



INSIGHTS · TAX RESOLUTION

What to do when you get an *IRS notice in the mail.*

A practical guide for Texas taxpayers.

The letter is in your hand. The IRS logo is on the corner. You've already read it twice. What happens in the next two weeks usually matters more than what happened in the years that produced the notice.

Most taxpayers who receive an IRS notice fall into one of two errors. The first is panic — calling the phone number on the notice, paying the assessed amount, or writing back an explanation before reviewing what the IRS actually has on file. The second is silence — setting the letter aside, hoping that the matter will resolve itself, and discovering some months later that a deadline has run and a procedural option has closed.

Neither is the right response. This guide walks through what an IRS notice actually means, what the deadlines on it are doing, what representation changes about the case, and what most taxpayers in trouble get wrong — primarily by hiring the wrong kind of help.

STEP ONE

First, identify *what kind of notice you have*.

Most IRS notices fall into one of three categories. The label on the upper-right corner of the letter — something like CP501, LT11, or Letter 3219 — tells you which.

Collection notices. The IRS believes you owe money and is moving through the steps required to collect it. The sequence usually runs CP14, then CP501, then CP503, then CP504, then LT11 or Letter 1058, escalating from a polite balance-due notice to a Final Notice of Intent to Levy with thirty days to request a Collection Due Process hearing.

Examination notices. The IRS is questioning an item on a return — usually a specific income, deduction, or credit — and proposing a change. CP2000 letters are by far the most common: a third-party report (a 1099, a W-2, a brokerage statement) didn't match what was on your return, and the IRS has done the math its way. Letter 525 and Letter 3219 (or CP3219A) are more serious. The latter is the Statutory Notice of Deficiency, the "90-day letter," and the deadline on it is jurisdictional.

Identity and compliance notices. Letters 4883C, 5071C, and 5447C ask the taxpayer to verify identity before the IRS will process a return. Notices CP2005 and CP2006 confirm that an earlier dispute has resolved.

The category determines what is at stake. A CP14 collection notice and a Letter 3219 deficiency notice both contain a dollar figure and a deadline, but they sit in completely different procedural postures and require completely different responses.

COLLECTION SEQUENCE

The collection notices run on *a calendar of their own*.

If the notice you received is a collection notice, it sits in a sequence that runs on a

calendar the IRS controls. The agency gives the taxpayer approximately twenty-one days to respond to each notice. After internal processing time, the next notice issues. In normal operations, that means approximately five weeks between notices, with the CP504-to-LT11 step running slightly longer.

Some cases compress this timeline — particularly when there is prior collection history with the IRS or when the underlying assessment was made through the audit process. But the typical taxpayer who receives a CP14 has approximately four to five months before the LT11 / Letter 1058 lands and the 30-day CDP window begins.

FIGURE 1 · ESCALATING IRS COLLECTION CHAIN

Escalating IRS Collection Chain.

Six steps from balance-due notice to levy. Roughly five weeks between each.



Total CP14 → LT11: **approximately 4 to 5 months** in normal IRS operations.
After LT11, the 30-day CDP window is jurisdictional and tight.

Some cases skip steps. Prior collection history can compress the timeline significantly.

The IRS gives 21 days to respond between notices, plus internal processing time. The CP504 to LT11 step varies most.

STEP TWO

The deadlines matter *more than the facts*.

The IRS works on a calendar, not on the merits.

This is the most consequential thing for a taxpayer to understand, and the one most consistently misunderstood. The merits of your case — whether the IRS calculated the liability correctly, whether the third-party 1099 was wrong, whether the deduction you claimed was legitimate — those merits do not pause when a deadline passes. The deadline runs whether or not you are correct on the underlying facts.

Three deadlines are not waivable.

The 90-day letter. From the date printed on a Statutory Notice of Deficiency (Letter 3219 or CP3219A), the taxpayer has 90 days to file a petition in the United States Tax Court. If

mechanics of the case change immediately.

The IRS is required to route communications through counsel of record. The revenue officer who was leaving voicemails on the taxpayer's cell phone must now contact the attorney. Collection actions that were moving on the IRS's standard timeline slow — not because the debt has vanished, but because the agency's procedures require additional administrative steps when a representative is involved, and because the attorney can request additional time, file protective objections, raise procedural defenses, and route disputes through the proper channels rather than the standard automated escalation.

Two clarifications matter here.

First, "slows" is the right verb. The representation does not stop collection. The IRS is a federal agency operating under statutory authority, and a taxpayer's debt does not disappear because counsel has appeared. What changes is the velocity and the venue — the case slows and moves into channels where a competent advocate can be heard.

Second, only certain practitioners can hold a Form 2848. Treasury Circular 230 limits Form 2848 authority to attorneys, certified public accountants, and enrolled agents. The "tax resolution specialist," the "senior tax analyst," the "case manager" — these are titles used by national tax-relief firms in their marketing. They are not credentials recognized by the IRS for representation purposes. If the person managing your case cannot personally sign a Form 2848, they cannot represent you before the IRS.

