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Matters of Interest

IRS Settlement Tip #1: Consider Interest Costs When Negotiating a Multi-Year Settlement with the IRS

Corporations often fight tooth and nail over tax dollars when settling controversies with little, if any consideration given to the related interest costs. The IRS negotiator is not concerned with interest – he or she is looking for bottom line tax totals. If you are settling, say, five years, it may be less expensive for your company to acquiesce on certain tax issues/amounts with the agreement that they apply only to year five than to enter into a settlement that perhaps spreads less total tax into earlier years. While this scenario is not always possible, the benefit of avoiding interest in earlier years might more than make up for the additional tax agreed to in later years. The trick is in being able to gather real-time total cash outlay figures in the course of a negotiation, preferably without the IRS being aware of your focus on interest. That is where professional interest specialists working behind the scenes can assist you best *before* a settlement agreement is finalized.

IRS Settlement Tip #2: When a Multi-Year Settlement Includes Both Tax Deficiencies and Overpayments, You May Save By Actually Paying The Deficiency Before the IRS Offsets Overpayments to the Deficiency Year

This oft-overlooked payment strategy, born of a Court of Federal Claims decision a decade ago, can save millions of dollars if applied correctly. For more details, refer to the article [Payment Strategy to Reduce Costs of IRS Settlements](#), linked on our website. We will be pleased to assist in determining whether your fact pattern is conducive to savings and isolating the actual cash benefit of applying the strategy.

TEI Audits and Appeals Seminar in San Diego, February 21-23

IPRG is proud to participate in this year's Exhibitor's Expo on February 21st from 5PM to 7PM. Stop by IPRG's exhibit table and complete a short information form for a free \$10 Starbucks gift card and a chance to win an iPad 2.

IPRG's Form 1139 Expedited Refund Support Services

Gone are the days when the IRS would allow practitioners to physically deliver Forms 1139 and 4466 directly to Service Center personnel for special handling. However, errors on the forms, often resulting from IRS-generated posting errors on account transcripts of which taxpayers are unaware, continue to result in unnecessary delays in processing. IPRG can verify that all forms, documents and schedules that are attached to a refund claim are correct as required by the IRS. This extensive

review will allow the IRS to process the claim in a timely manner. IPRG can forward the claim to the proper IRS Service Center and section for processing and remain in contact with the person assigned to the form's review, solving any problems that arise during the review. We can also assist in submitting the proper form needed to generate electronic refunds, where applicable.

IPRG's Referral Awards Program

IPRG will send a \$100 Visa gift card to any tax professional that refers to us a prospect that engages IPRG. This offer is subject to its compliance with receipt of gift policies at your place of employment. Simply contact us with the prospect's contact information, or have them mention that you referred them to us if they contact us directly.

About IPRG

Located in Atlanta, New York and Dallas, IPRG is a leading provider of interest and penalty recovery services, bringing more than 70 years of collective experience to the table. We work quietly behind the scenes while leaving you and your staff to concentrate on other priorities. We offer unmatched response time, the combined experiences of five practices and flexible pricing options. Our specialties include:

- Federal & state interest and penalty recoveries.
- Interest netting studies.
- Expedited refund processing assistance.
- Payment strategies.
- Assistance with IRS notices and account corrections.
- Expert witness services.

For assistance with any of the above issues, call me at 404.582.0298 or email us at info@iprg.net.