Index to Text

ABATEMENT AGREEMENTS—Cont'd Extending statute of limitations, 3:10 Penalties generally, 4:139 et seq. Installment agreements generally, **4:22 to 4:29** for detailed treatment, see index heading for detailed treatment, see index heading PENALTIES Record system of IRS, 8:42 INSTALLMENT AGREEMENTS Liens. 3:52 ABSENCE FROM COUNTRY **AIRPLANES** Abatement of penalties, 4:142 Filing notice of lien against, 3:27 Statute of limitations, 3:9 ALTER EGO **ACCEPTANCE** Trust fund recovery penalty, 5:106 Offers in compromise, 6:72, 6:73 **ACCOUNTANTS AMENDMENT** Fees. See index heading ACCOUNTING FEES Offers in compromise, **6:61** Trust fund recovery penalty, 5:15 APPEALS **ACCOUNTING** Delinquent notice processing, 2:46 Sale of seized assets, 3:248 generally, 3:118 to 3:161 ACCOUNTING FEES for detailed treatment, see index heading LEVY Installment agreements, 4:49 Liens, 3:9, 3:16, 3:104 Judicial relief from collection actions, 7:20 to Offers in compromise, 6:62 to 6:64 7:24 Penalties, 4:150 to 4:153 ACCOUNTS RECEIVABLE Privacy Act rights, 8:30 Trust fund recovery penalty, 5:48, 5:83 to 5:86 Levy, **3:163** Liens, 3:49 APPLICATION OF PAYMENTS Offers in compromise, 6:43 Trust fund recovery penalty **ADVANCES** generally, 5:50 to 5:60 Liens, 3:48 for detailed treatment, see index heading TRUST FUND RECOVERY PENALTY **ADVERTISING APPRAISALS** Sale of seized assets, 3:225 to 3:227 Liens, 3:83 ADVICE **APPROVAL** Abatement of penalties, 4:142 Chapter 11 plan, 7:60 AFTER-ACQUIRED PROPERTY In-business trust fund (IBTF) express installment Liens, 3:50 agreements, 4:26 Installment agreements, 4:41, 4:59 AGE OF TAXPAYER Liens, 3:111 Offers in compromise, 6:34, 6:47 Offers in compromise, 6:59 to 6:61 **AGREEMENTS** Seizures. See index heading seizures Collateral agreements ASSESSMENT generally, 4:123 to 4:127

Liens, 3:3, 3:4

Generally, 3:56

ATTORNEYS

ATTACHMENT LIEN

Fees. See index heading attorney's fees

for detailed treatment, see index heading COL-

for detailed treatment, see index heading offers

LATERAL AGREEMENTS

generally, **6:1 to 6:84**

IN COMPROMISE

Compromise

BANKRUPTCY—Cont'd ATTORNEYS—Cont'd Chapter 7—Cont'd Taxpayer rights to representation, 4:83 evaluating dischargeability, 7:74 Trust fund recovery penalty responsibility, 5:15 priority taxes, 7:72 ATTORNEY'S FEES unreasonable revenue officers, avoiding, 7:75 Installment agreements, 4:2, 4:49 Chapter 11 Judicial relief from collection actions, 7:20 to generally, 7:58 to 7:64 approval of plan, 7:60 Negotiations, 4:1, 4:2 improper postbankruptcy payment of trust fund taxes, 7:64 **AUDIT RECONSIDERATION** Generally, 4:154 to 4:158 payments during bankruptcy, 7:62 Documentation, 4:157 prebankruptcy payment of trust fund taxes, 7:63 Examination division criteria, 4:156 presentation of plan, 7:59 Inappropriate requests, 4:158 Requirements, 4:155 trust fund recovery penalty asserted, 7:61 Chapter 13 Taxpayer rights, 4:156 generally, 7:65 to 7:70 **AUTOMATED COLLECTION SYSTEM (ACS)** administration of plan, 7:65 Accelerated issuance, 2:8 confirmations, conditions for Chapter 13 Avoiding ACS, 2:28 confirmations, 7:70 Delinquent notice processing, generally, 2:2 debtor retaining assets, 7:66 Harassment, 2:26 forced payment plan, 7:68 Negotiations, 4:35 partial payment of liabilities, 7:69 Notice of levy, 2:9 voting by creditors, 7:67 Record system of IRS, 8:24 Collection due process (CDP) proceedings, 3:150 Return calls, 2:27 Confirmations, conditions for Chapter 13 Seizures, 3:113 confirmations, 7:70 Telephone collection efforts, 2:15 Currently not collectible (CNC) accounts, 4:113 1040 notice procedure, 2:6 Damages for violations of Bankruptcy Code, 7:80 AUTOMATIC DATA PROCESSING (ADP) Debtor retaining assets, 7:66 Record system of IRS, 8:4, 8:31 Dischargeable taxes, 7:73 **AUTOMATIC STAY** Dismissal, 7:76 Bankruptcy, 7:56, 7:83 Forced payment plan, 7:68 Liens, 3:9 **AUTOMOBILES** Litigating tax liabilities, 7:81 to 7:83 Filing notice of lien against, 3:27 Negotiations, 3:258 **BANK ACCOUNTS** Offers in compromise, 6:53, 6:71 Levy, **3:162**, **3:170**, **3:188** Partial payment of liabilities, 7:69 Payments during, 7:62 **BANK ERROR** Post-bankruptcy actions, 7:79, 7:80 Penalty abatement, 4:147 Prebankruptcy payment of trust fund taxes, 7:63 BANKRUPTCY Presentation of plan, 7:59 Generally, 7:55 to 7:85 Priority taxes, 7:72 Abatement of tax, 7:79 Trust fund recovery penalty, 5:57 to 5:60, 7:61 Administration of Chapter 13 plan, 7:65 Types, 7:57 Approval of Chapter 11 plan, 7:60 Unreasonable revenue officers, avoiding, 7:75, Automatic stay, 7:56, 7:83 7:84 Caveat, 7:85 Voting by creditors, 7:67 Chapter 7 **BONDS** generally, 7:71 to 7:78 Collateral agreements, 4:124 adverse effects, 7:77 Securing payment, 3:51 Bankruptcy Abuse Prevention and Consumer Protection Act of 2005, 7:78 **BUSINESS ASSETS** dischargeable taxes, 7:73 Offers in compromise, 6:41 to 6:43 dismissal, 7:76 Seizure, 3:116, 3:199, 3:201

CAF REPRESENTATIVE FILE (CAFR)

Integrated data retrieval system (IDRS), 8:16

CASE FILES

Record system of IRS, 8:26, 8:27

CASUAL SALES

Liens, 3:36

CASUALTIES

Penalty abatement, 4:142, 4:144

CERTIFICATE OF SALE

Generally, 3:237

CERTIFICATION

Nonattachment, application for, 3:89

CHAPTER 7

Generally, 7:71 to 7:78

For detailed treatment, see index heading BANK-RUPTCY

CHAPTER 11

Generally, 7:58 to 7:64

For detailed treatment, see index heading BANK-RUPTCY

CHAPTER 13

Generally, 7:65 to 7:70

For detailed treatment, see index heading BANK-RUPTCY

CHARITABLE EXPENSES

Installment agreements, 4:49

CHECK SIGNING AUTHORITY

Trust fund recovery penalty responsibility, **5:12**, **5:18**, **5:19**, **5:24**

CHILD CARE

Installment agreements, 4:49

CHILD SUPPORT PAYMENTS

Levy, **3:172**

CLOSELY HELD COMPANIES

Offers in compromise, 6:36

COLLATERAL AGREEMENTS

Generally, 4:123 to 4:127

Avoiding federal tax liens, 4:125

Bonds, 4:124

Mortgages, 4:124

Offers in compromise, 6:66 to 6:68

Practical considerations, 4:127

Securing payment agreement, **4:126**

Types, 4:124

COLLECTION APPEALS PROGRAM

Installment agreements, 4:63

COLLECTION DUE PROCESS (CDP) PROCEEDINGS

Generally, 3:17 to 3:22, 3:124 to 3:161

Alternatives to collection, consideration of, **3:128**Appeals

ppears

determination by, 3:157

hearing, 3:141

preclusion of issues by, 3:156

Audit reconsideration, 3:146

Balancing analysis of Section 6330(c)(2)(C), 3:154

Bankrupt proceedings, 3:150

Challenging liability, 3:21

Delays in collection, 3:24, 3:160

Disqualified employment tax levy, 3:125

District court cases, 3:151

Equivalent hearings, 3:23, 3:159

Forum, 7:93

Frivolous challenges to liability, **3:139**

Impartiality, 3:18

Interest, 3:148

Issue raised at administrative hearing, requirement of, 3:135

Joinder of issue in lien and levy actions, 7:93

Judicial review, 3:22 et seq., 3:158, 3:160, 7:92

Jurisdiction retained by IRS office of appeals, 3:26

Liability challenges, 3:21

Liability challenges (Section 6330(c)(2)(B)), 3:133

Liability dispute opportunities, 3:147

Liens, 3:17 to 3:22, 3:25

Matters considered at, 3:19, 3:126

Negotiations, 3:256

Notice

IRS CDP procedures, 3:20

liability challenges, 3:21

prior CDP notice, 3:145

Offer in compromise, 3:130, 3:131

Penalties. 3:148

Pleadings, 7:93, 7:95

Pre-assessment letters, 3:143

Presumptions of official regularity and delivery, 3:137, 3:138

Reconsideration of rejected offer in compromise, 3:131

Refund claim, disallowance of, 3:144

Rejection, return of, 3:129

Review standards, 7:94

Right to, **3:17, 3:124**

Rules of Tax court, 7:93

Self-reported taxes, 3:134

Statute of limitations suspended, 3:25, 3:161

Statutory notice of deficiency, receipt of, 3:136

COLLECTION DUE PROCESS (CDP) **COMPUTER SYSTEM** PROCEEDINGS—Cont'd IRS system, generally, 8:3 TEFRA proceedings, 3:152 CONFERENCE REQUEST 30-day letter in deficiency cases, 3:142 Levy, **3:183** Timeliness of equivalent hearing requests, 3:23 Waiver of receipt of notice of deficiency, 3:149 CONSENT Seizure in private areas, 3:204 COLLECTION INFORMATION STATEMENTS (CIS) CONTRIBUTION RIGHT Amount of payments, 4:33 Trust fund recovery penalty, 5:14 Cash flow statement, 4:38 **COOPERATION** Dangers of submitting, 4:31 Seizure, 3:215 Form 433-A, 4:32 to 4:34 Form 433-B, 4:36 to 4:38 **CORPORATE OFFICERS** Form 433-F, 4:35 Trust fund recovery penalty Hardship, basis for reporting accounts uncollectgenerally, **5:7 to 5:11** ible, 4:109 for detailed treatment, see index heading TRUST Negotiations FUND RECOVERY PENALTY generally, 4:29 to 4:38 CORPORATE SHAREHOLDER amount of payments, 4:33 Purchase at sale, 3:241 cash flow statement, 4:38 dangers of submitting, 4:31 **CREDITORS** Form 433-A, **4:32 to 4:34** Bankruptcy voting, 7:67 Form 433-B, **4:36 to 4:38** Trust fund recovery penalty responsibility, 5:20 Form 433-F, 4:35 CRIMINAL OFFENSES AND PENALTIES substantial net worth, 4:37 Investigations, Gen. App. 8 Substantial net worth, 4:37 Monthly filing of employment taxes, 4:174 **COLLECTION PROCEDURES** Nonfiling. generally, 1:23 to 1:27 Generally, 3:1 to 3:277, Gen. App. 2, Gen. App. for detailed treatment, see index heading FILING Delays for judicial review, 3:24, 3:160 Due process (CDP) proceedings CURRENTLY NOT COLLECTIBLE (CNC) generally, 3:17 to 3:22 ACCOUNTS for detailed treatment, see index heading COL-Generally, **4:106 to 4:122** LECTION DUE PROCESS (CDP) PROCEEDINGS Annual notice of delinquent tax, 4:122 Levy Bankruptcy, 4:113 generally, 3:110 to 3:258 Basis for, 4:108, 4:109, 4:110 for detailed treatment, see index heading LEVY Codes for hardship, 4:118 Liens Contact attempts unsuccessful, 4:112 generally, 3:2 to 3:116 Decedents' estates, 4:114 Effect of designation, **4:121** for detailed treatment, see index heading LIENS Employment taxes, 4:117 Policy statements, Gen. App. 5 Power of IRS to collect taxes, 3:1, 3:2 Expenses allowable, 4:116 Follow-up mandatory, 4:119 Private collection. See index heading DELINQUENT NOTICE PROCESSING Hardship, 4:107, 4:109, 4:110, 4:118 Seizures Inability to pay, 4:116 generally, 3:110 to 3:258 Location of taxpayer or assets not discernible, 4:111 for detailed treatment, see index heading LEVY Release of levy, **4:107** Subsequent actions by IRS, 4:120 to 4:122 generally, 3:259 to 3:277 Tolerance of small liabilities, 4:115 for detailed treatment, see index heading SUM-

