

2025 Ethics Part 3 – Conflicts of Interest, Maintaining Client Confidentiality and Managing Conduct to Avoid Penalties

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Agenda and Objectives

- Discussion of §10.29 Conflict of Interest and the importance of identifying the conflict
- Confidentiality is the law – understanding the laws related to keeping your client's information confidential
- Understanding the issue of penalties under § 7216



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§10.29 Conflict of Interest – Often Missed or Miss Understood



- § 10.29 remains unchanged in the proposed regulations –Reg-116610-20
- It is often an area which is missed when dealing with clients
- There are 4 main types of conflict of interest, they include:
 - Romantic or relational
 - **Financial**
 - Competitive
 - **Confidential**

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How to Approach?



- A useful approach to such issues is the 4Ds:
 - Disclose
 - Distance
 - Delegate and
 - Disassociate
- The true test of verifying whether a matter is just a potentially perceived conflict of interest, or an actual conflict of interest, is disclosure
- When it comes to conflicts of interest, appearance is as important as reality
- This is why disclosing conflicts of interest is important

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§ 10.29 of Circular 230



- §10.29(a) Except as provided by paragraph (b) of this section, a practitioner shall not represent a client before the Internal Revenue Service if the representation involves a conflict of interest
- A conflict of interest exists if:
 - (1) The representation of one client will be directly adverse to another client; or
 - (2) There is a significant risk that the representation of one or more clients will be materially limited by the practitioner's responsibilities to another client, a former client or a third person, or by a personal interest of the practitioner

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§ 10.29 of Circular 230



- 10.29(b)
- Notwithstanding the existence of a conflict of interest under paragraph (a) of this section, the practitioner may represent a client if
 - (1) The practitioner reasonably believes that the practitioner will be able to provide competent and diligent representation to each affected client;
 - (2) The representation is not prohibited by law; and
 - (3) Each affected client waives the conflict of interest and gives informed consent, confirmed in writing by each affected client, at the time the existence of the conflict of interest is known by the practitioner

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§ 10.29 of Circular 230



- 10.29(b)
- The confirmation may be made within a reasonable period of time after the informed consent, but in no event later than 30 days
- 10.29(c)
- Copies of the written consents must be retained by the practitioner for at least 36 months from the date of the conclusion of the representation of the affected clients, and the written consents must be provided to any officer or employee of the Internal Revenue Service on request

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Conflict of Interest Form



- A conflict-of-interest form is a document where individuals disclose potential conflicts of interest between their personal or financial interests and their professional or organizational responsibilities
- It is used to ensure transparency and prevent situations where someone's personal interests might unfairly influence their decisions or actions
- Several sample can be found online

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What is OPR's Position on Conflict of Interest?



- A practitioner can avoid a conflict of interest by identifying a potential conflict before it arises
- When a prospective or current client consults with a practitioner about engaging the practitioner to represent the person before the IRS in a new or additional matter, the practitioner should assess whether the representation is likely to be directly adverse to the practitioner's representation of another client
- If so, the practitioner may decide to decline the representation
- In the same situation, if the practitioner determines that accepting the representation would likely pose a significant risk that the practitioner would be materially limited in effectively representing the client because of responsibilities to another client, for example, the practitioner should avoid the conflict by declining the representation or otherwise resolving the probable conflict

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What is OPR's Position on Conflict of Interest?



- Alternatives to declining representation can include:
 - Withdrawing from the representation of the other client to accept a new representation when withdrawal is not premature
 - The withdrawal would not harm the other client, and is appropriately handled (withdrawing from representation in a court case, for instance, may require the court's permission)

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The Official Definition – One of Many



- **Conflicts of interest** are a clash that most often occurs between requirements and interests
- Various types of conflicts of interest can occur because of the nature of relationships versus rules of organizations or federal and state laws
- People can easily become biased (have an unfair preference) because of small things like friendship, food, or flattery, or they may be influenced to make a decision because of the potential to gain power, prestige, or money
- Conflicts can occur when an individual makes or influences a decision and does so for some personal gain that may be unfair, unethical, or even illegal

