

**AGREEMENT WITH RESPECT TO DISCLOSURE IN COMPLIANCE WITH
ANNOUNCEMENT 2002-2**

This agreement confirms that the Internal Revenue Service will not assert that **[Taxpayer's]** production of the documents listed below constitutes a subject matter waiver of the attorney-client privilege or the work product doctrine with respect to other documents addressing the same subject matters as those discussed in the listed documents.

This agreement does not constitute a concession by the Service that the documents are subject to protection by the attorney-client privilege or the work product doctrine. This agreement is not intended to limit in any way the Service's right to contest any privilege claims that **[Taxpayer]** may assert with respect to any other documents.

In accordance with this agreement, unredacted copies of the documents will be provided to the Service.

LIST OF DOCUMENTS TO BE PRODUCED:

Commissioner of Internal Revenue

Taxpayer:_____

TIN#:_____

By:_____

By:_____

Date:_____

Date:_____