COMPLIANCE INITIATIVE PROJECTS (CIP)

Filing returns, 1:11

CUSTOMER SERVICE REPRESENTATIVES

Delinquent notice processing, 2:2, 2:29

Waiver of statute of limitations, 4:120

DAMAGES	DELINQUENT NOTICE PROCESSING
Generally, 7:5 to 7:10	Cont'd
Accounting and attorney's fees, 7:20 to 7:24	Customer service representatives, 2:2, 2:29
Attorney's fees, 7:20 to 7:24	Divided service centers. Service campuses, below
Bankruptcy Code violations, 7:80	Duty offices, 2:30, 2:31
Collection due process actions. See index head-	Elite collectors, 2:33
ing collection due process proceedings	Field referral to revenue officers. Revenue officers, below
Exclusive remedy, 7:8 Exhaustion of administrative remedies, 7:18 ,	Four-level system, 2:2
7:19	Government entities, 2:53
Failure to release lien, 7:12, 7:15, 7:17	Harassment by personnel, 2:26
Fraudulent information return penalties, 7:90 ,	Hotlines for practitioners, 2:14
7:91 Frivolous litigation, 7:11	Industry alignment of large and mid-size business division, 2:52
Negligence, 7:6	Integrated data retrieval system (IDRS), 2:13
Nominee liens, 7:16	Interview of taxpayer, 2:21, 2:38
Statute of limitations, 7:9, 7:10	Investigation function, 2:16, 2:23
Taxpayer privacy, 7:86 to 7:89	Investigation procedure, 2:37
Taxpayer rights, 4:89, 4:90	Large and mid-size business (L&MSB), 2:47 , 2:51 , 2:52
DEATH	Levy notice, 2:9 , 2:36
Penalty abatement, 4:142	Lien, notice prerequisite to, 2:6
DEBITS	Local offices, resolving problems audit
Installment agreements, 4:69	techniques, 2:13
DECEDENTS' ESTATES	Negotiations with revenue officers, 2:44 to 2:46
Currently not collectible (CNC) accounts, 4:114	Organization of IRS generally, 2:47 to 2:53
DEED	agency-wide service organizations, 2:48
Title suits, 7:47	government entities, 2:53
	industry alignment, 2:52
DEFERRED PAYMENT	large and mid-size business (L&MSB), 2:51
Offers in compromise, 6:27	self-employed, 2:50
DELINQUENCY	small business, 2:50
For detailed treatment, see index heading FILING	tax exempt entities, 2:53
RETURNS	wage and investment (W&I), 2:49
Notice processing	Payment plans, 2:31
generally, 2:1 to 2:55	Power of revenue officers, 2:36
for detailed treatment, see index heading DELIN- QUENCY NOTICE PROCESSING	Practitioner priority service hotline, 2:14 Priorities
DELINQUENT NOTICE PROCESSING	practitioner service hotline, 2:14
Generally, 2:1 to 2:55	systemic, 2:24
Accelerated issuance, 2:8	Private collection. Avoiding ACS, above
Agency-wide service organizations, 2:48	Production pressure on revenue officers, 2:39 to
Appeals, 2:46	2:43 Ouglity of personnel 2:25 2:26
Assignment of cases, 2:34	Quality of personnel, 2:25, 2:26 Quality of service campus, 2:12 to 2:14
Automated Collection System (ACS), generally, 2:2	Queue for telephone collections, 2:18
Avoiding ACS	Research function, 2:16
generally, 2:28	Return calls, 2:27
Collection of taxes, 2:1, 2:2	Revenue officers
Compliance policy and services, 2:54, 2:55	generally, 2:32 to 2:36
Computers, generally, 2:1	assignment of cases, 2:34
Contact function, 2:16, 2:20 to 2:22	elite collectors, 2:33
Correspondence with service campus, 2:10, 2:11	investigation procedure, 2:37
Currently not collectible (CNC) accounts. 4:122	negotiations with. 2:44 to 2:46

DELINQUENT NOTICE PROCESSING	DEPOSIT SECURED LOANS
—Cont'd	Liens, 3:43
Revenue officers—Cont'd	
place in four-tier system, 2:2	DEPOSITS
power, 2:36	Delinquent payers, 4:172
production pressure, 2:39 to 2:43	Designation of deposits, 4:94
superior, appeal to, 2:46	Direction of payments, 5:55
targeted inventory levels, 2:35	Employment taxes, 4:171, Gen. App. 3
Taxpayer Bill of Rights, 2:41, 2:42	FTD alerts, 4:171 Penalties for failure to deposit, 4:133, 4:134
unqualified, 2:45	•
Service campuses	DESIGNATED PAYMENTS
generally, 2:10 to 2:14	Trust fund recovery penalty, 5:53, 5:55
accounts management, 2:4	DIRECTION OF PAYMENTS
compliance services, 2:4	Trust fund recovery penalty
computer-generated notices, 2:2	generally, 5:52 to 5:60
correspondence with, 2:10, 2:11	for detailed treatment, see index heading TRUST
divided campuses, 2:4 organization of IRS, 2:4	FUND RECOVERY PENALTY
quality of, 2:12 to 2:14	DICADII ITW INCIID ANCE
submission processing, 2:4	DISABILITY INSURANCE
Service centers. Service campuses, above	Installment agreements, 4:49
Small business/self-employed division (SB/SE),	DISCHARGE OF LIENS
2:47, 2:50	Generally, 3:77 to 3:84
Small dollar plans, 2:11	For detailed treatment, see index heading LIENS
Start of collection action, 2:5	DISCLOSURES
Submission processing centers	Collection activities to spouse, 3:94
generally, 2:3 to 2:9	Filing returns, 1:11
accelerated issuance, 2:8	Privacy rights. See index heading TAXPAYER
divided campuses, 2:4	PRIVACY PRIVACY
divided centers. Service campuses, above	Trust fund recovery penalty, 5:22 , 8:2
levy notice, 2:9	DISMISSAL
start of collection action, 2:5	
1040 notice procedure, 2:6	Bankruptcy, 7:76
Superior, appeal to, 2:46	DISPOSABLE INCOME
Systemic priority, 2:24	Installment agreements, 4:46
Targeted inventory levels, 2:35	DIVORCED SPOUSES
Tax exempt and government entities division (TE/GE), 2:47, 2:53	Liens, 3:91, 3:99
Taxpayer Advocate, 2:46	DOCUMENT LOCATOR NUMBER
Taxpayer Bill of Rights, 2:41, 2:42	Record system of IRS, 8:17
Technical questions, 2:55	•
Telephone collections	DUTY OFFICES
generally, 2:15 to 2:19	Delinquent notice processing, 2:30, 2:31
contact function, 2:20 functions, 2:16	ECONOMIC HARDSHIP
inventory management, 2:19	Levy, 3:178, 3:181
queue, 2:18	EDUCATION
team approaches to ACS processing, 2:17	EDUCATION
1040 notice procedure, 2:6	Installment agreements, 4:49
Time constraints, 2:24	EMBEZZLEMENT
Time of telephone calls, 2:20	Trust fund recovery penalty, 5:35, 5:136
Unqualified revenue officers, 2:45	
Wage and investment (W&I), 2:47, 2:49	EMPLOYMENT TAXES
	Currently not collectible (CNC) accounts, 4:117
DEPENDENT CARE	Deposit requirements, 4:171, Gen. App. 3
Installment agreements, 4:49	Federal tax deposits (FTD), 4:171 , 4:172

EMPLOYMENT TAXES—Cont'd

Installment agreements

generally, 4:73 to 4:79

for detailed treatment, see index heading INSTALLMENT AGREEMENTS

Levy appeal rights, disqualified employment tax levy, **3:125**

Monthly filing, 4:173, 4:174

Offers in compromise, 6:54 to 6:56

Trust fund recovery penalty

generally, 5:1 to 5:140

for detailed treatment, see index heading TRUST FUND RECOVERY PENALTY

Withholding taxes. See index heading withhold-ING TAXES

ENCODER NUMBER

Record system of IRS, 8:39

ENDORSEMENT OF CHECKS

Record system of IRS, 8:32

ENTIRETY, TENANCY BY

Exempt status under state law does not bind federal collector, **3:108**Liens, generally, **3:106 to 3:109**Transfer to spouse, **3:109**

EQUITY

Borrowing to installment agreements, **4:39** Effective tax administration, **6:77**, **6:84** Innocent spouse relief See index heading LIENS

ERROR OR MISTAKE

Levy, negotiations concerning, **3:187** Liens, **3:74** Penalties, **4:142** Penalty abatement, **4:142** Taxpayer rights, **4:99**

ESCROW

Sale proceeds, 3:81

ESTOPPEL

Trust fund recovery penalty, 5:75

EXCISE TAXES

Offers in compromise, 6:54 to 6:56

EXEMPT PROPERTY

Seizure, 3:195

EXHAUSTION OF ADMINISTRATIVE REMEDIES

Damages actions, 7:18, 7:19

EXPENSES

Currently not collectible (CNC) accounts, expenses allowable, **4:116**Installment agreements generally, **4:42 to 4:52**

EXPENSES—Cont'd

Installment agreements—Cont'd for detailed treatment, see index heading INSTALLMENT AGREEMENTS

Liens, 3:54

FAILURE TO DEPOSIT

Penalties, 4:133, 4:134

FAILURE TO FILE PENALTIES

Generally, **4:129**

For detailed treatment, see index heading PENAL-TIES

FAILURE TO PAY PENALTIES

Generally, 4:130

For detailed treatment, see index heading PENAL-TIES

FAIR DEBT COLLECTION PRACTICES

Taxpayer rights, 4:91

FAST TRACK MEDIATION

Negotiations, **4:8 to 4:11**Specially trained mediator negotiations, **4:10**

FEDERAL TAX DEPOSITS (FTD)

See index heading DEPOSITS

FEDSTATE INITIATIVE PROCEDURES

Delinquency check programs, 1:14

FIDUCIARY LIABILITY

Trust fund recovery penalty, 5:107 to 5:110

"53" ING AN ACCOUNT

See index heading currently not collectible (CNC) accounts

FILING RETURNS

Generally, 1:1 to 1:27

Compliance initiative projects (CIP), 1:11
Computer notices of investigation, 1:17
Computer preparation of return by IRS, 1:5, 1:6
Computer program for discovery of nonfilers, 1:8
to 1:10

Criminal nonfiling

generally, 1:23 to 1:27
interview of taxpayer, 1:26
preparing referral, 1:27
referral by collection division, 1:24
targeted individuals 1:25

targeted individuals, **1:25** Criminal penalties, **1:4**

Information resources, 1:10

IRC § 6020(b), 1:19

IRS preparation of returns, 1:5, 1:6, 1:18, 1:19

Late filing penalties, **1:1** Record system of IRS, **8:25** 60-month payment plan, **1:3**

FIRE

Penalty abatement, 4:142, 4:144

FIXTURES

Offers in compromise, 6:40

FLOOD

Penalty abatement, 4:142, 4:144

FLOOR PLANNED INVENTORY AND EQUIPMENT

Liens, 3:50

FORCE

Seizure of assets, 3:214

FORGETFULNESS

Penalty abatement, 4:142

FORM W4 PROGRAM

Nonfiler program, 1:7

401Ks

Levy, **3:167**

FRAUD

Conveyances. See index heading fraudulent CONVEYANCES

Failure to file, generally, 4:129

Trust fund recovery penalty. See index heading
TRUST FUND RECOVERY PENALTY

FRAUDULENT CONVEYANCES

Trust fund recovery penalty

generally, **5:91 to 5:103**

for detailed treatment, see index heading TRUST
FUND RECOVERY PENALTY

FRIVOLOUS LITIGATION

Damages, 7:11

FURNITURE

Offers in compromise, 6:40

FUTURE INCOME

Offers in compromise, 6:26, 6:48

GLOSSARY

Generally, Gen. App. 9

GOVERNMENT ENTITIES

Delinquent notice processing, 2:53

HARASSMENT OF TAXPAYERS

Automated Collection System, 2:26

HARDSHIP

Currently not collectible (CNC) accounts, **4:107**, **4:109**, **4:110**, **4:118**