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The Official Definition – One of many



- The important part is **what you do in each of those situations**
- Do you allow your family, friendship, financial, or inside knowledge affect your actions?
- If you do, you could be violating a federal or state statute or a policy
- Again, you must be able to identify so you can:
 - Disclose
 - Distance
 - Delegate and
 - Disassociate
- As needed

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Disclosure



- Disclosure is typically a more formal and documented process that most organizations have adopted in policy to address conflicts of interest
- The disclosure process is intended to help the work force be transparent and accountable for (explain or justify) their actions and decisions
- Disclosure of a potential conflict of interest does not make it an actual conflict, but may help eliminate the perception
- On the other hand, disclosure of an actual conflict of interest does not remove the conflict, but helps get it in the open to be properly addressed

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Disclosure



- It's important to disclose both potentially perceived and actual conflicts of interest to allow others to evaluate the matter and make the decision, rather than keep it to oneself and then create an ethical or legal situation
- The individual cannot make the determination as to whether it is a conflict or not because he or she does not have an independent or objective point of view
- When you identify a situation that may be a conflict, or could be perceived as a conflict, action needs to take place

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Distance Yourself From the Conflict



- Sometimes a practitioner may be able to avoid a conflict posed by the practitioner's responsibilities to a third person by ending or temporarily suspending the practitioner's relationship to the third person
- This may be achievable for a fiduciary relationship (e.g., the practitioner recuses herself/himself as the trustee of a trust and an alternate trustee assumes control of the trust)
- The same can apply to a positional relationship (e.g., the practitioner is an uncompensated officer of a charitable organization who resigns from the position to avoid a conflict if the practitioner takes on the representation)

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Delegate or Disassociate



- When obligations to a former client raise a high risk that representation of a current client would be materially impaired, avoiding the conflict may be very difficult or impossible, especially if the practitioner has confidential information about the former client that would advance the current client's interests in the represented matter
- One possible way to avoid such a conflict is to limit, at the outset, the scope of the representation, so that the practitioner will represent the new client only for tax matters that do not overlap with matters handled for the former client
- When the practitioner who would be conflicted out of the representation is a member of a firm of other practitioners, another possibility is for another member of the firm to represent the client before the IRS, with appropriate protective measures, including fully screening the first practitioner off from any involvement in the representation

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Polling Question #1



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IRS Definition of Conflict of Interest



- Circular 230, the Treasury regulations governing ethical standards applicable to practice before the IRS, deals with conflicting interests at § 10.29 (31 C.F.R. §10.29)
- It forbids federal tax practitioners from having conflicts of interest, defined as representation of one client that is directly adverse to that of another client, or representing a client in circumstances creating a significant risk that the representation of one or more clients will be materially limited by the practitioner's responsibilities to another client, a former client, or a third person or by a personal interest of the practitioner
- However, a practitioner may represent a client despite a conflict of interest if the practitioner reasonably believes he or she can provide competent and diligent representation to each affected client and if all affected clients waive the conflict by giving their written informed consent

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IRS Definition of Conflict of Interest



- Circular 230 has at least two major potential effects on covered practitioners:
 - (1) Violation of a Circular 230 standard may subject the practitioner to sanction by the IRS Office of Professional Responsibility (OPR); and
 - (2) Circular 230 may be used in a lawsuit for damages filed by a client in connection with asserted errors and omissions by the practitioner as the standard to which the practitioner should be held in performing services
- Thus, tax practitioners have a strong interest in understanding the standards to which they will be held under Circular 230

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Changes in IRS Definition



- The original version of § 10.29 (essentially unchanged since before 1976) was a simple three-line prohibition against representing clients with conflicting interests except by express consent of all directly interested parties after full disclosure
- In 2002, § 10.29 was amended to its current form, with additional enhancements in 2007 that included requiring that a known conflict of interest may be waived only by the informed consent of each affected client, confirmed in writing by the client

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Changes in IRS Definition



- However, the preambles to the final regulations in 2002 (T.D. 9011) and again in 2007 (T.D. 9359) made clear Treasury's intent to strengthen the language of § 10.29 and to modify it to conform more closely with Model Rule 1.7 of the American Bar Association Model Rules of Professional Conduct
- The preamble to T.D. 9359 in 2007 stated that § 10.29 as amended was broader than the ABA model rule (by, for example, requiring client confirmation in writing)

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When Does § 10.29 Apply?



