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(4) IRM 4.25.4.4(3)(c) is a new paragraph that explains the referral process for potential Form 8938 penalties. (5) IRM 4.25.4.4.1, Foreign Account Tax Compliance Act (FATCA) contains

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1. The Collapse of the Soviet Union and end of the Cold War. a. Mikhail Gorbachev became leader of the Soviet Union in 1985. \*Gorbachev supported glasnost (openness in discussing social problems) \*He also supported perestroika (restructuring of the economic system) b. His support led to ownership of private land, more free speech and free elections.

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foreign relations and intercourse; ... chapter 6—foreign diplomatic and consular officers ( § § 251 – 259) chapter 7—international bureaus, congresses, etc. ( § § 261 – 290q) ... chapter 25—protection of vessels on the high seas and in territorial waters of foreign countries ( § § 1971 – 1980b)

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