Effective tax administration, 6:77, 6:84

Offers in compromise, determining an acceptable offer amount, **6:84**

Penalty abatement, 4:142

HEALTH CARE

Installment agreements, 4:49

HOMESTEAD

Spousal rights, 3:90

HOUSING

Installment agreements, 4:47

IADIS

Integrated data retrieval system (IDRS), 8:14

IGNORANCE OF LAW

Penalty abatement, 4:142

ILLEGAL IMMIGRANTS

Trust fund recovery penalty, 5:118

ILLNESS

Hardship, basis for reporting accounts uncollectible, **4:109**

Penalty abatement, 4:142

Trust fund recovery penalty, 5:39

IN-BUSINESS TRUST FUND (IBTF)

Installment agreements, 4:26

INCARCERATION

Hardship, basis for reporting accounts uncollectible, **4:109**

INDEPENDENT CONTRACTORS

Levy, **3:175**

INJUNCTIONS

Generally, 7:25 to 7:28, 7:33, 7:34

Anti-injunction statute

generally, 7:25, 7:26

exceptions, 7:27, 7:28, 7:33, 7:34

Premature collection action, **7:28**

Prompt collection of revenue, 7:26

Rescission of payment plan, 7:34

INNOCENT SPOUSE RELIEF

Generally, 3:95 to 3:105

For detailed treatment, see index heading LIENS

INSTALLMENT AGREEMENTS

Generally, 4:22 to 4:29

Accounting fees, 4:49

Allowable, **4:42**, **4:43**

Approval by managers, 4:59

Approved agreements on IDRS, 4:41

Attorney's fees, 4:49

Attorney's retainer amount, 4:2

Borrowing power of taxpayer, **4:39**

Business taxpayers

generally, 4:73 to 4:79

application of payments to trust fund portion,

express installment agreements, 4:73

Index to Text-8

INSTALLMENT AGREEMENTS—Cont'd	INSTALLMENT AGREEMENTS—Cont'd
Business taxpayers—Cont'd in-business trust fund criteria, 4:77	In-business trust fund (IBTF) express installment agreements, 4:26
positive cash flow, 4:75	Independent administrative review, 4:60 to 4:62
projected cash, 4:76	Levy restrictions and, 4:64
repeater cases, 4:78	Liens, 3:76
Charitable expenses, 4:49	Life insurance, 4:49
Child care, 4:49	Liquidating assets, 4:39
Collection appeals program, 4:63	Modifications, 4:28
Completion of page 6 of CIS, 4:40	National standards, 4:53
Compliance, 4:56	Necessary, 4:43, 4:49 to 4:52
Court-ordered payments, 4:49	Negotiation tactics, 4:55 to 4:64
Criteria for granting, 4:39 to 4:54	Online payment agreements, 4:25
Dependent care, 4:49	Partial payment installment agreements, 4:71
Direct debit, 4:69	Partial payment installment agreements, waiver
Disability insurance, 4:49	procedures for, 4:72
Disposable income, 4:46	Payroll deduction, 4:67, 4:68
Education, 4:49	Pending agreements on IDRS, 4:41
Elimination of excessive or unnecessary	Preparation by representative, 4:55
expenses, 4:54	Production of income, 4:51
Employment taxpayers. See Business taxpayers	Professional association dues, 4:49
above	Record system of IRS, 8:14
Equity credit borrowing, 4:39	Rejected agreements on IDRS, 4:41
Expenses	Secured debts, 4:49
generally, 4:42 to 4:52	Specific balance due accounts, 4:70
accounting fees, 4:49	Statute of limitations extensions, 4:57
allowable, 4:42 , 4:43	Streamlined installment agreements, 4:24
attorney's fees, 4:49	Substantiation, expenses which will not require,
charitable expenses, 4:49	4:45
child care, 4:49	Taxes, 4:49
court-ordered payments, 4:49	Taxpayer rights, 4:85 , 4:100
dependent care, 4:49	Telephone, 4:49
disability insurance, 4:49	Transportation, 4:48
disposable income, 4:46	Types of taxes applicable to, 4:22
education, 4:49	Union dues, 4:49
elimination of excessive or unnecessary	User fee, 4:58
expenses, 4:54	Utilities, 4:47
health care, 4:49	Variations, 4:66 to 4:72
housing, 4:47	Waiver
life insurance, 4:49	partial payment installment agreements, waiver
national standards, 4:53	procedures for, 4:72
necessary, 4:43, 4:49 to 4:52	statute of limitations, 4:57
negotiation tactics, 4:55 to 4:64	Withholding by employer, 4:67, 4:68
production of income, 4:51	
professional association dues, 4:49	INSURANCE
secured debts, 4:49	Liens, 3:42, 3:47
substantiation, expenses which will not	INTEGRATED DATA RETRIEVAL SYSTEM
require, 4:45	(IDRS)
taxes, 4:49	Generally, 8:7 to 8:9
telephone, 4:49	Availability at local offices, 8:8
transportation, 4:48	CAF representative file (CAFR), 8:16
union dues, 4:49	Delinquent notice processing, 2:13
Guaranteed availability of, 4:23	IADIS, 8:14
Health care, 4:49	Installment agreements, pending, approved and
Housing, 4:47	rejected, 4:41

INTEGRATED DATA RETRIEVAL SYSTEM (IDRS)—Cont'd

INTST, 8:15

LEVYS, 8:13

MFTRA, 8:11

Notices, 8:9

RPING, 8:16

SMRY, 8:12

Transcripts, securing, 8:10, 8:11, 8:23

TXMOD transcripts, 8:10, 8:11

INTEREST

Collection due process (CDP) proceedings, **3:148** Large corporate tax obligations, **4:136**, **4:137**

Liens, 3:54

Record system of IRS, 8:15

INTERVIEW OF TAXPAYER

Delinquent notice processing, 2:21, 2:37 Nonfiler investigations, 1:21, 1:26

INTST

Integrated data retrieval system (IDRS), 8:15

INVENTORY

Liens, 3:50

Seized property, 3:211

Telephone collections, inventory management, 2:19

INVESTIGATIONS

Criminal offenses, Gen. App. 8

Delinquent notice processing, 2:16, 2:23, 2:37

Nonfilers

generally, 1:16 to 1:22

for detailed treatment, see index heading FILING

Trust fund recovery penalty

generally, 5:23 to 5:28

for detailed treatment, see index heading TRUST FUND RECOVERY PENALTY

IRAs

Levy, 3:165, 3:167

IRS RESTRUCTURING AND REFORM ACT OF 1998

Effective tax administration, 6:77

IRS STRATEGIC PLAN

Policies, Gen. App. 4

JEOPARDY LEVIES

Generally, 3:121, 3:122

JOINT BANK ACCOUNTS

Levy, 3:188

JOINT OWNERSHIP

Offers in compromise, 6:44 to 6:46

JUDICIAL RELIEF FROM COLLECTION ACTION

Generally, 7:1 to 7:95

Anti-injunction statute

generally, 7:25 to 7:28

for detailed treatment, see index heading

INJUNCTIONS

Bankruptcy. See index heading BANKRUPTCY

Damages actions

generally, 7:5 to 7:10

for detailed treatment, see index heading DAM-AGES

Frivolous litigation, 7:11

Injunctions

generally, 7:25 to 7:28, 7:33, 7:34

for detailed treatment, see index heading INJUNCTIONS

Levy. See index heading LEVY

Penalties, 7:29 to 7:31

Preparer penalties, 7:31

Privacy rights of taxpayers, 7:86 to 7:89

Refund suits

generally, 7:35 to 7:41

for detailed treatment, see index heading

Substantially justified standard for award of

accounting and attorney's fees, 7:21 Taxpayer bill of rights, 7:1 to 7:4

Taxpayer privacy, 7:86 to 7:89

Title suits

generally, 7:46 to 7:54

for detailed treatment, see index heading TITLE

Trust fund recovery penalty stay, 7:29, 7:30

JUDICIAL REVIEW

Collection due process (CDP) proceedings, **3:22** et seq., **3:158**, **3:160**, **7:92** to **7:95**

Delays in collection procedures for, 3:24, 3:160

Levy, 4:20, 7:27

Liens, 7:27

Offers in compromise, 6:64

Seizure, 3:202

JURISDICTION

Refund suits, 7:36

Title suits, 7:46

KEOGHS

IRS collection procedures, 3:167, 3:182

KNOWLEDGE

Trust fund recovery penalty, 5:33, 5:34

LAND TRUSTS

Redemption of, 3:245

LANDLORDS

Liens, 3:55

LARGE AND MID-SIZE BUSINESS (L&MSB)	LEVY—Cont'd
DIVISION	Form 668-A notice—Cont'd
Delinquent notice processing, 2:47, 2:51, 2:52	pension plans, 3:165 , 3:167
LENDERS	social security benefits, 3:169
Trust fund recovery penalty liability, 5:87 to 5:90	waiver of early withdrawal tax, 3:166
	401Ks, 3:167
LEVY	Friendly bidder, 3:239
Generally, 3:110 to 3:258	Holding period prior to sale, 3:226
Accounting for sale of seized assets, 3:248	Independent contractors, 3:175
Accounts receivable, 3:163	Installment agreements and, 4:64
Advertising sale, 3:225 to 3:227	IRAs, 3:165, 3:167
Appeal rights	Jeopardy levies, 3:121 , 3:122
generally, 3:118 to 3:161	Joint bank accounts, 3:188
collection appeal rights, 3:127	Judicial relief from collection action
collection due process hearing	judicial review of, 4:20 , 7:27
generally, 3:124 to 3:161	wrongful levy. Wrongful levy, below
for detailed treatment, see index heading	Land trusts, redemption of, 3:245
COLLECTION DUE PROCESS HEARING	Lump sum IRAs or pension plans, 3:165
jeopardy levies, 3:121 , 3:122	Minimum bid price
judicial review, 4:20	generally, 3:220 to 3:224
negotiations, 4:14	arbitrary determination of value, 3:221
notice requirements, 3:119	contesting undervaluation, 3:223
post-notice hearings, 3:120	establishing, 3:222
prior rights, 3:123	failure to reach, 3:236
state tax refund levies, 3:121	negotiations, 3:252
Approval process, 3:111	new rules, 3:224
Automated collection seizures, 3:113	Negotiations
Bank accounts, 3:162, 3:170, 3:188	generally, 3:250 to 3:258, 4:14 to 4:20
Bankruptcy option, 3:258	appeal rights, 4:14
Benefit income, 3:164	bankruptcy option, 3:258
Bid price. Minimum bid price, below	collection due process appeal, 3:256
Business assets seizures, 3:116	exceptions, 4:17
Cash loan value of insurance, 3:168	judicial review, 4:20
Certificate of sale, 3:237	minimum bid price payment, 3:252
Child support payments, 3:172	notice of intent to, 4:15
Collection due process hearing	notice of levy, 3:186
generally, 3:124 to 3:161	offer in compromise, 3:257
for detailed treatment, see index heading COL-	post notice hearings, 4:16
LECTION DUE PROCESS HEARING	post-seizure, 3:230
Conference request, 3:183	post-seizure payment plans, 3:251
Corporate shareholder's purchase at sale, 3:241	prior rights, 4:18
Description of property for sale, 3:227	public pressure, 3:254
Economic hardship, 3:178 , 3:181	strict compliance with statutes demanded,
Erroneous levy, negotiations concerning, 3:187	3:253
Exceptions, 4:17	taxpayer assistance order, 3:255
Failure to honor, 3:189, 3:190	Notice
Form 668-A notice	appeals, 3:119
generally, 3:162 to 3:169	delinquent notice processing, 2:9, 2:36
accounts receivable, 3:163	encumbrances, 3:234
bank accounts, 3:162, 3:170	Form 668-A notice. Form 668-A notice, above
benefit income, 3:164	negotiations, 3:186, 4:15
cash loan value of insurance, 3:168	practical considerations, 3:185 to 3:177
401Ks, 3:167	release of notice of levy, 3:182 to 3:184
IRAs, 3:165, 3:167	seizure of residence, 3:217
lump sum IRAs or pension plans, 3:165	types of, 3:117