- The rules of § 10.29 apply only where the preparer is **acting as a practitioner** as defined in Circular 230
- Thus, for example, if a practitioner is an expert witness in a state law trial dealing with federal tax issues, he or she is not acting as a practitioner as defined in Circular 230
- However, the AICPA Code of Professional Conduct and other AICPA and state professional standards may still apply to such testimony
- Thus, if § 10.29 provides a stricter rule on the definition of conflict of interest and how to deal with such a conflict in the context of acting as a practitioner (as defined in Circular 230), a preparer should follow § 10.29
- However, he or she should in all events follow the AICPA professional standards as a minimum standard

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AICPA Definition



- Under the AICPA professional standards, a CPA is required to maintain objectivity and integrity, be free of conflicts of interests, and not knowingly misrepresent facts or subordinate his or her judgment to others
- These requirements are not inconsistent with any provision of Circular 230
- These ethical standards also inherently underlie § 10.29
- Tax practitioners employed by others to perform tax services are charged with the same responsibility of objectivity under the AICPA standards as CPAs in public practice
- **Integrity, objectivity, and independent judgment** are essential elements in a practitioner (CPA) relationship with a client or employer in a federal tax practice and in his or her status as a practitioner under Circular 230

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AICPA Definition



- The AICPA Code of Professional Conduct differentiates between objectivity and independence
- ET § 55.03 provides that, for a CPA in public practice, maintaining objectivity and independence requires a **continuing assessment of client relationships and public responsibility**
- A CPA who provides auditing and other attestation services should be independent in **fact and appearance**
- However, this standard does not apply to a practitioner under Circular 230 in the absence of any attestation service performed by a CPA or his or her firm for a client

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AICPA Definition



- Thus, CPAs providing such attestation services should consider
- (1) whether such engagement may materially limit the ability of such CPAs and their firms to provide federal tax advocacy services for the client under § 10.29(a)(2), and
- (2) whether there is a significant risk that the representation of the client in federal tax advocacy matters will be materially limited by the personal interest of the practitioner or his or her firm due to the independence requirement of the attest engagement
- In such cases, the CPA would need to follow the procedures under § 10.29 regarding consent to waive such conflict (assuming the tax engagement could be managed so as to not violate the independence requirements)

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Potential Conflicts



- § 10.29 refers not only to actual conflicts but to situations where there is significant risk that representation of one or more clients will be materially limited
- Thus, the potential for conflicts must be considered in appropriate situations
- If a conflict of interest may exist or may be likely to develop before an engagement is undertaken, the engagement must be declined unless the practitioner obtains the informed consent of each client under the conditions set forth under §10.29(b)
- To determine whether a conflict of interest may exist or is likely to develop, a practitioner should adopt reasonable procedures appropriate for the size and type of firm and practice and determine the persons and issues involved

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Potential Conflicts



- Unforeseeable developments such as a change in corporate or other organizational affiliations or in personal relationships (such as divorce, pending divorce, or conflict between spouses) may cause a conflict during an engagement
- A practitioner may also become aware of facts that alert (or should alert) him or her to a conflict of interest
- Depending on the circumstances, the practitioner may have the option or requirement to withdraw from one of the engagements to avoid the conflict
- The practitioner must continue to protect the confidences of the client from whose representation he or she has withdrawn

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Identifying Adverse Conflicts



