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Brager Tax Law Group

May 2013

ABA Webinar: Administrative Tax Strategies & Techniques in a Recessionary Economy

Dear Dennis,

I'll be speaking at an American Bar Association Section of Taxation webinar on "Administrative Tax Strategies and Techniques in a Recessionary Economy."

I'll be discussing strategies and recent developments regarding:

- IRS-enforced collection efforts
- Collection due process proceedings
- Bankruptcy as a collection alternative
- Innocent spouse relief
- Freedom of Information Act (FOIA) requests

The webinar is on Tuesday, May 21st from 9:00 AM to 10:30 AM PT. This educational program is for 1.5 CLE credits.

For more information <u>click here</u> or copy and paste the link below into your browser:

http://apps.americanbar.org/cle/programs
/t13ats1.html?sc_cid=CET3ATS-B

If you have any questions about these topics or any other tax controversy matters, please contact me.



Dennis N. Brager, Esq.

Former IRS Senior Trial Attorney Nationally Recognized California State Bar Certified Tax Specialist



Upcoming Events

Dennis will at the speaking the following upcoming conferences.

State Bar Small & Solo Firm Summit

"Innocent Spouse" Long Beach, CA June 20-22, 2013

California State Bar Tax Section Annual Meeting

"State and Federal Responsible Person Penalties" San Jose November 8, 2013

2013 American Bar Association 30th Annual Institute on

1 of 5 6/4/2013 3:55 PM

Sincerely,

<u>Dennis Brager</u>

<u>dbrager@bragertaxlaw.com</u>

310. 208.6200

Do You Know a

Great Tax Litigation Attorney?

We are growing and searching for a great tax litigation attorney. Currently, we have five tax litigation attorneys in our Westwood office. Our tax controversy attorneys only represent clients with tax problems or tax disputes; whether those tax problems are with the IRS, the California Franchise Tax Board (FTB), the State Board of Equalization (SBE) or the Employment Development Department (EDD).

All of our tax lawyers formerly practiced as trial attorneys with the Internal Revenue Service's Office of Chief Counsel, and/ or the Department of Justice. If you know someone with a minimum of five years of experience in tax litigation with an LLM, CPA or IRS, Department of Justice, U.S. Attorney's Office, Tax Court Clerk experience, please pass along our contact information to the person. Thank you.

Dennis Brager dbrager@bragertaxlaw.com

Criminal Tax Fraud and 3rd National Institute on Tax Controversy

Las Vegas December 11-13, 2013

Previous Events

KFWB Radio 980 AM

"Money 101 with Bob McCormick" 9:05 AM - 11 AM PT Los Angeles March 11, 2013 & March 29, 2013 & May 14, 2013

Previous Speeches

Los Angeles County Bar Association's 2013 Tax Night

"International Tax Enforcement Update" Los Angeles February 12, 2013

2012 American Bar Association nth Annual Institute on Criminal Tax Fraud and 2nd National Institute on Tax Controversy

"Tax Strategies, Administrative Tax Strategies and Techniques in a Recessionary Economy" Las Vegas December 6-7, 2012

Articles Quoting Dennis Brager

"Offshore Tax Evaders Taking Big Risk, Former IRS Attorney Says"

Advisor One April 30, 2013

"Bel Air Payroll Firm Sued for Allegedly Keeping Clients' Tax Payments"

The Baltimore Sun March 1, 2013

"Indictment of Swiss Bank
Employees Signals Ongoing
Crackdown on Evasion, Lawyers
Say"

The Bureau of National Affairs January 4, 2013

"New 'Streamlined' IRS
Procedures Effective for
Non-Resident U.S. Citizens"
The Wall Street Journal Online,
September 12, 2012

Articles Written by Dennis Brager

"Third-Party Federal Tax Liens and Levies and How to Fight Them" Journal of Tax Practice & Procedure December 2012/January 2013

"New 'Streamlined' FBAR Filing" Los Angles Daily Journal November 1, 2012

"Case Finds CFOs Liable for Payroll Taxes" CFO.com October 4, 2012

Recent Blog Posts

"Tax Preparers Beware! 6th
Circuit Court of Appeals Affirms
Dismissal of Tax Refund Suit
Due to Inability to Prove Timely
Filing of Amended Return"
April 11, 2013

"Prominent Tax Attorney Found Liable for Civil Tax Fraud Penalties Due to Finding of "Willful Blindness" to Underreporting of Income" March 20, 2013

"Streamlined Foreign Bank Account Report (FBAR) Filing Compliance Procedure FAQs Issued by IRS for Non-Resident Taxpayers" March 6, 2013

"San Diego Used Car Dealer Sentenced in Tax Fraud Case" January 28, 2013

3 of 5

Our Services

- Tax Litigation
- Tax Controversy
- Criminal Tax Defense
- IRS Payroll Tax Problems
- <u>California Payroll Tax</u> <u>Problems</u>
- Tax Fraud
- <u>Tax Preparer Penalties</u>
- Office of Professional Responsibility (OPR)
 Defense
- <u>California Sales Tax</u> <u>Problems</u>
- Tax Audits
- Tax Appeals
- <u>Innocent Spouse</u> <u>Defenses</u>
- Offers in Compromise
- <u>Installment Payment</u> Agreements

The <u>Brager Tax Law Group</u> is a tax litigation and tax controversy law firm, which represents clients with tax problems and tax disputes with the IRS, the California Franchise Tax Board (FTB), the State Board of Equalization (SBE) and the Employment Development Department (EDD). <u>All of the firm's tax lawyers</u> were former trial attorneys with the IRS.











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4 of 5 6/4/2013 3:55 PM

Send to a Colleague





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5 of 5