LEVY—Cont'd	LEVY—Cont'd
Offer in compromise, 3:257	Wrongful levy—Cont'd
Pension plans, 3:165 , 3:167	time to file, 7:43
Post-notice hearings, 3:120, 4:16	,
Post-seizure negotiations, 3:230, 3:251	LIENS
Prior rights, 4:18	Generally, 3:2 to 3:116
Record of sale, 3:247 to 3:249	Absence from country as affecting statute of limi-
Record system of IRS, 8:13	tations, 3:9
Redemption of property, 3:238, 3:244 to 3:246	Absence of equity, 3:78
Release	Accounts receivable, 3:49
criteria for, 3:178, 3:181	Action to release erroneous, 3:31 Advances, 3:48
currently not collectible, 3:180	<i>'</i>
currently not collectible (CNC) accounts,	Agreement to extend statute of limitations 3:10
4:107	Agreement to extend statute of limitations, 3:10 Alter ego, 5:106
notice of levy, 3:182 to 3:184	Anter ego, 3:100 Appeals, 3:9, 3:16
requesting, 3:177	Applying for discharge, 3:82
seized property, 3:228 to 3:230	Appraisals, 3:83
uncollectible amount, 3:179	Approval process, 3:111
wage levy	Assessment prerequisite, 3:3, 3:4
generally, 3:176 to 3:181	Assessment prerequisite, 3.3, 3.4 Attachment lien, 3:56
criteria for, 3:178, 3:181	Attorney's liens, 3:41
currently not collectible, 3:180	Avoidance of priority, 3:29
requesting, 3:177	Avoiding, 3:51
uncollectible amount, 3:179	Avoiding litigation, 3:73
Residential seizure, 3:115	Bankruptcy, 3:9
Return of seized property, 3:229	Bond to secure payment, 3:51
Sale of seized assets	Casual sale purchases, 3:36
generally, 3:231 to 3:243	Certification of nonattachment, application for,
for detailed treatment, see index heading SALE	3:89
OF SEIZED ASSETS	Collateral agreements, 3:52, 4:125
Seizure of assets	Collection due process (CDP) hearing, 3:17 to
generally, 3:110 to 3:116	3:22, 3:25, 7:93
for detailed treatment, see index heading	Creation, 3:3 to 3:5
Social security benefits, 3:169	Damages actions
Spouse's purchase, 3:240	liens, 7:12, 7:15 to 17
State tax refund levies, 3:121	nominee liens, 7:16
Take home pay limitations, 3:173	Deposit secured loans, 3:43
Taking assets, 3:114	Discharge
Taxpayer assistance order, 3:184, 3:219, 3:255	generally, 3:77 to 3:84
Time of writ of entry, 3:209	absence of equity, 3:78
Uniform asset disposal mechanism, 3:242	applying for, 3:82
Wages	appraisals, 3:83
generally, 3:171 to 3:181	escrow of sale proceeds, 3:81
•	foreclosing mortgagees, 3:80
child support payments, 3:172	portion of taxpayer property, 3:79
firing employee prohibited, 3:174	priorities, 3:60 , 3:61
independent contractors, 3:175	special estate tax lien, 3:60, 3:61
release of levy. Release, above	suit for, 3:84 Disclosure of collection activities to enouge 3:04
take home pay limitations, 3:173	Disclosure of collection activities to spouse, 3:94
Waiver of early withdrawal tax, 3:166	Divorced spouses, 3:91 , 3:99 Duration, 3:6 , 3:7
Wrongful levy	
generally, 7:32, 7:42 to 7:45	Equitable relief. Innocent spouse relief, below
seizure erroneous, 7:44, 7:45	Erroneously filed liens, 3:74 Esserony of sole proceeds, 3:81
third-party recovery for erroneous seizure, 7:45	Escrow of sale proceeds, 3:81 Expenses, 3:54

LIENS—Cont'd	LIENS—Cont'd
Expiration of statute of limitations, 3:12	Notice—Cont'd
Extensions of statute of limitations, 3:9, 3:10,	IRS CDP procedures, 3:20
3:53	judicial review of collection due process hear-
Extent, 3:6 , 3:7	ing, 3:22
Filing determination, 3:66	nonfiling determinations, 3:67 to 3:69
Floor planned inventory and equipment, 3:50	place of filing, 3:27 , 3:30
Foreclosing mortgagees, 3:80	prerequisites, 2:6, 3:3, 3:4
Foreclosure of special estate tax lien, 3:62	refiling of, 3:70
45-day rule, 3:49 , 3:50	requirements, 3:15
Inadvertent lien filings, 3:75	seizure without, 3:28
Innocent spouse relief	Offer in compromise, 3:9 , 3:11
generally, 3:95 to 3:105	Partial payment, effect of, 3:4
circumstances for granting, 3:103	Personal liability for special estate tax lien, 3:64
divorced, 3:99	Personal property, generally, 3:35 to 3:37
election to allocate, 3:98	Place of filing, 3:27, 3:30
eligibility for, 3:102	Portion of taxpayer property, 3:79
equitable relief, generally, 3:101	Possessory liens on personal property, 3:37
factors considered, 3:105	Priorities
knowledge, 3:97	generally, 3:45 to 3:48
lime deadline, 3:100	accounts receivable, 3:49
living apart, 3:99	advances, 3:48
review of equitable innocent spouse relief,	after-acquired property, 3:50
3:104 separated, 3:99	attachment lien, 3:56
Installment agreement, 3:76	discharge of lien, 3:60 , 3:61 expenses, 3:54
Insurance, 3:42 , 3:47	floor planned inventory and equipment, 3:50
Interest, 3:54	45-day rule, 3:49 , 3:50
Inventory, 3:50	insurance, 3:42, 3:47
Judicial review of collection due process hearing,	interest, 3:54
3:22	inventory, 3:50
Landlords, 3:55	landlords, 3:55
Levy	life insurance, 3:42 , 3:47
generally, 3:110 to 3:258	local law, 3:39 , 3:46
for detailed treatment, see index heading LEVY	mortgages, 3:48
Life insurance, 3:42 , 3:47	security interests, 3:49
Local law, 3:39 , 3:46	shifting lien, 3:61
Mechanic's liens, 3:40	special estate tax lien, 3:57
Mortgages, 3:48	subordination of tax lien, 3:85, 3:86
Motor vehicles, 3:34	super priorities. Super priorities, below
Nominees, 5:105	Public service liens, 3:39
Nonattachment of, 3:88, 3:89	Real property tax liens, 3:38 to 3:40
Nonfiling determinations, 3:67 to 3:69	Refiling of notice, 3:70
Nonpayment prerequisite, 3:3 , 3:4	Release
Notice	generally, 3:71 to 3:76
generally, 3:13 to 3:31	appeals procedures, 7:12 to 7:15, 7:17
appeal rights, 3:16	avoiding litigation, 3:73
avoidance of priority, 3:29	damages actions for failure to, 7:12, 7:15, 7:17
collection due process (CDP) hearing, 3:17 to	erroneously filed liens, 3:74
3:22	inadvertent lien filings, 3:75
extent of lien, 3:30	methods, 3:73
failure to release, 3:72	notice of failure to release, 3:72
filing determination, 3:66	taxpayer rights, 4:88, 4:89
five days after filing, 3:14	TBR2 changes and release procedures, 3:76
impartial hearing, 3:18	title suits, 7:54

LIENS—Cont'd	LIENS—Cont'd
Retail purchases, 3:35	Super priorities—Cont'd
Rights of IRS, 3:2	mechanic's liens, 3:40
Satisfaction, 3:7	motor vehicles, 3:34
Securities, 3:33	personal property, generally, 3:35 to 3:37
Security interests, 3:44, 3:49	possessory liens on personal property, 3:37
Seizures to satisfy	public service liens, 3:39
generally, 3:110 to 3:258	purchase money security interests, 3:44
for detailed treatment, see index heading	real property tax liens, 3:38 to 3:40
SEIZURES	retail purchases, 3:35
Separated spouses, 3:99	securities, 3:33
Shifting lien, 3:59 , 3:61	utilities liens, 3:39
Special estate tax lien	TBR2 changes and release procedures, 3:76
generally, 3:57 to 3:65	Tenancy by entirety, 3:106 to 3:109
broad liability, 3:63	Utilities liens, 3:39
discharge of, 3:60 , 3:61 extent of, 3:58	Waiver of statute of limitations, 3:9
foreclosure of, 3:62	LIFE INSURANCE
personal liability, 3:64	Installment agreements, 4:49
shifting lien, 3:59 , 3:61	Liens, 3:42 , 3:47
Spousal rights	MACHINERY AND EQUIPMENT
generally, 3:90 to 3:105	Offers in compromise, 6:33
disclosure of collection activities, 3:94	•
discretion of court, 3:93	MASTER FILES
divorce, 3:91, 3:99	Record system of IRS, 8:5
election to allocate, 3:98	MATCHER PROGRAM
equitable relief, 3:101 to 3:105	Delinquency check programs, 1:15
innocent spouse relief. Innocent spouse relief,	
above	MCKENZIE, ROBERT E.
living apart, 3:99	Statement of, Gen. App. 10
partial interests seized, 3:92	MECHANIC'S LIENS
separated, 3:99	Liens, 3:40
Statute of limitations	MFTRA
generally, 3:8 to 3:12	
absence from country, 3:9	Integrated data retrieval system (IDRS), 8:11
agreement to extend, 3:10	MIDWEST AUTOMATED COMPLIANCE
appeal's effect, 3:9	SYSTEM (MACS)
bankruptcy, 3:9	Delinquency check programs, 1:13
changes in, 3:11	MIRANDA WARNINGS
collection due process hearing, suspension	Criminal nonfiling, 1:23
during, 3:25	•
expiration, 3:12	MISTAKE
extensions, 3:9, 3:10, 3:53	See index heading error or mistake
offer in compromise, 3:9 , 3:11 waiver, 3:9	MODIFICATION
	Installment agreements, 4:28
Statutory requirements, 3:4	•
Subordination of tax lien, 3:85, 3:86	MONTHLY FILING
Subrogation, 3:87 Suit for discharge, 3:84	Employment taxes, 4:173 , 4:174
<u> </u>	MORTGAGES
Super priorities	Collateral agreements, 4:124
generally, 3:32 to 3:43	Liens, 3:48
attorney's liens, 3:41	MOTOD VEHICLES
casual sale purchases, 3:36	MOTOR VEHICLES
deposit secured loans, 3:43	Liens, 3:34
insurance contracts, 3:42	Offers in compromise, 6:42