- One example is spouses who are jointly liable with respect to a tax liability, but one spouse may have defenses to the detriment of the other spouse (such as the innocent spouse defense)
- It would be difficult if not impossible for the practitioner to represent both spouses in such a situation because their interests are directly adverse to each other in a conflict for which consent probably cannot be waived
- In such a case, the practitioner may not ask both spouses to consent to common representation
- Similarly, with divorcing spouses, you should carefully consider whether a conflict is consentable and whether drafting appropriate disclosures is appropriate

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Identifying Adverse Conflicts

- For example, a practitioner is asked to represent the seller of a business in negotiations with the buyer, who is also a client
- The practitioner could not undertake the engagement without the written informed consent of each client, and even then would do so at significant risk should the transaction turn sour
- Outside a federal tax engagement, however, this may not be the case (compare AICPA Consulting Services Special Report 93-2, Conflicts of Interest in Litigation Services Engagements §110.17)
- Simultaneous representation of clients in unrelated matters where those clients' interests are only economically adverse does not ordinarily constitute a conflict of interest and thus may not require consent
- But caution should be considered

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Polling Question #2

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Consent to Waiver



- As indicated in § 10.29(b), clients may not consent to some conflicts
- This means the practitioner cannot properly ask for such an agreement or provide representation on the basis of the client's consent
- When the practitioner is representing more than one client, the question of consent must be resolved for each client
- The clients' ability to consent is typically determined by considering whether their interests will be adequately protected if they give their informed consent to a representation burdened by a conflict of interest
- Thus, representation is prohibited if, under the circumstances, the practitioner cannot reasonably conclude that he or she will be available to provide competent and diligent representation

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Consent to Waiver



Considerations include:

- (1) possible effects on integrity and objectivity
- (2) the § 7525 practitioner-client privilege and confidentiality requirements under ET Section 301, and
- (3) the advantages and risks involved in the common representation

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Obtaining and Recording Consent

- § 10.29(b) requires the practitioner to obtain the written informed consent of each client confirmed at the time that the practitioner knows of the existence of a conflict of interest
- Written confirmation may be made within a reasonable period after the informed consent, but no later than 30 days after
- § 10.29(c) requires practitioners to retain copies of written consents for at least 36 months after the date of the conclusion of the representation of the affected clients, and the written consents must be provided to any IRS officer or employee on request
- A client who has given consent to a conflict may revoke that consent and may terminate the representation at any time

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Confidentiality

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Confidentiality in Multiparty Representations



- In any multiparty representation, a practitioner must consider, in addition to the above-stated standards and values, the confidentiality requirement under ET § 301, as well as the practitioner-client communication privilege under IRC § 7525
- § 7525: Uniform application to taxpayer communications with federally authorized practitioners
- **THE GENERAL RULE UNDER § 7525**
- With respect tax advice, the same common law protections of confidentiality which apply to a communication between a taxpayer and an attorney shall also apply to a communication between a taxpayer and any [federally authorized tax practitioner](#) to the extent the communication would be considered a privileged communication if it were between a taxpayer and an attorney

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ET § 301



- The AICPA's recently revised code includes the same basic rule on client confidentiality, but it greatly expands the interpretations under the rule
- The revised AICPA code went into effect in December 15, 2014
- Former Rule 301 stated that “a member in public practice shall not disclose any confidential client information without the specific consent of the client,” but the rule did not state the method by which consent was to be obtained
- However, Rule 391, Ethics Rulings on Responsibilities to Clients, suggests that the consent be in writing – aligning with Circular 230

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§ 10.29 of Circular 230



- Provides that the conflict be addressed
- A waiver provided if acceptable
- The waiver must be in writing
- The confirmation may be made within a reasonable period of time after the informed consent, but in no event later than 30 days
- The document must be kept for 36 months and available to IRS when requested

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Confidentiality in Multiparty Representations



