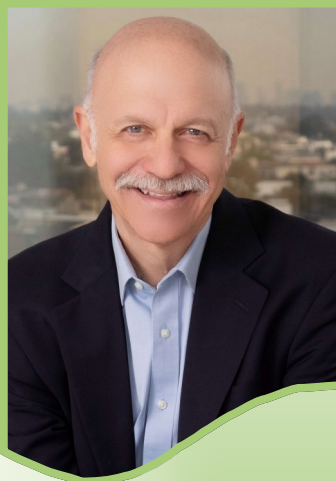


March
2023

Hello
Spring



Greetings from the land of never-ending rain and shivers in Southern California! Despite the damp and chilly weather, spring has arrived, bringing Tax Season along with it. The IRS has granted an extension to October 16th, but don't delay – it's best to get those taxes filed post haste.

Even though we are tax litigation attorneys, we believe that an ounce of prevention is worth a pound of cure. With that in mind, I encourage you to read our article on Jeopardy Levies found on page 2. The IRS can seize a taxpayer's assets without warning or court order if they have cause to issue a Jeopardy Levy.

I also want to caution you about the perils of submitting false tax returns. Recently, a return preparer from Riverside, California was caught filing allegedly false returns. If convicted, he could be staring down the barrel of a three-year prison sentence for each year filed.

On a brighter note, we are proud to share another BTLG tax litigation triumph. Cheryl Frank, one of our attorneys and ex-IRS trial attorney, recently had a client's tax debt reduced by an astounding 99.8%, which you can read more about on page 3. Most of our talented attorneys, like Guy Glaser, are former IRS attorneys. Learn more about him on page 4 and on our website at www.bragertaxlaw.com.

As the season blossoms don't let another one slip away without addressing any looming tax issues. Consult one of our tax litigation attorneys, and in the spirit of spring may the 'luck of the Irish' coax the IRS into blessing you with bountiful tax refunds.

Dennis N. Brager



Brager
Tax
Law
Group

Tax Controversy Law

Spring 2023 E-Newsletter

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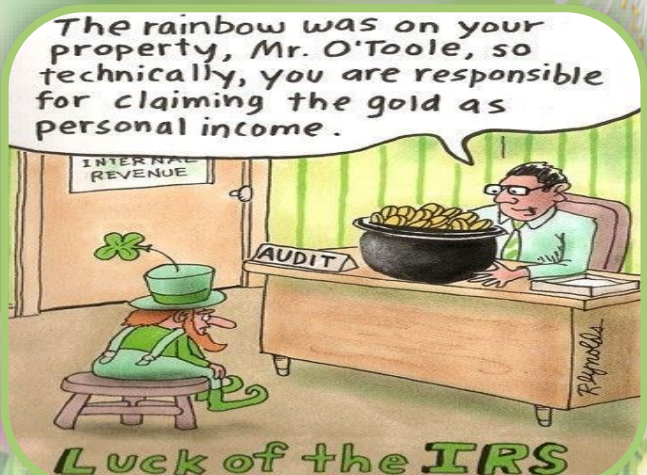
- **Feature Article: What is a Jeopardy Levy** (pages 2 and 3)
- **Another Brager Tax Law Group Success Story - Client has Huge Tax Debt Almost Entirely Eradicated:** (Page 3)
- **Have You Met Attorney Guy Glaser?** (Page 4)

FUN CONTEST ON PAGE 4

We have been experimenting with an artificial intelligence (A.I.) app that can create limericks and poems on demand. So we have come up with a few poems – some with the use of A.I. and others by the spirit of 'human creativity' - aka a staff member.



We are giving a \$25 Starbucks Gift Card to the first lucky reader who replies with the correct answer. To win, you need to distinguish which of the limericks were created using AI and which ones were created by a human. Learn more on page 4.



What is a Jeopardy Levy?

By Dennis N. Brager



A jeopardy levy is typically used in situations where the IRS believes that a taxpayer may be attempting to hide assets or transfer them to someone else in order to avoid paying their debt. The Internal Revenue Manual provides that a jeopardy levy may be issued when taxpayers are:

1. Leaving the country,
2. Moving their property out of the country,
3. Concealing themselves or their property, or
4. Doing any other act that could threaten the collection of tax for the current or preceding tax year.

A jeopardy levy allows the IRS to seize a taxpayer's assets without prior notice or a court order. This means that the IRS can take immediate action to collect the tax debt, rather than having to go through the traditional [collection due process hearing](#), in which the taxpayer has substantial rights including an opportunity to petition the United States Tax Court.

How Does a Jeopardy Levy Work?

When the IRS issues a jeopardy levy, it will essentially freeze the taxpayer's assets and then notify them of the levy. The taxpayer will then have a limited amount of time to respond to the levy and attempt to have it lifted.

In some cases, the IRS may also seize assets that are held in the name of third parties, such as family members or business partners. This can occur if the IRS believes that the taxpayer is attempting to hide assets by transferring them to someone else.

What Are the Consequences of a Jeopardy Levy?

The consequences of a jeopardy levy can be severe for taxpayers. If the IRS seizes a taxpayer's assets, they may be left without the means to pay for basic necessities, such as food and housing.