NATIONAL COMPUTER CENTER TRANSCRIPTS	NEGOTIATIONS—Cont'd Taxpayer advocate—Cont'd
Record system of IRS, 8:21	for detailed treatment, see index heading TAXPAYER ADVOCATE
NATURAL DISASTERS	Taxpayer rights
Penalty abatement, 4:142 , 4:144	generally, 4:80 to 4:92
NEGLIGENCE	for detailed treatment, see index heading
Damages actions, 7:6	
Trust fund recovery penalty liability, 5:36	NOMINEES
NEGOTIATIONS	Trust fund recovery penalty liability, 5:104 to 5:106
Generally, 4:1 to 4:174	NONFILERS
Amount of liability, 4:19 Appeal procedure, 4:6	Generally, 1:7
Appeals to management, 4:7	For detailed treatment, see index heading FILING
Appears to management, 4.7 Attitude, 4:4 to 4:21	RETURNS
Attorney's fees, 4:1 , 4:2	NOTICE
Audit reconsideration	Collection due process proceedings. See index
generally, 4:154 to 4:158	heading collection due process (CDP)
for detailed treatment, see index heading AUDIT RECONSIDERATION	PROCEEDINGS
Automated collection system (ACS), 4:35	Delinquent notice processing
Collateral agreements	generally, 2:1 to 2:55 for detailed treatment, see index heading DELIN-
generally, 4:123 to 4:127	OUENT NOTICE PROCESSING
for detailed treatment, see index heading COL-	Encumbrances, 3:234
LATERAL AGREEMENTS	Integrated data retrieval system (IDRS), 8:9
Collection due process hearings	Levy. See index heading LEVY
generally, 4:12, 4:13	Liens
statute of limitations suspended, 4:21	generally, 3:13 to 3:31
Collection information statements (CIS)	for detailed treatment, see index heading LIENS
for detailed treatment, see index heading col- LECTION INFORMATION STATEMENTS (CIS)	Nonfiling, 1:16 , 1:17 Seizures, 3:28
Delinquent notice processing, 2:44 to 2:46	Taxpayer rights, 4:81
Fast track mediation, 4:8 to 4:11	Third party contact by IRS, 4:97, 4:98, 7:88,
Installment agreements	7:89
generally, 4:22 to 4:29	Title suits, 7:50
for detailed treatment, see index heading	Trust fund recovery penalty, 5:72 to 5:74
INSTALLMENT AGREEMENTS	OFFERS IN COMPROMISE
Levy	Generally, 6:1 to 6:83
generally, 3:250 to 3:258, 4:14 to 4:20	Acceptance, 6:72 , 6:73
for detailed treatment, see index heading LEVY	Adequacy generally, 6:23 to 6:37
Liens, 4:20 Payment arrangements. See index heading PAY-	age of taxpayer, 6:34
MENT ARRANGEMENTS	amount of offer, 6:29
Penalties	average bank account balance, 6:35
generally, 4:128 to 4:153	business assets, 6:41 to 6:43
for detailed treatment, see index heading	cash offer, 6:25
PENALTIES	closely held companies, 6:36
Power of attorney, 4:3	components of collectibility, 6:26
Prolonging, 4:5	deferred payment offers, 6:27
Retainer, 4:2	digital assets, 6:38
Statute of limitations suspended during collection	dissipation of assets, 6:32
due process proceedings, 4:21	education of taxpayer, 6:34
Taxpayer advocate	experience of taxpayer, 6:34 fixtures, 6:40
generally, 4:159 to 4:163	natures, 0:40

OFFERS IN COMPROMISE—Cont'd	OFFERS IN COMPROMISE—Cont'd
Adequacy—Cont'd	Future income, 6:26 , 6:48
force sale value of assets, 6:31	Going concern value, 6:37
full pay processing, 6:24	Health of taxpayer, 6:34 , 6:47 , 6:71
furniture, 6:40	Income determination
going concern value, 6:37	generally, 6:47 to 6:53
health of taxpayer, 6:34	aggressive negotiations, 6:51
joint ownership of assets, 6:44 to 6:46	available income, 6:49
machinery and equipment values, 6:33	expenses, generally, 6:52
motor vehicles, 6:42	future income, 6:26 , 6:48
other considerations, 6:34	negotiations, 6:49 , 6:51
past income of taxpayer, 6:34	prebankruptcy, 6:53
pension plans, 6:39	quick sale value, 6:50
personal effects, 6:40	Joint ownership of assets, 6:44 to 6:46
present income of taxpayer, 6:34	Judicial review, 6:64
profession of taxpayer, 6:34	Levy, 3:257
quick sale value of assets, 6:30	Liens, 3:9 , 3:11
receivables, 6:43	Machinery and equipment values, 6:33
short-term deferred payment offer, 6:27	Motor vehicles, 6:42
summary of payment terms, 6:28 Age of taxpayer, 6:34 , 6:47	New offer, 6:13
Allowable expense standards, 6:2 , 6:12	New offers, 6:15 Operating businesses, offers from, 6:57
Amendment request, 6:61	Other considerations, 6:34 , 6:47
Amount of offer, 6:20 , 6:21 , 6:29	Past income of taxpayer, 6:34 , 6:47
Appeals, 6:62 to 6:64	Pension plans, 6:39
Approval process, 6:59 to 6:61	Personal effects, 6:40
Attorney's retainer amount, 4:2	Prebankruptcy income determination, 6:53
Average bank account balance, 6:35	Present income of taxpayer, 6:34 , 6:47
Bankruptcy, 6:53, 6:71	Processabilty, determining, 6:17
Barriers to substantive consideration, 6:18	Processing, 6:22
Business assets, 6:41 to 6:43	Profession of taxpayer, 6:34 , 6:47
Cash offer, 6:25	Promoting effective tax administration
Closely held companies, 6:36	generally, 6:78 to 6:84
Collateral agreements, 6:66 to 6:68	acceptable offer amount, determining, 6:84
Compliance center hindrance to substantive	basis for effective tax administration offer,
consideration of offers, 6:19	6:83
Corporate trust fund liabilities, 6:58	economic hardship, 6:80
Deferred payment offers, 6:27	exceptional circumstances, 6:82
Delegation order 11, 6:60	special rules for evaluating offers, 6:79
Dissipation of assets, effect of, 6:32	undermining compliance, 6:81
Doubt as to Collectibility (DATC) Offer, 6:83	Public policy, 6:65
Doubt as to Collectibility with Special Circum-	Quick sale value of assets, 6:30, 6:50
stances (DSCS) Offer, 6:83	Reasonable Collection Potential (RCP), 6:83
Doubt as to liability, 6:69 , 6:70 , 6:83	Receivables, 6:43
Education of taxpayer, 6:34 , 6:47	Record of acceptance, 6:73
Effective tax administration, 6:77	Reducing tax liabilities
Employment taxes, 6:54 to 6:56, 6:57, 6:58	generally, 6:1 to 6:21
Environment of offer, 6:2 , 6:76	addresses, 6:15
Excise taxes, 6:54 to 6:56, 6:57, 6:58	allowable expense standards, 6:2 , 6:12
Experience of taxpayer, 6:34 , 6:47	amount of offer, 6:20 , 6:21
Financial problems, 6:71	application fee, requirement of, 6:17
Fixtures, 6:40	barriers to substantive consideration, 6:18
Forced sale value of assets, 6:31	compliance center hindrance to substantive
Furniture, 6:40	consideration of offers, 6:19
Future compliance, 6:74 , 6:75	deemed accepted, 6:11

OFFERS IN COMPROMISE—Cont'd	PAYMENT ARRANGEMENTS—Cont'd
Reducing tax liabilities—Cont'd	Negotiations—Cont'd
environment of offer, 6:2	installment agreements
failure to installment payment, 6:9	generally, 4:22 to 4:29
failure to make deposit, 6:6	for detailed treatment, see index heading
forms, use of correct form, 6:17	INSTALLMENT AGREEMENTS
low-income taxpayers, 6:10	short-term extensions, 4:65
new offers, 6:13 , 6:15 payment with offers, 6:5	time of payment, pay within 60 or 120 day agreement, 4:27
processabilty, determining, 6:17	Offers in compromise, summary of payment
return of offer, 6:16	terms, 6:28
standards, 6:2, 6:12	Refund suits, 7:37
statutory mandate, 6:3	Short-term extensions, 4:65
supporting documents, 6:14	Time of payment, pay within 60 or 120 day
2006 statutory revisions, 6:4	agreement, 4:27
· ·	Tracers, 8:41
Refund suits, 7:39 , 7:40	Trust fund recovery penalty liability, 5:45
Return of offer, 6:16	
Short-term deferred payment offer, 6:27	PAYROLL DEDUCTION
Spouses, 6:44 to 6:46, 6:75	Installment agreements, 4:67, 4:68
Standards, 6:2 , 6:12	PENALTIES
Statutory mandate, 6:3	Generally, 4:128 to 4:153, Gen. App. 7
Summary of payment terms, 6:28	Abatement of penalties
Supporting documents, 6:14	generally, 4:139 to 4:148
Trust fund liabilities, 6:57	failure to deposit, 4:134
Withholding taxes, 6:54 to 6:56	interest on large corporate tax obligations,
OPTICAL CHARACTER	4:137
READER/REMITTANCE PROCESSING	reasonable cause. Reasonable cause to abate, below
SYSTEM (OCR/RPS)	Absence as reasonable cause to abate, 4:142
Record system of IRS, 8:33, 8:34	Administrative waivers, 4:142
PARTIAL PAYMENT	Advice by IRS or tax professional, 4:142
Liens, effect on, 3:4	Appeals procedure, 4:150 to 4:153
	Bank error for dishonor of check, 4:147
PARTNERSHIPS	Casualties, 4:142 , 4:144
Penalties, 4:146	Collection due process (CDP) proceedings, 3:148
PAYMENT ARRANGEMENTS	Criminal. See index heading CRIMINAL OFFENSES
Collateral agreements	AND PENALTIES
generally, 4:123 to 4:127	Death as reasonable cause to abate, 4:142
for detailed treatment, see index heading col-	Dishonored remittance, 4:135
LATERAL AGREEMENTS	Error by IRS, 4:142
Delinquent notice processing, 2:31	Failure to deposit, 4:133 , 4:134
Designation of deposits, 4:94	Failure to file, generally, 4:129
Extensions, 4:65	Failure to fay, generally, 4:130
Installment agreements	
generally, 4:22 to 4:29	Fire as reasonable cause to abate, 4:142 , 4:144
	Flood as reasonable cause to abate, 4:142 , 4:144
See index heading installment agreements	Forgetfulness as reasonable cause to abate, 4:142
Negotiations 4.02	Fraudulent failure to file, generally, 4:129
generally, 4:93	Ignorance of law, 4:142
collateral agreements	Illness as reasonable cause to abate, 4:142
generally, 4:123 to 4:127	Interest on large corporate tax obligations, 4:136 ,
for detailed treatment, see index heading	4:137
COLLATERAL AGREEMENTS	Judicial relief from collection action, 7:29 to
designation of deposits, 4:94	7:31
extensions, 4:65	Mistake as reasonable cause to abate. 4:142

PENALTIES—Cont'd Mitigation if installment agreements in effect, 4:131	PENALTIES—Cont'd Trust fund recovery penalty generally, 5:1 to 5:140
Natural disasters as reasonable cause to abate, 4:142, 4:144	for detailed treatment, see index heading TRUST FUND RECOVERY PENALTY
Nonfiling, 1:1, 1:4	Undue hardship, 4:142
Oral advice by IRS as reasonable cause to abate, 4:142	Written advice by IRS as reasonable cause to abate, 4:142
Ordinary business care and prudence, 4:142	PENSION PLANS
Partnerships, 4:146	
Postal service delay, 4:145	Levy, 3:165 , 3:167 Offers in compromise, 6:39
Prior compliance, 4:148	Offers in compromise, 0.33
Procedural requirements, 4:138	PERSONAL LIABILITY
Reasonable cause to abate	Special estate tax lien, 3:64
generally, 4:140 to 4:149	DEDCONAL DEODEDEN
absence, 4:142	PERSONAL PROPERTY
administrative waivers, 4:142	Liens, generally, 3:35 to 3:37
advice by IRS or tax professional, 4:142	PLEADINGS
bank error for dishonor of check, 4:147	Collection due process proceedings, 7:93 , 7:95
casualties, 4:142 , 4:144	
consideration by IRS, 4:142	POSTAL SERVICE
criteria, 4:141	Penalty abatement, 4:145
death, 4:142	POWER OF ATTORNEY
error by IRS, 4:142	
fire, 4:142	Record system of IRS, 8:16
fires, 4:142 , 4:144	PRIORITIES
floods, 4:142 , 4:144	Delinquent notice processing. See index heading
forgetfulness, 4:142	DELINQUENT NOTICE PROCESSING
ignorance of law, 4:142	Liens
illness, 4:142	generally, 3:45 to 3:48
mistake, 4:142	for detailed treatment, see index heading LIENS
natural disasters, 4:142 , 4:144	_
oral advice by IRS, 4:142	PRISONS AND PRISONERS
ordinary business care and prudence, 4:142 partnerships, 4:146	Hardship, basis for reporting accounts uncollectible, 4:109
postal service delay, 4:145	PRIVACY
prior compliance, 4:148	See index heading TAXPAYER PRIVACY
records not obtainable, 4:142	•
service criteria, 4:141	PROBLEM RESOLUTION PROGRAM
sporadic employment patterns, 4:147	See index heading TAXPAYER ADVOCATE
standards, 4:142	PROFESSIONAL ASSOCIATION DUES
statutory exceptions, 4:142	
substantiation, 4:143 , 4:144	Installment agreements, 4:49
undue hardship, 4:142	PROTEST
written advice by IRS, 4:142	Trust fund recovery penalty, 5:78, 5:79
Records not obtainable as reasonable cause to	
abate, 4:142	PUBLIC SERVICES
Sporadic employment patterns as reasonable	Liens, 3:39
cause to abate, 4:147	PYRAMIDING
Standards for abatement, 4:142	Trust fund recovery penalty, 5:114
Statutory exceptions, 4:142	
Substantiation of reasonable cause to abate, 4:143, 4:144	REAL PROPERTY Seizure of residences, 3:115, 3:196 to 3:199,
Substitute for returns, 4:132	3:216, 3:217
30-day appeal period, 4:151	Tax liens, 3:38 to 3:40

