

Get **20% OFF** any session from the 2011

SUPER ADVANCED Tax Problem Resolution Seminar

in Vegas

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CORPORATE TAX RESOLUTION ISSUES 1

Robert McKenzie, Esq., CTRS

Bob will lead you through the procedures and requirements for securing relief for tax-troubled corporations. He will discuss:

- Filing a corporate Offer in Compromise,
 - Securing corporate Installment Agreements,
 - Dealing with nominee liens and transferring assets,
 - Advising clients attempting to reorganize a tax-troubled corporation, and
- Considerations in abandoning a tax-troubled corporation and starting anew.

Here is your opportunity to fulfill your Circular 230 Ethics Requirement and learn from the "Godfather of Taxpayer Representation." Bob makes this required topic enjoyable and entertaining. There's no better way to meet this educational requirement.

3 Hours \$147

ETHICS FOR TAXPAYER REPRESENTATIVES

Robert McKenzie, Esq., CTRS

Here is your opportunity to fulfill your Circular 230 Ethics Requirement and learn from the "Godfather of Taxpayer Representation." Bob makes this required topic enjoyable and entertaining. There's no better way to meet this educational requirement.

2 Hours \$98

TAX COURT, IT'S NOT JUST FOR ATTORNEYS

Gerry Levins, Esq., CTRS

Gerry will walk you step-by-step through a Tax Court proceeding. You will gain the acumen of an experienced practitioner at the highest levels of taxpayer representation. Gerry will highlight the opportunities for Enrolled Agents and CPAs and clearly define their potential role in Tax Court cases. He will explain important differences between a full Tax Court and a Small Tax Court proceeding. Attorneys, EAs, and CPAs alike will take-away an understanding of how they can work with the Tax Court.

2 Hours \$98

EMPLOYMENT TAX CASES: THE BIG DOGS

Gary Bluestein, Esq., CTRS

Gary will discuss the employment tax issues that practitioners face when dealing with delinquent employers or non-filing employers including:

- The IRS approach to employers who have paid net payroll without keeping records of gross payroll amounts,
- Effective employment tax case defenses, with citations,
- How-to use bankruptcy to resolve an employment tax case regardless of the ability to discharge,
- When and how-to designate payments in employment tax cases,
- Conflicts of interest in employment tax cases, and
- How to avoid being blindsided by the minefield of conflict issues.

3 Hours \$147

OFFER IN COMPROMISE UPDATE

Patti Logan

Patti will shine her light on the new and improved Offer in Compromise forms and the significance of the IRS changes. You will also learn about new/updated rulings that apply to Offers in Compromise. For example, major changes related to non-liable spouse offers. You will also learn of a major item the IRS seems to no longer have an interest in. This session is crucial in securing an accepted offer for your client, but the best offer possible.

2 Hours \$98

CHANGE OF FOCUS: THE EXAM SIDE OF TAXPAYER REPRESENTATION

LG Brooks, EA, CTRS

Taxpayer Representatives often become locked into thinking of all taxpayer representation as a collection issue. Neglecting the exam side of representation work results in the missed opportunity to help clients and earn substantial fees. Taxpayers find the examination of their returns highly stressful and are willing to engage a professional to avoid meeting with IRS face-to-face. Representing exam cases often results in a larger engagement because any balance due after exam may spawn a collection case.

LG is an expert in representing exam cases and you will receive the benefits of his intimate knowledge of this practice area. He will discuss the red flags and recommended approach to audit problem areas in correspondence audits, office audits, and field audits including:

- Auditor requests for excessive numbers of copies
- Mysterious disappearance of an auditor after getting into the audit
- Implication of an auditor's supervisor becoming involved in the examination
- Dealing with an unreasonable auditor
- Dealing with an auditor expanding the scope of the audit
- How-to handle the fledgling and old pro auditors

3 Hours \$147

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