In some cases, a jeopardy levy can also result in the closure of a business. If the IRS seizes a business' assets, it may not be able to continue operating, which can result in the loss of jobs and income for employees.

What Are the Legal Rights of Taxpayers?

Taxpayers do have legal rights when it comes to jeopardy levies. They have the right to appeal the jeopardy levy and have it reviewed by an independent Appeals Officer.

If a taxpayer believes that the IRS has made an error in issuing the levy, they can also file a lawsuit in federal court to challenge it. This can be an expensive process, but it may be necessary. It's important to note that taxpayers have a limited amount of time to respond to a jeopardy levy—generally 30 days. If they do not take action within the designated time frame, the IRS may proceed with seizing their assets, and the taxpayer may be limited to filing a refund claim to recoup the funds.

The first step though, is to file an appeal with the IRS' Independent Office of Appeals. The Office of Appeals has a limited window of time to make its decision. If Appeals does not make a decision, then on the 16th day after the appeal is filed a taxpayer may file suit in district court to overturn the IRS' decision.

Alternatively, if the decision of the Office of Appeals is unfavorable, then the taxpayer has 90 days from the notice of decision to file suit in district court. There are limited situations in which the Tax Court has jurisdiction to hear a case involving a jeopardy levy.

How Can Taxpayers Avoid a Jeopardy Levy?

The best way for taxpayers to avoid a jeopardy levy is to pay their taxes on time and in full. If they are unable to pay their taxes, they should contact the IRS to discuss payment options, such as installment agreements or an offer in compromise.

It's also important for taxpayers not to misrepresent their financial situation to the IRS. Attempting to hide assets or transfer them to someone else in order to avoid paying taxes can result in severe consequences, including a jeopardy levy, and even criminal prosecution. Taxpayers who have significant financial issues which prevent them from paying their tax debts in full can almost always negotiate a resolution with the IRS as long as they have proper representation.

Conclusion

A jeopardy levy is a powerful tool that the IRS can use to collect tax debts from individuals or businesses who are attempting to put their assets out of the reach of the IRS. While jeopardy levies can have severe consequences for taxpayers, they do have legal rights that can help them challenge or appeal the levy. The tax litigation attorneys at Brager Tax Law Group have the right kind of experience to assist their clients to navigate jeopardy levies, and to avoid having jeopardy levies served.

ANOTHER BRAGER TAX LAW GROUP SUCCESS STORY OF A VERY HAPPY CLIENT



At Brager Tax Law Group, getting the best result for our clients is always our priority.

We recently closed a case with tremendous results for one of our clients who owed both 5 years of federal income tax and a substantial trust fund recovery penalty liability.

The hefty amount owed in total between the two assessments was approximately \$811,000.

After Cheryl Frank, one of our attorneys, addressed the matter, our client's matter was closed with excellent results.

Cheryl proposed an offer of a mere \$2210, which was accepted by the IRS.

Needless to say, our client was beyond ecstatic with the nominal fee that she gladly paid to the IRS in comparison to the astronomical amount that she owed originally.

Visit our website to read more about our [clients reviews](#) and success stories.

Continued from Page 1...

**Artificial Intelligence (A.I.)
Versus
Human Creativity
Competition
\$25 Starbucks Gift Card
for the First Correct Answer Received**

Simply mark AI or Human next to the number of each poem below and email your response back to our editor at aferreira@bragertaxlaw.com

The **winner will be announced on April 4th** by email and also in our next newsletter. All 3 poems must be marked in order to qualify.
Good luck and have fun!

Poem 1

Hearing from the IRS
strikes fear in most.
And the attorneys at Brager Tax Law
don't like to boast.
But, we like hearing from them.
Why, you might say?
Because we fight
so our clients don't have to pay

Poem 2

There once was a tax litigator
Whose clients were always the victor
With arguments so sound
her cases would astound,
and none would contradict her

Poem 3

A tax litigator, sharp as can be,
Had a talent for solving a dilemma, see.
With a wit as quick as a fox,
He could untangle any legal blocks,
While his clients all danced with glee

CONTEST RULES:

- Deadline is April 1st, 2023
- Regrettably no Brager Tax Law Group staff or their families may participate.
- Decisions are final.
- Gift card cannot be exchanged for cash.

**Have You Met
Guy Glaser, Esq.?**



Guy Glaser joined Brager Tax law Group in October 2020, having spent over 30 years working in the IRS's Office of Chief Counsel. While at the IRS, Guy was the recipient of numerous honors and awards.

Guy grew up in Europe and went to elementary school, middle school and his first two years of high school in London, England as well as in Monte-Carlo, Monaco. Guy also attended the Instituto Filipin in Padova, Italy and as a result, he has conversational fluency in Italian and can read both languages, as well.

Guy has been a Ferrari enthusiast virtually his entire life and enjoys watching and attending Formula 1 Grand Prix motor racing.

Guy devotes much of his spare time working with kids in the American Youth Soccer Organization as a volunteer referee and as a member of the Boards of Directors of both Region 87 and Area 11- of the organization.

Guy is happily married and both of his children are college graduates.