

## When to Refer Your Client to an IRS Specialist

### A Practical Guide for Florida Attorneys & Tax Preparers

When your client has an IRS problem, you need someone you can call. I'm Jim Payne — a CPA and former IRS agent with 40 years of experience representing Florida taxpayers before the IRS Collections and Examination divisions. I work exclusively in IRS representation and handle the cases attorneys and tax preparers can't. Your client relationship stays intact. Their IRS problem gets resolved.

#### BANKRUPTCY ATTORNEYS

##### Refer your client when:

- **Pre-petition IRS debt.** Back taxes may be dischargeable in Chapter 7 — but strict timing rules govern. I analyze the 3-year, 2-year, and 240-day tests before you file.
- **A federal tax lien exists.** Liens survive bankruptcy. Early analysis protects asset division and avoids surprises at closing.
- **Payroll taxes are involved.** Trust Fund Recovery Penalties follow the owner personally — they don't discharge. A separate IRS strategy is required.
- **Chapter 13 includes IRS debt.** Priority vs. non-priority classification determines what gets paid. I provide the analysis your plan depends on.
- **A Revenue Officer is assigned.** An active RO doesn't pause for bankruptcy. Coordinate before filing.

#### FAMILY LAW ATTORNEYS

##### Refer your client when:

- **Joint returns were filed.** Both spouses remain fully liable to the IRS regardless of what the divorce decree says. The IRS is not bound by it.
- **Innocent Spouse Relief may apply.** IRC §6015 can relieve a spouse of liability — but the window to file is limited and the process is complex.
- **A tax lien is on marital property.** Federal tax liens affect asset division, refinancing, and property transfers. Address before settlement is final.
- **One spouse has unfiled returns.** Unfiled returns are a collection time bomb that must be resolved before assets are divided.
- **Business income is at issue.** Unreported income, payroll tax problems, or IRS audits affecting the marital estate need immediate attention.

#### TAX PREPARERS

##### Refer your client when:

- **A CP2000 arrives.** Proposed changes from unreported income require a strategic response — not just an amended return.
- **A Revenue Officer contacts your client.** This signals the account is in serious collection status. Don't handle this alone.
- **Bank accounts are levied.** A levy release requires negotiation and a resolution plan. Speed matters.
- **Multiple years of unfiled returns.** Non-filer cases require a coordinated strategy before returns are submitted to avoid triggering collection.
- **Payroll tax deposits are missing.** Trust Fund Recovery Penalty interviews carry personal liability risk and must be handled carefully.
- **Client owes more than \$50K.** At this level the IRS assigns cases to collection units. Standard payment plans may not be the best strategy.

### HOW THE REFERRAL WORKS

#### 1. You Call or Email

Describe the situation. No charge for the initial conversation.

#### 2. I Assess the Case

I analyze transcripts, financials, and IRS status to find the best strategy.

#### 3. We Coordinate

I handle all IRS communication. You stay informed. Your client stays yours.

### SERVICES

- Offer in Compromise
- Trust Fund Penalty Defense
- Installment Agreements
- Non-Filer Representation
- Currently Not Collectible
- IRS Audit Representation
- Levy & Lien Release
- Collection Due Process Appeals
- Payroll Tax Resolution
- IRS Transcript Monitoring