

**TRI** Tax Resolution Institute

*...where your tax debt is your power!*

“Busy Season”

*...all year long*

[www.taxresolutioninstitute.org](http://www.taxresolutioninstitute.org)

[info@taxresolutioninstitute.org](mailto:info@taxresolutioninstitute.org)

(877) 829-8370

# Low Hanging Fruit

*How to make "real" money in the next 12 months*

# Meet our speaker



**Peter Y. Stephan, CPA**

(800) 658-7590

www.taxresolutioninstitute.org

# **Tax Resolution Full-Day Seminar/Webcast**

- Know when to and when not to submit an offer in compromise
- Learn how and when to abate penalties
- Use the IRS statute of limitations to your benefit
- See if it makes sense for your clients to discharge their taxes in bankruptcy
- Learn what to say to your clients when the IRS calls
- And so much more...

Live Seminar/Webcast: \$299.00/149.00

# Why are we here today?

The Tax Resolution Institute prides itself in assisting accounting, legal and other professionals resolve their client's tax problems and grow their businesses

Take advantage of one of our many programs

- **We help you make more money**
- We teach you how to become a tax resolution specialist
- We become your partner working side-by-side to help you solve your client's IRS and State income, payroll (collection issues) and tax audit issues
- Or...we become your trusted referral source

# Have you downloaded your materials?

Visit [www.taxresolutioninstitute.org/505A](http://www.taxresolutioninstitute.org/505A) to get  
your free content for the next 10 days

If you currently have a client or clients with tax resolution issues  
and need assistance right away call us anytime or email us at

[info@taxresolutioninstitute.org](mailto:info@taxresolutioninstitute.org)

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# Income Taxes

# Solving Income Tax Issues

5 most common methods:

- Installment agreement
- Currently Not Collectible (“CNC”) Status
- Partial-pay installment agreement (“PPIA”)
- Offer in compromise (“OIC”)
- Discharging taxes in bankruptcy



# Low Hanging Fruit #1

## Streamlined Installment Agreements

*Earn \$1,000 - \$2,500 each*

# IRS Streamlined Installment Agreements

Your expertise should dictate the fees you charge, not the time you spend...

- A streamlined installment agreement requires more than just making a call...

# IRS Streamlined Installment Agreements

## Things to consider...

- Does the client owe \$25,000 or less?
- Does the client owe \$50,000 or less?
- Did you advise the client to pay down their liability if they owe more?
- Is the client in current compliance?
- Have recent tax filings posted?

# IRS Streamlined Installment Agreements

## Preparation...

- Do you have your client's bank information (account and routing number)?
- Did you predetermine a day of the month to debit your client's account?
- Have you completed IRS form 9465?
- Have you completed form 433D?

# IRS Streamlined Installment Agreements

Complete the task in one call...

- Do your homework before you make the call...pull transcripts to verify information
- Make sure you have time to wait on hold
- Have all forms completed prior to the call
- Get client signatures as necessary

# IRS Streamlined Installment Agreements

## Summary

- Streamlined installment agreements seem simple but if you are not prepared, you can easily spend extra time completing the task.
- If you are prepared and get things done efficiently, you should be compensated for your knowledge

# IRS Streamlined Installment Agreements

**NEW RULES**

Attend the upcoming 200A course to learn more

# Polling Question 1

Have you ever submitted a streamlined installment agreement?



# What is covered in the 200A Course

- Sequence of events
- Solving income tax issues
- Solving payroll tax issues
- More on Status 63
- Installment agreements
- Offers in compromise
- Innocent spouse
- Criminal investigation
- Complex IRS audits
- Appeals
- How to market and sell your services
- 2 months free support (with other membership benefits)
- And more

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- Learn how and when to abate penalties
- Use the IRS statute of limitations to your benefit
- See if it makes sense for your clients to discharge their taxes in bankruptcy
- Learn what to expect your clients when the IRS calls
- Save so much more...

**20% off**

**Save an additional 10% if you sign up for text alerts!**

August 23<sup>rd</sup>:29<sup>th</sup> and 30<sup>th</sup>

Live Seminar/Webcast: ~~\$299.00/149.00~~

# Payroll Taxes

# Payroll Taxes

- “Borrowing” from the Government
- Section 6672 of the tax code makes individuals personally liable
- The withheld amounts constitute a “fund” one holds in “Trust” for the government.

# Components of Payroll Taxes

Comprised of:

- Trust fund portion (employee withholdings including taxes, Social Security and Medicare)
- Non trust fund portion
- Interest (compounded daily)
- Penalties

Payroll taxes are not Dischargeable in Bankruptcy

Trust Fund portion is assessed personally to Responsible Person/s

A person will be held personally liable for the withheld taxes if...

- They are responsible for its collection and payment
- Their failure to collect the tax and pay it over is “willful”

# Solving Payroll Tax Issues

4 most common methods:

- Installment agreement
- Partial-pay installment agreement (PPIA)
- In-business offer in compromise (“OIC”)
- Hybrid Bulk-Sale and OIC

# Low Hanging Fruit #2

Represent your client in a Trust Fund  
Recovery Penalty 4180 interview

Earn \$4,000 - \$6,000 each



# 4180 Interview

## What is a 4180 Interview?

- This is the process the IRS uses to determine who is personally responsible for not making Federal payroll tax deposits.