REASONABLE CAUSE REFERRALS Penalty abatement Criminal nonfiling, 1:24, 1:27 generally, 4:140 to 4:149 **REFUND SUITS** for detailed treatment, see index heading Generally, 7:35 to 7:41 PENALTIES Forum, **7:36** Trust fund recovery penalty, 5:37, 5:38 Jurisdiction, 7:36 RECEIVABLES Offer, 7:39, 7:40 See index heading ACCOUNTS RECEIVABLE RECORD SYSTEM OF IRS Settlement criteria, 7:39 Generally, 8:1 to 8:42 Statute of limitations, 7:38 Abatements, 8:42 ADP summary, 8:31 REFUNDS OF OVERPAYMENTS Automated collection system (ACS), 8:24 Automatic data processing (ADP), 8:4, 8:31 Case files, 8:26, 8:27 RELEASE Computer system, generally, 8:3 Levv Document locator number, 8:17 Encoder number, 8:39 Endorsement of checks, 8:32 Integrated data retrieval system (IDRS) generally, 3:71 to 3:76 generally, 8:7 to 8:9 for detailed treatment, see index heading Seized property, 3:228 to 3:230 INTEGRATED DATA RETRIEVAL SYSTEM (IDRS) Manual remittance processing system (RPS), RESIDENCES 8:35 to 8:38 Master files, 8:5 National computer center transcripts, 8:21 SYSTEM (RRPS) Optical character reader/remittance processing Record system of IRS, 8:37 system (OCR/RPS), 8:33, 8:34 Payment tracers, 8:41 RETAIL PURCHASES Privacy Act rights, 8:28, 8:29, 8:30 Liens. 3:35 Residual remittance processing system (RRPS), RETIREMENT PLANS 8:37 Returns, securing, 8:25 Securing documents, 8:1, 8:2 **RPING** Service centers, 8:6 Status codes, 8:20 SALE OF SEIZED ASSETS Tax account codes, 8:19 Generally, 3:231 to 3:243 Trace ID numbers, 8:38 Accounting, 3:248 Tracers. 8:41 Transaction codes, 8:18 Certificate of sale, 3:237 Trust fund recovery penalty disclosure, 8:2 Unit ledger cards, 8:22 RECORDING INTERVIEWS Defects in seizure, 3:232

Taxpayer rights, 4:84

RECORDS

Penalty abatement, 4:142 Sale of seized assets, 3:247 to 3:249 System of IRS records. See index heading RECORD SYSTEM OF IRS

Acceptance of offers in compromise, 6:73

REDEMPTION OF PROPERTY

Generally, 3:238, 3:244 to 3:246

Payment of tax liability, 7:37 Reduction of tax liability, 7:41

Investigation of nonfilers, 1:22 Suits for. See index heading REFUND SUITS

generally, 3:176 to 3:181 for detailed treatment, see index heading LEVY for detailed treatment, see index heading LIENS

Seizure, 3:115, 3:196 to 3:199, 3:216, 3:217

RESIDUAL REMITTANCE PROCESSING

See index heading Pension Plans

Integrated data retrieval system (IDRS), 8:16

Advertising sale, 3:225 to 3:227

Condition of title and property, 3:233 Corporate shareholder's purchase, 3:241

Failure to reach minimum bid, 3:236

Friendly bidder, 3:239

Notice of encumbrances, 3:234

Notice of sale, 7:50 Process of, **3:235**

Record of, 3:247 to 3:249

Redemption of property, 3:238, 3:244 to 3:246

Report of, **3:246** Residences, 7:52

Revised sale methods, 3:243

SERVICE CAMPUSES SALE OF SEIZED ASSETS—Cont'd Setting aside IRS sale, 7:51 Delinquent notice processing Spouse's purchase, 3:240 generally, 2:10 to 2:14 Title suits. See index heading TITLE SUITS for detailed treatment, see index heading DELIN-Uniform asset disposal mechanism, 3:242 QUENT NOTICE PROCESSING Voiding IRS sales, 7:49 SERVICE CENTERS **SATISFACTION** Delinquent notice processing Liens, 3:7 generally, 2:3 to 2:9 **SECURITIES** for detailed treatment, see index heading DELIN-QUENT NOTICE PROCESSING Liens, 3:33 Record system of IRS, 8:6 SECURITY INTERESTS SERVICE OF PROCESS Installment agreements, 4:49 Liens, 3:44, 3:49 Seizure documents, 3:194 **SEIZURES SHIFTING LIENS** Generally, 3:110 to 3:116, 3:191 to 3:258 Generally, 3:59, 3:61 Approval SMALL BUSINESS/SELF-EMPLOYED generally, 3:111, 3:192 DIVISION (SB/SE) entering private areas, 3:204 Delinquent notice processing, 2:47, 2:50 residential seizure, 3:198, 3:199 Fast track mediation, 4:8 to 4:11 Automated collection, 3:113 Business assets, 3:116, 3:199, 3:201 SMALL DOLLAR CASES Consent to enter private areas, 3:204 Delinquent notice processing, 2:11 Cooperation, 3:215 Damages actions, 7:44, 7:45 Determining private areas, 3:205 Integrated data retrieval system (IDRS), 8:12 Exemptions, 3:195, 4:92 SOCIAL SECURITY BENEFITS Forcible rescue, 3:214 Levy, 3:169 Hindering seizure, 3:213 to 3:215 Inventory of seized property, 3:211 SPECIAL ESTATE TAX LIEN Judicial review, 3:202 Generally, 3:57 to 3:65 No equity seizures, 3:210 For detailed treatment, see index heading LIENS Notice absent, 3:28 Prior law, 3:112 **SPOUSES** Private areas, 3:203 to 3:207 Liens Release of seized property, 3:228 to 3:230 generally, 3:90 to 3:105 Residences, 3:115, 3:196 to 3:199, 3:216, 3:217, for detailed treatment, see index heading LIENS Offers in compromise, **6:44 to 6:46, 6:75** Safeguarding seized property, 3:212 Purchase at sale of seized assets, 3:240 Sale of seized assets generally, 3:231 to 3:243 STATE TAX REFUND for detailed treatment, see index heading SALE Levies, 3:121 OF SEIZED ASSETS Scope of seizure authority, 3:193 to 3:202 STATUTE OF LIMITATIONS Service of documents, 3:194 Collection due process hearings, suspension dur-Taking assets, 3:114 ing, **4:21** Tangible business assets, 3:199 Damages actions, **7:9, 7:10** Taxpayer rights Installment agreements, 4:57 exemptions, 4:92 Threats, 3:214 generally, **3:8 to 3:12** Trade or business, 3:218, 3:219 for detailed treatment, see index heading LIENS Writ of entry, 3:208, 3:209 Refund suits, 7:38 SEPARATED SPOUSES Trust fund recovery penalty, 5:47 to 5:49 Liens, 3:99 Waiver, 3:9, 4:57, 4:120

STREAMLINED INSTALLMENT TAXPAYER ADVOCATE—Cont'd **AGREEMENTS** Taxpayer assistance orders—Cont'd for detailed treatment, see index heading Generally, 4:24 TAXPAYER ASSISTANCE ORDERS **SUBORDINATION** TAXPAYER ASSISTANCE ORDERS Tax lien, 3:85, 3:86 Generally, 4:101 to 4:105, 4:164 to 4:170 SUBROGATION Appointment of taxpayer advocate, 4:166 Liens, 3:87 Client advocacy, 4:168 Consideration of request for, 4:170 SUBSTITUTE FOR RETURNS Definition of significant hardship, 4:103 Penalties, 4:132 Grounds, 4:101 to 4:104 **SUMMONS** Levy, 3:184, 3:219, 3:255 Generally, 3:259 to 3:277 Procedure, 4:165 Defenses to, 3:276, 3:277 Request procedure, 4:166 First-party summonses Revocation of payment agreement, 4:101 generally, 3:261 to 3:267 Significant hardship, 4:103, 4:167 compliance, 3:266 Statute of limitations extended, 4:105, 4:169 district counsel procedure, 3:264 Taxpayer advocate, 4:164 last chance to avoid enforcement, 3:265 Taxpayer rights generally, 4:87 mail. 3:263 TAXPAYER BILL OF RIGHTS seizure on summons appearance date, 3:267 Generally, 4:80 service. 3:262 Release of lien, 3:71 Notice, 3:270, 3:271, 3:273 Residences, seizure of, 3:197 Reimbursement of expenses, 3:275 Summonses on taxpayer, 3:267 Service, 3:260 Statute of limitations, 5:49 TAXPAYER PRIVACY Third-party summonses Generally, 4:95 to 4:98, 7:86 to 7:89 generally, 3:268 to 3:274 Enhanced privacy rights, 7:89 motion to quash, 3:269 Filing returns, 1:11 notice by taxpayer, 3:270 Inspection, notice of unauthorized, 7:87 notice to taxpayer, 3:271, 3:273 Integrated data retrieval system (IDRS) privacy rights, 3:274 transcripts, right to, 8:23 reviewing, 3:272 Record system of IRS, 8:28, 8:29, 8:30 SUPER PRIORITIES Third party contact, notice of IRS, 7:88, 7:89 Generally, 3:32 to 3:43 TAXPAYER RIGHTS For detailed treatment, see index heading LIENS Generally, 4:80 to 4:92, Gen. App. 1 **SURETIES** Audit reconsideration, 4:156 Trust fund recovery penalty liability, 5:111 Bill of Rights. See index heading TAXPAYER BILL OF RIGHTS TAX COURT RULES Damages actions, 4:89, 4:90 Collection due process proceedings, 7:93 Delinquent notice processing, 2:41, 2:42 TAX EXEMPT AND GOVERNMENT Exemptions from seizures, 4:92 ENTITIES DIVISION (TE/GE) Fair debt collection rights, 4:91 Delinquent notice processing, 2:47, 2:53 Installment agreements, 4:85 TAXPAYER ADVOCATE Math error notices, 4:99 Generally, 4:159 to 4:163 Modification of installment agreements, 4:100 Actions by, 4:162, 4:163 Notification of, 4:81 Criteria for assistance, 4:160 Privacy rights Delinquent notice processing, 2:46 generally, 4:95 to 4:98 Problem Resolution Program, 4:159 for detailed treatment, see index heading Requesting assistance, 4:161 TAXPAYER PRIVACY RIGHTS, 4:95 TO 4:98 Resolution of problems, 4:163 Proposing termination of installment agreements, Taxpayer assistance orders reason for, 4:86 generally, 4:164 to 4:170 Publications, 4:82