- Normally, a practitioner's client have a more limited right to confidentiality than under the attorney-client communication privilege, but that right is still of great significance
- Commencing or continuing common representation would almost certainly be inappropriate if one client asks the practitioner to not disclose to the other client information relevant to the common representation
- The practitioner must act with **integrity and objectivity** with respect to each client equally; each client has a right to be informed of anything bearing on the representation that might affect the client's interests and the right to expect that the practitioner will use that information to the client's benefit

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Confidentiality in Multiparty Representations



- Therefore, in any consent to a waiver of conflict as required in § 10.29, suspension of a client's rights to confidentiality under ET § 301 and § 7525 must be **anticipated and provided for** with respect to the other client being commonly represented

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Confidentiality



- The Taxpayer Bill of Rights (TBOR) is a cornerstone document that highlights the 10 fundamental rights taxpayers have when dealing with the Internal Revenue Service (IRS)
- The IRS wants every taxpayer to be aware of these rights in the event they need to work with the IRS on a personal tax matter
- IRS [Publication 1, Your Rights as a Taxpayer](#), includes a full list of taxpayers' rights
- It includes **The Right to Confidentiality**
- Taxpayers have the right to expect that any information they provide to the IRS will not be disclosed unless authorized by the taxpayer or by law
- Taxpayers have the right to expect appropriate action will be taken against employees, return preparers, and others who wrongfully use or disclose taxpayer return information

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Confidentiality



- What a taxpayer can expect:
 - In general, the IRS may not disclose the client's tax information to third parties unless the client gives IRS permission
 - In general, the IRS cannot contact third parties such as an employer, neighbors or bank, to get information to adjust or collect the tax the client owe unless it gives the client reasonable notice in advance
 - **301.7602-2, Third party contacts, (26 CFR 301.7602-2) impose three obligations on the IRS regarding these contacts:**
 - Provide the taxpayer advance notice of the intent to make third-party contacts
 - Record each third party contacted and
 - Provide a list of third parties contacted to the taxpayer upon request

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Confidentiality



- Generally, the IRS must send the notice at least 45 days before making the taxpayer contact
- IRC § 7602(c)(3) waives the TPC notice requirement if :
 - (i) the taxpayer has authorized the contact
 - (ii) the IRS determines for good cause that notice would jeopardize the IRS's tax collection efforts or may involve reprisal against any person or
 - (iii) the contact is made in connection with a criminal investigation
- No law expressly requires the IRS to let the taxpayer know what specific information it needs (or needs to verify) before contacting third parties

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Accountant-Client Privilege



- Throughout the United States, there is generally no formal accountant-client privilege
- States have varying laws respecting the rules of confidentiality between accountant and client, and the AICPA has rules requiring confidentiality between accountant and client
- Without a formal general privilege rule, however, it may be more difficult for a client to assert that communications or documents are protected from disclosure

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Federally Authorized Tax Practitioner Privilege



- The absence of a formal accountant-client privilege was one of the catalysts to enactment in 1998 of the federally authorized tax practitioner privilege codified in § 7525
- Congress intended that the “provision extends the attorney-client privilege of confidentiality to tax advice that is furnished to a client-taxpayer (or potential client-taxpayer) by any individual who is authorized under Federal law to practice before the IRS” under Treasury Circular 230, *Regulations Governing Practice Before the Internal Revenue Service* (31 C.F.R. Part 10)

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Federally Authorized Tax Practitioner Privilege



- This includes attorneys, CPAs, enrolled agents, and enrolled actuaries ([Joint Committee on Taxation, General Explanation of Tax Legislation Enacted in 1998 \(JCS-6-98\), p. 87 \(Nov. 24, 1998\)](#))
- The federally authorized tax practitioner privilege extends the attorney-client privilege to consultations with other federally authorized tax practitioners in federal tax matters — with limitations

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Federally Authorized Tax Practitioner Privilege



- The federally authorized tax practitioner privilege may only be asserted in civil (noncriminal) tax proceedings before the IRS or a tax proceeding in federal court brought by or against the United States
- In criminal cases, where an attorney is consulted, the attorney-client privilege generally would apply
- The limitation also prevents the privilege from being asserted before any regulatory body other than the IRS
- For example, in matters before the SEC, the federally authorized tax practitioner privilege does not apply