# 4180 Interview

Acting timely with respect to assessing your client as the “Responsible Person” for the trust fund recovery penalty is of utmost importance.

Learn more in the upcoming 200A course

# 4180 Interview

## Things to consider...

- Is your client an “owner” of the company?
- Is your client a signer on the bank account?
- Did your client sign paychecks?
- Was your client the decision-maker with respect to non payment of payroll taxes?

# 4180 Interview

## Preparation...

- Obtain a copy of form 4180
- Perform a mock interview – prepare your client
- Prepare a collection information statement (433B if a business entity) to create an installment agreement at the interview?
- Try and limit the number of responsible persons if are representing more than one person?
- Keep your client off the hook personally (at least for the short term...)

# 4180 Interview

Desired outcome...

- Limit the number of responsible persons
- Enter into an installment agreement for the company
- Keep the responsible persons “off the hook” personally, at least for the time being

## Polling Question 2

How often do you have clients with payroll tax issues?

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# Low Hanging Fruit #3

Status 63

keep your client off the hook personally

Earn \$1,000/hr



## Status 63

We cannot stress this enough...your expertise should dictate the fees you charge, not the time you spend...

- Entering your client into Status 63 will save them in ways you cannot imagine

# Status 63

## What is IRS Status 63?

- If a business remains in good standing subsequent to entering into an installment agreement, the IRS may delay/forego assessing and collecting from responsible person/s.

# Status 63

## Things to consider...

- Is the business able to maintain installment agreement payments?
- Will the business stay current on tax filings?
- Can the business make estimated payments going forward?
- Are the responsible persons in compliance on a personal level?

# Status 63

## Benefits

- The entity/owners only need to make a single monthly payment
- The responsible person/s need not pay personally
- The responsible person/s credit is not affected

# Low Hanging Fruit #4

## ~~Bulk Sale~~

Earn \$20,000 more

This will be covered in the upcoming 200A course

# Taxes and Bankruptcy

# Taxes and Bankruptcy

- Income taxes may be discharged in bankruptcy
- Certain rules (“conditions”) must be met to discharge taxes in bankruptcy
- Payroll Taxes may not be discharged in bankruptcy

# Bankruptcy Tax Dischargeability Rules:

- **Three-Year Rule**

At least Three years from the due date of the tax return including extensions; or

- **Two-Year Rule**

At least Two years from the date the tax return was filed (we say assessed) for delinquent returns; and

- **240-Day Rule**

At least 240 days from the date of assessment of an audited or amended tax return



## Examples of Tolling Events (effects statutes of limitation)

Statute of Limitation for collection by the IRS tolls (is frozen and therefore extended) under the following circumstances:

- 240 days; plus
- The number of days each offer in compromise for the applicable tax had been pending; plus
- 30 days for each applicable offer in compromise; plus
- The number of days each prior bankruptcy proceeding had been pending after the related tax return due date with valid extensions; plus
- Six months for each applicable bankruptcy proceeding
- The period of time taxpayer spends living outside the country

# Become a TRI Member

What to do...  
when things get tough

## **Ultimate Level**



This program shows you how to fix the problem  
when most think they're done!

...don't get left behind

Two-months free when you attend the 200A Seminar or Webcast

# Low Hanging Fruit #5

Prepare a tax dischargeability analysis

Earn \$1,500 – 4,000

# Tax Dischargeability Analysis

What is a Tax Dischargeability Analysis (TDA)?

- This is an analysis used to determine if and when income taxes may be dischargeable in bankruptcy based upon conditions including the 3-year rule, the 2-rule, the 240-day rule and tolling events.

# Tax Dischargeability Analysis

Things to consider...

- Were the tax returns filed timely?
- Did the IRS prepare substitutes for returns (SFR's)?
- How much time has passed since the return/s were filed?
- Were the tax return/s amended?
- Was there a previous installment agreement?
- Was a CAP, CDP or other type of appeal filed?

# Tax Dischargeability Analysis

More things to consider...

- Was an offer in compromise submitted?
- Was the taxpayer out of the country for an extended period of time?
- Did the taxpayer file a previous bankruptcy?
- Were the tax return/s amended?

## Polling Question 3

Do you currently practice tax resolution?

# Low Hanging Fruit #6

~~5 sales tips  
every service professional should know~~

Close more sales

Covered in the upcoming 200A course



# Summary of Today's Low Hanging Fruit

- Streamlined installment agreement
- Represent your client in a Trust Fund Recovery Penalty 4180 interview
- Status 63 – keep the Trust Fund recovery penalty from hitting you client's credit
- Bulk Sale (covered in 200A)
- Tax Dischargeability Analysis
- 5 sales tips every service professional should know (covered in 200A)

“Sell knowledge not time...”

## **Our mission today...**

- 1) Help you make money**
- 2) Teach you how to become a tax resolution specialist;**
- 3) Become your tax resolution partner; or**
- 4) Become your trusted referral source**

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Call us at: (800) 747-8718

**I'm Peter Stephan....**

**...and this is TRI**

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