false payroll tax returns, filing, 5:117

TITLE SUITS—Cont'd TAXPAYER RIGHTS—Cont'd Recording interviews, 4:84 Service of notice of seizure and sale, 7:50 Release of liens, 4:88, 4:89 Setting aside IRS sale, 7:51 Voiding IRS sales, 7:49 Representation, 4:83 Taxpayer assistance orders **TRANSCRIPTS** generally, 4:101 to 4:105 Integrated data retrieval system (IDRS), 8:10, for detailed treatment, see index heading 8:11, 8:23 TAXPAYER ASSISTANCE ORDERS TRANSPORTATION EXPENSES Termination of installment agreements, 4:85, 4:100 Installment agreements, 4:48 Third party contact, notice of, 4:97, 4:98 TRUST FUND RECOVERY PENALTY Unauthorized disclosure. 4:96 Generally, 5:1 to 5:140 TELEPHONE COLLECTIONS Accountants' responsibility, **5:15** Accrued interest and penalties, 5:63 Delinquent notice processing generally, 2:15 to 2:19 Alter ego, 5:106 Appeals, 5:48, 5:83 to 5:86 for detailed treatment, see index heading DELIN-QUENT NOTICE PROCESSING Application of payments generally, 5:50, 5:51 TELEPHONE EXPENSES accrued interest and penalties, 5:63 Installment agreements, 4:49 computation of penalty, 5:62 TENANCY BY ENTIRETY direction of payments. Direction of payments, Exempt status under state law does not bind below federal collector, 3:108 tax only, 5:64 Liens, generally, 3:106 to 3:109 Attorneys. responsibility, 5:15 Transfer to spouse, 3:109 Authority, 5:11 Badges of fraud, 5:101 THIRD PARTIES Bankruptcy, 5:57 to 5:60, 7:61 Summons Belief that trust fund taxes fully paid, 5:41 generally, 3:268 to 3:274 Bulk of debtor's property transferred, 5:101 for detailed treatment, see index heading sum-Certified mail protest, 5:79 Check signing authority, 5:12, 5:18, 5:19, 5:24 Taxpayer's right to notice of contact, 4:97, 4:98, Codes for designated payments, 5:55 7:88, 7:89 Computation, 5:61 to 5:64 Trust fund recovery penalty liability. See index Conference, appeals, 5:84 heading TRUST FUND RECOVERY PENALTY Consideration for transfer, 5:101 Wrongful seizure actions, 7:45 Contemporaneous direction of payments, 5:54 **THREATS** Contribution right, 5:14 Seizure, 3:214 Corporate officers generally, 5:7, 5:11 TIME avoiding liability, 5:16 Appeal of collection due process (CDP) hearing, check signing, 5:18, 5:19 3:22 investigation of responsibility, 5:25 Collection due process proceedings, timeliness of presidents, 5:17 equivalent hearing requests, 3:23 Creditors, 5:20 Delinquency checks, 1:9 Criminal enforcement Filing returns, 1:1 generally, 5:112 to 5:140 Writ of entry, 3:209 cash payment to employees, 5:116 **TITLE SUITS** embezzlement, 5:136 Generally, 7:46 to 7:54 employer pocketing employee payroll tax Deed validity, 7:47 withholdings, 5:129 Inequitable conveyance, 7:53 failing to collect payroll taxes, 5:118 Jurisdiction, 7:46 failing to file payroll tax returns, 5:117 Practitioner's review of documents, 7:48 failing to pay employment taxes, 5:120, 5:121, Release of erroneous lien, 7:54 5:123 to 5:128, 5:133, 5:137, 5:138

Residential sale, 7:52

RUST FUND RECOVERY PENALTY	TRUST FUND RECOVERY PENALTY
—Cont'd	—Cont'd
Criminal enforcement—Cont'd	Fraudulent conveyances—Cont'd
illegal immigrants, hiring, 5:118	not in usual course of business, 5:101
leasing employees, 5:115	possession retained, 5:101
pyramiding, 5:114	relationship between parties, 5:101
schemes to avoid payment of employment tax,	reservation of interest, 5:101
5:113, 5:131, 5:132	statutory transferee liability, 5:92 to 5:94
tax fraud, 5:119, 5:122, 5:135, 5:139, 5:140	time of, 5:103
unapproved cancer remedies and tax evasion,	Illegal immigrants, hiring, 5:118
5:134	Illness, 5:39
under-the-table payroll scheme, 5:131	Information gathering, 5:69 , 5:70
Deduction of payments on penalty, 5:82	Insolvency of transferor, 5:101
Defense tactics	Interviews with potentially responsible persons,
generally, 5:76 to 5:82	5:66
deduction of payments on penalty, 5:82	Investigations
failure to protest, 5:81	generally, 5:23 to 5:28
protest, 5:78 , 5:79	check signing authority, 5:24
securing IRS file, 5:80	corporate officers, 5:25
third party responsible, 5:77	information gathering, 5:69 , 5:70
Designated payments, 5:53, 5:55	interviews with potentially responsible
Direction of payments	persons, 5:66
generally, 5:52 to 5:60	meeting participation, 5:67
bankruptcy, 5:57 to 5:60	outward indicators of responsibility, 5:27
codes for designated payments, 5:55	responsibility. Investigation of responsibility,
contemporaneous direction, 5:54	above
deposits designated, 5:55	shotgun approach, 5:28
designated payments, 5:53, 5:55	supplement IRS form, 5:68
involuntary payments, 5:56	tax return signatures, 5:26
prebankruptcy payments, 5:58	techniques, 5:65 to 5:68
voluntary payments, 5:56	willfulness, 5:43 to 5:46
Disclosure, 5:22, 8:2	Involuntary payments, 5:56
Disregarded entities, special rules for, 5:3	Judicial stay, 7:29, 7:30
Embezzlement, 5:35 , 5:136	Judicial transferee liability, 5:95 to 5:97
Enforcement, Criminal enforcement, below	Knowledge, 5:33, 5:34
Equity, fraud in, 5:98 , 5:99	Lack of funds, 5:40
Estoppel, 5:75	Lack of knowledge, 5:33
Evil motive for transfer, 5:99	Law, fraud in, 5:98, 5:99
Fact, fraud in, 5:100 to 5:102	Leasing employees, 5:115
Failure to protest, 5:81	Lender liability, 5:87 to 5:90
False payroll tax returns, filing, 5:117	Liability requirements, 5:4 , 5:5
Fiduciary liability, 5:107 to 5:110	Litigation hazards, 5:85
Fraud, criminal enforcement, 5:119, 5:122,	Mail protest, 5:79
5:135, 5:139, 5:140	Meeting participation, 5:67
Fraudulent conveyances	Multiple assessment liability, 5:5
generally, 5:91 to 5:103	Multiple persons, 5:13 , 5:14
badges of fraud, 5:101	Nature, 5:1
bulk of debtor's property, 5:101	Negligence, 5:36
consideration lacking, 5:101	Nominees' liability, 5:104 to 5:106
equity, fraud in, 5:98, 5:99	Notice to taxpayer, 5:72 to 5:74
evil motive, 5:99	Offers in compromise, corporate trust fund
fact, fraud in, 5:100 to 5:102	liabilities, 6:58
insolvency of transferor, 5:101	Oral presentations on behalf of client, 5:70
judicial transferee liability, 5:95 to 5:97	Payment plan signature, 5:45
law, fraud in, 5:98, 5:99	Personal fault shown, 5:30, 5:31

