

Missed account reporting - facts and next steps

Selected year: 2023 (D1 p. 1; D2 p. 1; D3 pp. 1-3)
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Accepted question

For 2023 Alex Example Bank C personal deposit account, compare the supplied FBAR copy and acknowledgment with the account inventory, opening record, and December statement, identify documented differences and unresolved facts, and provide the next records/review steps.

Fictional sample - not a client deliverable

All people, banks, file names, page references, and figures are fictional. No underlying documents were reviewed, and this sample does not represent Chip's signoff.

Filing history and evidence

Known filing history

- For 2023, the packet contains one FBAR copy and one acknowledgment with a matching reference. (D3 pp. 1-3; D4 p. 1)
- The supplied copy lists two other banks; no Bank C entry appears in it. (D3 pp. 1-3)
- No supplied return evidence and no established amendment history; other years are outside the accepted scope. (D1-D6, evidence index)
- Missing documents are recorded as unknown, not treated as proof that a filing did not occur. (D1-D6, evidence index)

Evidence index

ID / record / pages	Use and limitation
D1 · p. 1 intake-organizer.pdf	Client-reported ownership, history, and screening facts; not bank or filing evidence.
D2 · p. 1 account-inventory.pdf	Current reconstruction lists Bank C for 2023; not proof of a complete account population.
D3 · p. 1-3 filed-fbar.pdf	Supplied 2023 report copy lists Bank A and Bank B, not Bank C; reference SAMPLE-R23. No independent filing-system retrieval.
D4 · p. 1 acknowledgment.pdf	Dated May 20, 2024; reference SAMPLE-R23 matches D3. Supports a submission-history link, not report accuracy or completeness.
D5 · p. 1 opening.pdf	Bank C deposit account, named holder Alex Example, Ecuador, USD; recorded opening May 15, 2023.
D6 · p. 1-2 december-statement.pdf	December 1-31, 2023 only. Closing balance on p. 1; interest entry on p. 2. Earlier values and interest period unconfirmed.

Evidence coverage

- Six illustrative files, eight substantive pages plus a one-page organizer. (D1 p. 1 organizer; D2 p. 1; D3 pp. 1-3; D4 p. 1; D5 p. 1; D6 pp. 1-2)
- No income-tax return pages, annual interest certificate, full-period statements, or closure records are included. (D1-D6, evidence index)
- A filing acknowledgment can support submission history but must not be treated as proof of every reported account or value without the corresponding report evidence. (D3 pp. 1-3; D4 p. 1)

Account inventory

Source IDs refer to the evidence index on page 2. The figure below is a dated observation.

Year / account / country	2023 / Bank C deposit / Ecuador (D2 p. 1; D5 p. 1)	
Ownership evidence	D5 p. 1 names Alex Example; D1 p. 1 reports sole personal ownership. Other holders or authority arrangements require confirmation.	
Open / close dates	Opened May 15, 2023 per D5 p. 1. No closure date is established by the packet.	
Records covered	Opening record and December 1-31 statement; intervening balance coverage is missing.	
Observed balance / currency	USD 5,800 at December 31, 2023 (D6 p. 1)	
Annual maximum status	Observed balance only - annual maximum unresolved	
Prior filing / reference	Supplied 2023 FBAR D3; D4 shares SAMPLE-R23. Bank C absent from D3. No amendment history established.	
Source / page	D5 p. 1; D6 p. 1-2; D3 pp. 1-3; D4 p. 1	
Gap	No suitable maximum-value evidence for May 15-December 31; interest period unconfirmed.	
Next action	Request opening-to-year-end statements or suitable maximum-value evidence and annual interest records.	
Evidence status	Client-confirmed fact	

Observed balance is not a verified annual maximum.

This workpaper organizes documented facts; it does not decide a filing obligation, relief eligibility, or a correction route.

Document comparison workpaper

1. Bank C was held in 2023.

Filed-return evidence	Account-document evidence
Bank C is absent from D3.	D5 p. 1 names Alex Example; opening May 15, 2023.
Discrepancy	Clarification
Opening and named-holder facts supported; ownership arrangements unverified.	Confirm all holders, beneficial ownership, and authority.

Reviewer status: Extracted fact

2. Bank C was left out of the supplied report.

Filed-return evidence	Account-document evidence
D3 pp. 1-3 list Bank A and Bank B; D4 p. 1 reference matches D3.	D2 p. 1 lists Bank C; D5 p. 1 identifies it.
Discrepancy	Clarification
Bank C absent from this copy; a matching reference does not authenticate contents.	Confirm the complete copy and identify any later amendments or replacement filings.

Reviewer status: Unresolved fact

3. Is USD 5,800 the annual maximum?

Filed-return evidence	Account-document evidence
No Bank C value in D3; no other Bank C filing supplied.	D6 p. 1: USD 5,800 closing balance, December 31.
Discrepancy	Clarification
Closing balance observed; annual maximum unresolved.	Obtain suitable May 15-year-end value evidence. Calculation needs an agreed scope.

Reviewer status: Unresolved fact

4. Does USD 220 settle interest reporting?

Filed-return evidence	Account-document evidence
No Form 1040 or related schedules supplied.	D6 p. 2: USD 220 interest entry; period and type unclear.
Discrepancy	Clarification
Annual interest and U.S. return treatment unresolved.	Clarify the period and obtain annual interest records and relevant return pages for separate review.

Reviewer status: Unresolved fact

Next records and review steps

Missing-record requests

- Opening-to-year-end statements or other suitable maximum-value evidence for Bank C (May 15-December 31, 2023). (D5 p. 1; D6 pp. 1-2)
- The complete supplied 2023 FBAR copy and any later amendment or replacement filing reference. (D3 pp. 1-3; D4 p. 1)
- Annual interest evidence and the relevant federal return schedules for a separately agreed review. (D6 p. 2; D1-D6, evidence index)
- Confirmation of all account holders, beneficial ownership, and any authority arrangements. (D1 p. 1; D5 p. 1)

Relevant U.S. reporting questions

- What evidence is needed to assess Bank C reporting and the relevant aggregate account values?
- Do any ownership or authority exceptions require further factual development?
- Does a separate Form 8938 or income-reporting review need to be scoped?
- Which preparation work, if any, should be accepted after those facts are established?

Ordered next steps

1. Confirm ownership, authority, and whether any other accounts were omitted for 2023. (D1 p. 1; D2 p. 1; D5 p. 1)
2. Request the missing Bank C value evidence and annual interest records from the bank. (D6 pp. 1-2)
3. Record the source comparison; do not select a relief route or certify a correction route. (D2 p. 1; D3 pp. 1-3; D5 p. 1)
4. Decide whether separately scoped preparation or a credentialed-representative review is needed. (D1-D6, evidence index)

Limitations

- Covers one person, one year, and one selected account. Bank A and Bank B are report context only. (D1 p. 1; D2 p. 1; D3 pp. 1-3; D5 p. 1)
- No filing, full-year balance reconstruction, return review, relief-eligibility decision, penalty assessment, or legal-conduct opinion.
- Does not establish the correct amended amount, relief eligibility, or a filing route.
- No agency contact or disputed ownership was reported in the fictional intake; those statements were not independently verified. (D1 p. 1)