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# Brager Tax Law Group

May 2013

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

Greetings,

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 [click here](#) or copy and paste the link below into your browser:

[http://apps.americanbar.org/cle/programs/t13ats1.html?sc\\_cid=CET3ATS-B](http://apps.americanbar.org/cle/programs/t13ats1.html?sc_cid=CET3ATS-B)

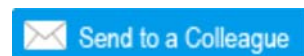
If you have any questions about these topics or any other tax controversy matters, please contact me.

Sincerely,



**Dennis N. Brager, Esq.**

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



### Upcoming Events

**Dennis will be speaking at 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**

**Dennis Brager**  
**dbrager@bragertaxlaw.com**  
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](mailto: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 Angeles 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

## Our Services

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

The **Brager Tax Law Group** 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). **All of the firm's tax lawyers** are former trial attorneys with the IRS.



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