Possession retained, 5:101 Prebankruptcy payments, 5:58 Protest, 5:78, 5:79 Public information requirements, 5:42 Purpose, 5:1 Pyramiding, 5:114 Reasonable cause, 5:37, 5:38 Reckless disregard of known risks, 5:32, 5:36 Recommending assertion of, 5:71 to 5:75 Reconsideration after notice to taxpayer, 5:74 Relationship between parties to transfer, 5:101 Responsibility generally, 5:6 to 5:28 accountants, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferce liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. F	TRUST FUND RECOVERY PENALTY —Cont'd	TRUST FUND RECOVERY PENALTY —Cont'd
Prebankruptcy payments, 5:58 Protest, 5:78, 5:79 Protest, 5:78, 5:79 Public information requirements, 5:42 Purpose, 5:11 Reasonable cause, 5:37, 5:38 Reckless disregard of known risks, 5:32, 5:36 Recommending assertion of, 5:71 to 5:75 Reconsideration after notice to taxpayer, 5:74 Relationship between parties to transfer, 5:101 Reservation of interest by transferor, 5:101 Responsibility generally, 5:6 to 5:28 accountants, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers, Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigation of, 5:43 to 5:46 lack of knowledge, 5:33 negligence, 5:36 personal fault shown, 5:30, 5:31 public information requirements, 5:42 reasonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 reasonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 reasonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 reasonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 reasonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 reasonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 reckless disregard of known risks, 5:32, 5:36 reasonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 reasonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 reasonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 reckless disregard of known risks, 5:32, 5:36 responsibility proving, 5:44 return preparation, 5:44 rtmOD TRANSCRIPTS Integrated data retrieval system (IDRS), 8:10, 8:11 UNEMPLOYMENT Hardship, basis for reporting accounts uncollectible, 4:109 UNIFORM ASSET DISPOSAL MECHANISM Levy, 3:242 UNION DUES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGES Levy Gardian reported data retrieval system (IDRS), 8:10, 8:11 UNEMPLOYMENT Hardship, basis for reporting accounts uncollectible, 4:109 UNIT LEDGER CARDS Filing not		
Protest, 5:78, 5:79 Public information requirements, 5:42 Purpose, 5:1 Pyramiding, 5:114 Reasonable cause, 5:37, 5:38 Reckless disregard of known risks, 5:32, 5:36 Recommending assertion of, 5:71 to 5:75 Reconsideration after notice to taxpayer, 5:74 Relationship between parties to transfer, 5:101 Responsibility generally, 5:6 to 5:28 accountants, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 statuto of limitations, 5:47 Statutory transfered liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:110 randulent conveyances to. Fraudulent conveyances, above lender liability, 5:110 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:33 Ilack of knowledge, 5:33 negligence, 5:36 payment plan signature, 5:45 personal fault shown, 5:30, 5:51 personal fault shown, 5:30, 5:51 personal fault shown, 5:30, 5:54 presonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 responsibility proving, 5:44 subsequent knowledge, 5:34 TXMOD TRANSCRIPTS Integrated dat retrieval system (IDRS), 8:10, 8:11 UNEMPLOYMENT Hardship, basis for reporting accounts uncollectible, 4:109 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WACES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Installment agreements. See index heading Installment agreements. See index heading Installment agreements. See index heading Ins		
Public information requirements, 5:42 Purpose, 5:1 Pyramiding, 5:114 Reasonable cause, 5:37, 5:38 Reckless disregard of known risks, 5:32, 5:36 Recommending assertion of, 5:71 to 5:75 Reconsideration after notice to taxpayer, 5:74 Relationship between parties to transfer, 5:101 Responsibility generally, 5:6 to 5:28 accountants, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:49 Statutory transferee liability, 5:92 to 5:94 Statutory transferee liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:111 Time of transfer, 5:106 surery liability, 5:111 Time of transfer, 5:100 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:33 lack of knowledge, 5:33 negligence, 5:36 payment plan signature, 5:42 personal fault shown, 5:30, 5:31 public information requirements, 5:42 personal fault shown, 5:30, 5:31 public information requirements, 5:42 reasonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 responsibility proving, 5:46 return preparation, 5:44 TXMOD TRANSCRIPTS Integrated data retrieval system (IDRS), 8:10, 8:11 UNEMPLOYMENT Hardship, basis for reporting accounts uncollectible, 4:109 UNITOLEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLIMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis		
Purpose, 5:1 Pyramiding, 5:114 Reasonable cause, 5:37, 5:38 Reckless disregard of known risks, 5:32, 5:36 Reckless disregard of known risks, 5:32, 5:36 Reconsideration after notice to taxpayer, 5:74 Relationship between parties to transfer, 5:101 Resproation of interest by transferor, 5:101 Responsibility generally, 5:6 to 5:28 accountants, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary board members, 5:26 Hird darties Walter Early withdrawal tax, 3:166 Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WaGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading LEVY WACES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading LEVY WALTER Hardship, basis for reporting accounts uncollectible, 4:109 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109		lack of knowledge, 5:33
Pyramiding, 5:114 Reasonable cause, 5:37, 5:38 Reckless disregard of known risks, 5:32, 5:36 Recommending assertion of, 5:71 to 5:75 Reconsideration after notice to taxpayer, 5:74 Relationship between parties to transfer, 5:101 Responsibility generally, 5:6 to 5:28 accountants, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers, Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations, Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:99 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signature, 5:45 personal fault shown, 5:30, 5:31 public information requirements, 5:42 reasonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 responsibility proving, 5:46 return preparation, 5:44 TXMOD TRANSCRIPTS Integrated data retrieval system (IDRS), 8:10, 8:11 UNEMPLOYMENT Hardship, basis for reporting accounts uncollectible, 4:109 UNIFORM ASSET DISPOSAL MECHANISM Levy, 3:242 UNION DUES Installment agreements, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 5:71 to 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:335 Trust fund recovery penalty		negligence, 5:36
Reckless disregard of known risks, 5:32, 5:36 Recommending assertion of; 5:71 to 5:75 Reconsideration after notice to taxpayer, 5:74 Relationship between parties to transfer, 5:101 Responsibility generally, 5:6 to 5:28 accountants, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surery liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:117 fraduclent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Reconsider requirements, 5:42 reasonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 retcless disregard of known risks, 5:32, 5:36 return preparation, 5:44 subsequent knowledge, 5:34 TXMOD TRANSCRIPTS Integrate data retrieval system (IDRS), 8:10, 8:11 UNEMPLOYMENT Hardship, basis for reporting accounts uncollectible, 4:109 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreements, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREE		payment plan signature, 5:45
Recommending assertion of, 5:71 to 5:75 Reconsideration after notice to taxpayer, 5:74 Relationship between parties to transfer, 5:101 Reservation of interest by transferor, 5:101 Responsibility generally, 5:6 to 5:28 accountants, 5:15 attorneys, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers, Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transfere liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:110 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 enbezzlement, 5:35 reasonable cause, 5:37, 5:38 reckless disregard of known risks, 5:32, 5:36 responsibility proving, 5:46 return preparation, 5:44 subsequent knowledge, 5:34 STMOD TRANSCRIPTS Integrated data retrieval system (IDRS), 8:10 Return preparation, 5:44 subsequent knowledge, 5:34 SUMOD TRANSCRIPTS Integrated data retrieval system (IDRS), 8:10 Return preparation, 5:44 subsequent knowledge, 5:34 SUMOD TRANSCRIPTS Integrated data retrieval system (IDRS), 8:10 Retorn preparation, 5:44 subsequent knowledge, 5:34 SUMOD TRANSCRIPTS Integrated data retrieval system (IDRS), 8:10 Retorn preparation, 5:44 Sultane data retrieval system (IDRS), 8:10 Retorn preparation, 5:44 Sultane of limitations are reckless disrepantion, 5:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Filling notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinqu	Reasonable cause, 5:37, 5:38	personal fault shown, 5:30, 5:31
Reconsideration after notice to taxpayer, 5:74 Relationship between parties to transfer, 5:101 Reservation of interest by transferor, 5:101 Responsibility generally, 5:6 to 5:28 accountants, 5:15 attorneys, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 wilffulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transfere liability, 5:92 to 5:94 Subsequent Rnowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:107 formal subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:107 fiduciary liability, 5:107 formal subsequent knowledge, 5:34 Summons, 5:47 formal subsequent knowledge, 5:34 UNIFORM ASSET DISPOSAL MECHANISM Levy, 3:242 UNION DUES Installment agreements, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&D DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty	Reckless disregard of known risks, 5:32, 5:36	public information requirements, 5:42
Relationship between parties to transfer, 5:101 Responsibility generally, 5:6 to 5:28 accountants, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:49 Statute of limitations, 5:47 to 5:49 Statute of limitations, 5:47 to 5:49 Statute of limitations, 5:40 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Trust fund recovery penalty	Recommending assertion of, 5:71 to 5:75	
Reservation of interest by transferor, 5:101 Responsibility generally, 5:6 to 5:28 accountants, 5:15 attorneys, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferce liability, 5:92 to 5:94 Subsequent knowledge, 5:34 UNIND NUES Levy, 3:242 UNIND DUES Installment agreements, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filling notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 rust fund recovery penalty		
Responsibility generally, 5:6 to 5:28 accountants, 5:15 attorneys, 5:16 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transfere liability, 5:92 to 5:94 Subsequent knowledge, 5:34 TXMOD TRANSCRIPTS Integrated data retrieval system (IDRS), 8:10, 8:11 UNEMPLOYMENT Hardship, basis for reporting accounts uncollectible, 4:109 UNIT LEDGER CARDS Record system of IRS, 8:22 UNION DUES Installment agreements, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penaltics, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILFULNESS Trust fund recovery penalty		
generally, 5:6 to 5:28 accountants, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 TXMOD TRANSCRIPTS Integrated data retrieval system (IDRS), 8:10, 8:11 UNEMPLOYMENT Hardship, basis for reporting accounts uncollectible, 4:109 UNIFORM ASSET DISPOSAL MECHANISM Levy, 3:242 UNION DUES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penaltics, 4:109 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penaltics, 4:109	· · · · · · · · · · · · · · · · · · ·	
accountants, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transfere liability, 5:92 to 5:94 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Integrated data retrieval system (IDRS), 8:10, 8:11 UNEMPLOYMENT Hardship, basis for reporting accounts uncollectible, 4:109 UNIFORM ASSET DISPOSAL MECHANISM Levy, 3:242 UNION DUES Installment agreements, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penaltes, 4:149 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreements, 4:49 UVILITIES Levy, 3:242 UVIIN DUES Installment agreements, 4:49 UVILITIES Levy, 3:242 UVILITIES Levy, 3:242 UVILITIES Levy, 3:242 UVILITIES Levy, 3:242 UVILITUES Levy, 3:242 UVILITIES Levy, 3:242 UVILITIES Levy, 3:242 UVILITIES Levy, 3:242 UVILITIES Levy, 3:242 UVILITUES		subsequent knowledge, 5:34
accountants, 5:15 authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:107 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Integrated data retrieval system (IDRS), 8:10, 8:11 UNEMPLOYMENT Hardship, basis for reporting accounts uncollectible, 4:109 UNIFORM ASSET DISPOSAL MECHANISM Levy, 3:242 UNION DUES Installment agreements, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT agreements See index heading INSTALLMENT agreeme		TXMOD TRANSCRIPTS
authority, 5:11 check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transfere liability, 5:92 to 5:94 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:811 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35		
check signing, 5:12, 5:18, 5:19 contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:70 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 UNIFORM ASSET DISPOSAL MECHANISM Levy, 3:242 UNION DUES Installment agreements, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Installment agreements. See index he		
contribution right, 5:14 corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Hardship, basis for reporting accounts uncollectible, 4:109 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filling notice of lien against, 3:27 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Installment agreements. See ind		IINEMDI OVMENT
corporate officers. Corporate officers, above creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:117 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreements, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109		
creditors, 5:20 disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances, above lender liability, 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 UNIFORM ASSET DISPOSAL MECHANISM Levy, 3:242 UNION DUES Installment agreements, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 5:49 WILLFULNESS Trust fund recovery penalty		
disclosure of collection efforts, 5:22 investigations. Investigations, above multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:811 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Levy generally, 5:35 Levy generally, 5:41 Evy, 3:242 UNION DUES Installment agreements, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 5:49 Statutory transferee liability, 5:68 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		
investigations. Investigations, above multiple persons, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 UNION DUES Installment agreements, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading LEVY WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		
multiple persons, 5:13, 5:14 ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreements, 4:49 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations suspended during, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations suspended during, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations suspended during, 4:47 Liens, 3:39 WESSELS Filing notice of lien against, 3:27 WAGES Levy generally, 5:104 Statute of limitations suspended during, 5:41 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations of IRS (4:47 Liens, 3:39 WESSELS Filing notice of lien against, 3:27 WAGES Levy generally, 5:29 to 5:46 Installment agreement, criteria for granting, 4:47 Liens, 3:39		Levy, 3:242
ultimate control, 5:10 voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35		UNION DUES
voluntary board members, 5:21 willfulness, 5:46 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 UNIT LEDGER CARDS Record system of IRS, 8:22 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Levy WAIVER Early withdrawal tax, 3:166 Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAIVER Early withdrawal tax, 3:166 Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WELFAE Early withdrawal tax, 3:166 Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WELFAE Early withdrawal tax, 3:166 Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading lienty Investment of the processing against of the processing against of the processing against of the processing against		Installment agreements, 4:49
Record system of IRS, 8:22 Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:49 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Levy WAIVER Early withdrawal tax, 3:166 Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Levy WAIVER Early withdrawal tax, 3:166 Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAIVER Early withdrawal tax, 3:166 Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAIVER Early withdrawal tax, 3:166 Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAIVER Early withdrawal tax, 3:166 Installment agreement, criteria for granting, 4:47 Liens, 3:39		IINIT I EDCED CADDS
Return preparation, 5:44 Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 UTILITIES Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Levy WAIVER Early withdrawal tax, 3:166 Installment agreement, criteria for granting, 4:47 Liens, 3:39 WESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Installment agreements. See index heading Installment agreements, 5:26 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Installment agreements. See index heading Installment agreements.		
Statute of limitations, 5:47 to 5:49 Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Levy WAIVER Early withdrawal tax, 3:166 Installment agreement, criteria for granting, 4:47 Liens, 3:39 WESSELS Filing notice of lien against, 3:27 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Installment agreements. See index heading Installment agreements, criteria for granting, 4:47 Liens, 3:39 WESSELS Filing notice of lien against, 3:27 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Installment agreements.		
Statutory transferee liability, 5:92 to 5:94 Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Levy WAIVER Early withdrawal tax, 3:166 Installment agreement, criteria for granting, 4:47 Liens, 3:39 VESSELS Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penalties, 4:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penalties, 4:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penalties, 4:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading INSTALLMENT AGREEMENTS Penalties, 3:27		-
Subsequent knowledge, 5:34 Summons, statute of limitations suspended during, 5:49 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Levy WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		
Filing notice of lien against, 3:27 Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Filing notice of lien against, 3:27 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading Levy WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty	Subsequent knowledge, 5:34	Liens, 3:39
Supplement IRS form, 5:68 Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 WAGE AND INVESTMENT (W&I) DIVISION Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading LEVY WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		VESSELS
Surety liability, 5:111 Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading LEVY WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		Filing notice of lien against, 3:27
Tax return signatures, 5:26 Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Delinquent notice processing, 2:47, 2:49 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading LEVY WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		WACE AND INVESTMENT (W&I) DIVISION
Third parties defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 WAGES Levy generally, 3:171 to 3:181 for detailed treatment, see index heading LEVY WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		· · · · · · · · · · · · · · · · · · ·
defense tactics, 5:77 fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Levy generally, 3:171 to 3:181 for detailed treatment, see index heading LEVY WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		
fiduciary liability, 5:107 to 5:110 fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 3:171 to 3:181 for detailed treatment, see index heading LEVY WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		
fraudulent conveyances to. Fraudulent conveyances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Fraudulent conveyances to. Fraudulent conveyances, above for detailed treatment, see index heading LEVY WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		3
ances, above lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty	•	
lender liability, 5:87 to 5:90 nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 WAIVER Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		for detailed treatment, see index heading LEVY
nominees, 5:104 to 5:106 surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Early withdrawal tax, 3:166 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		WAIVER
surety liability, 5:111 Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Installment agreements. See index heading INSTALLMENT AGREEMENTS Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		Early withdrawal tax, 3:166
Time of transfer, 5:103 Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Penalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty	•	Installment agreements. See index heading
Ultimate control, 5:10 Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Fenalties, 4:142 Statute of limitations, 3:9, 4:57, 4:120 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		
Voluntary board members, 5:21 Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		
Voluntary payments, 5:56 Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 WELFARE Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty	· · · · · · · · · · · · · · · · · · ·	Statute of limitations, 3:9, 4:57, 4:120
Willfulness generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 Hardship, basis for reporting accounts uncollectible, 4:109 WILLFULNESS Trust fund recovery penalty		WELFARE
generally, 5:29 to 5:46 belief that trust fund taxes fully paid, 5:41 embezzlement, 5:35 belie, 4:109 WILLFULNESS Trust fund recovery penalty	• 1 •	Hardship, basis for reporting accounts uncollect-
belief that trust fund taxes fully paid, 5:41 will will will will belief that trust fund taxes fully paid, 5:41 will will will belief that trust fund taxes fully paid, 5:41 Trust fund recovery penalty		
embezzlement, 5:35 Trust fund recovery penalty		WILLFULNESS
* 1		
illness, 5:39 generally, 5:29 to 5:46	illness, 5:39	generally, 5:29 to 5:46

WILLFULNESS—Cont'd

Trust fund recovery penalty—Cont'd for detailed treatment, see index heading TRUST FUND RECOVERY PENALTY

WITHHOLDING TAXES

Installment agreements, **4:67**, **4:68** Offers in compromise, **6:54** to **6:56**

WITHHOLDING TAXES—Cont'd

Trust fund recovery penalty generally, **5:1 to 5:140** for detailed treatment, see index heading TRUST FUND RECOVERY PENALTY

WRIT OF ENTRY

Seizure, 3:208, 3:209