



Brager Tax Law Group

BACK BY POPULAR DEMAND!

NOVEMBER 2020

I am pleased to announce that I recently participated in a Strafford webinar, "[Navigating the IRS Penalty Abatement Procedures for Foreign Information Reporting Noncompliance](#)." Due to overwhelming popularity, we scheduled an encore presentation for Monday, November 23, 1:00pm-2:30pm EDT.

Tax reporting of international accounts and activities is complex, and failure to file foreign tax information forms may lead to potentially ruinous penalties. The IRS continues to focus its attention and resources on international tax compliance reporting.

Our panel will provide tax attorneys and accountants with a detailed discussion of best practices for requesting abatements of IRS penalties due to failure to properly file required international information forms such as the FBAR, Form 8938, and Forms 5471 and 5472. The panel will discuss the current trends in IRS abatement and will provide guidance on drafting abatement requests.

We will review these and other key issues:

- What foreign reporting forms are subject to penalties, and how are the penalties calculated, including current litigation on this issue?
- What are the penalty structures for non-willful and willful failure to file? What standards are used by the IRS and the courts?
- What are the standards for "reasonable cause" abatement?
- How can the IRS' streamlined procedures be used to mitigate various penalties?

I hope you'll join us.

[For more information or to register >](#)

Or call 1-800-926-7926
Ask for Navigating the IRS Penalty Abatement
Procedures on 11/23/2020



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- **Innocent Spouse Defenses**
- **Offers in Compromise**

Mention code: ZDFCA

• **Installment Payment Agreements**

Sincerely,

Dennis N. Brager, Esq.
Brager Tax Law Group

"Bonus"

We once again have 10 complimentary tickets, first come first served for the webinar. Please send your name, email, phone number and company name to Ryan at rmaull@bragertaxlaw.com. If you happen to miss the complimentary tickets, we also have a link to 50% off. Please use the link below to register at the discounted price.

[For 50% off click here!](#)



Brager Tax Law Group
Newsroom

[Listen to Dennis Brager on KFGO being interviewed on Trump's Taxes](#)

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 California Department of Tax and Fee Administration (CDTFA), and the Employment Development Department (EDD). **All of the firm's tax lawyers** are former trial attorneys with the IRS.