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Federally Authorized Tax Practitioner Privilege



- The federally authorized tax practitioner privilege also does not apply to any communication between a federally authorized tax practitioner and any person, director, officer, employee, agent, or representative of the person, or any other person holding a capital or profits interest in connection with the promotion of the direct or indirect participation in any tax shelter as defined in [§. 6662\(d\)\(2\)\(C\)\(ii\) \(§ 7525\(b\)\)](#)
- Similar to the attorney-client privilege, the privilege under § 7525 can be waived when a taxpayer or federally authorized tax practitioner discloses to a third-party confidential communications otherwise protected under the privilege

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Penalties



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Disciplinary Actions



- IRC § 7216 and its lengthy regulations govern when a tax return preparer may disclose or use a taxpayer's tax return information without first obtaining the taxpayer's consent
- Because it is a federal crime to violate § 7216 and its regulations, practitioners should familiarize themselves with these provisions

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Disciplinary Actions



- IRC § 7216 and its regulations are set up as a blanket prohibition on a preparer's disclosure or use of a taxpayer's return information without the taxpayer's prior consent
- [Treasury Regulations § 301.7216-2](#), however, provides for numerous exceptions to this rule
- For disclosures or uses not permitted there under, IRC § 7216 makes it a crime for a tax return preparer to knowingly or recklessly—
 - disclose any information furnished to the tax return preparer in connection with preparing a client's tax return, or
 - use tax return information other than to prepare or assist in preparing a client's tax return

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Disciplinary Actions



- In addition, civil monetary penalties may be imposed under IRC § 6713
- Willful unauthorized disclosure of tax return information may also subject a preparer to discipline under Treasury Department Circular 230 or subject a CPA to discipline by the AICPA
- **§ 6713(a) Imposition of Penalty** — If any person who is engaged in the business of preparing, or providing services in connection with the preparation of, returns of tax imposed by chapter 1, or any person who for compensation prepares any such return for any other person, and who--

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Disciplinary Actions



- In addition, civil monetary penalties may be imposed under IRC § 6713
- Willful unauthorized disclosure of tax return information may also subject a preparer to discipline under Treasury Department Circular 230 or subject a CPA to discipline by the AICPA
- **§ 6713(a)(1)** discloses any information furnished to him for, or in connection with, the preparation of any such return, or
- **§ 6713(a)(2)** — uses any such information for any purpose other than to prepare, or assist in preparing, any such return, shall pay a penalty of \$250 for each such disclosure or use, but the total amount imposed under this subsection on such a person for any calendar year shall not exceed \$10,000

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Integrity, Due Diligence and Professional Judgment



- All come into play when representing, preparing, communicating and engaging confidentiality of the client
 - **Integrity** - the quality of being honest and having strong moral principles; moral uprightness
 - **Representing** - be entitled or appointed to act or speak for (someone), especially in an official capacity
 - **Communicating** - share or exchange information, news, or ideas, in our context tax information/tax law
 - **Confidentiality**- the state of keeping or being kept secret or private
 - **Due Diligence** - reasonable steps taken by a person in order to satisfy a legal requirement, specifically a tax return
 - **Judgment** - the ability to make considered decisions or come to sensible conclusions - the mental or intellectual process of forming an opinion or making a decision

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Summary



- Conflicts of Interest need to be identified as early as possible
- Confidentiality is the law
- IRS and other organizations provide guidance and penalties for failure to comply with both provisions
- Both areas can result in a referral to the Office of Professional Responsibility
- The Office of Professional Responsibilities: OPR's vision, mission, strategic goals and objectives support effective tax administration by ensuring all tax practitioners, tax preparers, and other third parties in the tax system adhere to professional standards and follow the law

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Polling Question #3



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Questions?



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Upcoming Webinars

- Ethics: Part 4 (12/18) – 2:30pm-3:30pm ET – Maitre

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