THE NATIONAL TAX-RELIEF MODEL

Why the firms advertising on television *aren't the answer.*

The advertising is hard to miss. The pitch is "free consultation," and the consultation is, in fact, free.

The consultation is also a sales call.

The person on the phone is an intake representative, generally working from a script and a commission structure. They do not hold a CAF number with the IRS. They do not have a PTIN. They do not have access to the Practitioner Priority Service line. They have not pulled your IRS transcripts. They cannot see your IRS file. What they can do is take down a story, quote a fee, and route you to a contract.

The actual representation work, when it happens, is done by a licensed practitioner inside the firm. But that practitioner is not the person who quoted the fee, often is not the person assigned to follow your case day-to-day, and in many cases is handling a caseload measured in the hundreds. This is not a fraud — these are licensed firms that do, in fact, employ licensed practitioners. It is a volume model. The volume model is the

wrong fit for any taxpayer whose case requires senior judgment, who has criminal exposure to evaluate, whose case might end up in U.S. Tax Court, or who simply wants to know that the attorney handling the matter is the same person signing the filings.

ATTORNEY VS. EA VS. CPA

Why a tax attorney *specifically*.

Attorneys, certified public accountants, and enrolled agents are all authorized to represent taxpayers in administrative matters before the IRS. For many cases — straightforward installment agreements, basic penalty abatements, returns-only audits — any of those three is sufficient.

Three capabilities are exclusive to a licensed attorney.

Tax Court litigation. Only an attorney admitted to the United States Tax Court can file a petition contesting a Statutory Notice of Deficiency. If a case has any chance of ending in Tax Court — and Statutory Notices, Appeals disputes, and certain refund cases all carry that possibility — the attorney needs to be involved before the procedural posture forces the decision.

Attorney-client privilege. Every communication between a client and a licensed attorney on tax strategy is privileged. The narrower federally-recognized CPA-client privilege does exist, but it is more easily defeated, does not extend to all the matters an attorney privilege covers, and does not apply at all in criminal matters. Privilege matters most when criminal exposure is in the picture, but it matters in any case where strategy discussions, calculation alternatives, and litigation positioning are being worked out.

Criminal-exposure analysis. Most tax cases are civil. Some are not. The line between a large civil case and a referral to the Criminal Investigation Division is one that an experienced tax attorney watches for from the first transcript review. An EA or CPA may not recognize the markers in time; some have an institutional incentive not to look for them at all.

The right professional depends on the case. For many, an Enrolled Agent or a CPA is appropriate. For cases involving litigation potential, privilege, or criminal exposure — and for taxpayers who simply want the licensed attorney signing the filings to be the same person handling the matter — a tax attorney is the correct choice from day one.

FIGURE 3 · WHO CAN DO WHAT

Practitioner authority.

	ATTORNEY	CPA	EA
Administrative IRS representation	●	●	●
Hold a Form 2848 (Circular 230)	●	●	●
U.S. Tax Court petition	●	○	○
Full attorney-client privilege	●	<i>partial</i>	○
Criminal-exposure analysis	●	○	○

For administrative IRS matters, any of the three credentials suffices. Three capabilities are exclusive to a licensed attorney.

PRACTICAL SEQUENCE

What to do *this week*.

If you have just received an IRS notice and there is no active levy or wage garnishment in motion, this is the practical sequence.

Today. Photograph or scan every page of the notice, including the envelope showing the postmark date. Keep the original. The postmark and the date printed on the letter together establish the start of any statutory deadline that may apply.

This week. Gather any prior IRS notices on the same matter, copies of your last three years' filed returns, and the W-2 and 1099 records for the year in question. Do not call the phone number on the notice yet. Do not pay the assessed amount yet. Do not write a letter explaining what happened yet.

The reason for the "do not" list is simple: anything you say to the IRS becomes part of the record, and many notices contain calculation errors or assert liabilities the taxpayer does not actually owe. A response written before a transcript review is a response written without information. The IRS has the information. The taxpayer often does not.

The actual next step is a transcript pull. The IRS maintains an account transcript for every taxpayer and every year, and the transcript shows exactly what the IRS believes — every assessment, every penalty, every payment, every notice, and every deadline the agency has calendared against the taxpayer. *A notice tells you one thing the IRS is doing. A transcript tells you what the IRS really thinks.*

ENTRY PRODUCT

The *\$105 Transcript Analysis*.

Lozano Legal Advisors offers a flat-fee Transcript Analysis as the firm's entry product. The work is straightforward: a Form 2848 is filed, the transcripts are pulled, and a Texas tax attorney produces a written analysis of what the transcripts show — every year, every assessment, every penalty, every applicable deadline, with specific recommendations for the available paths forward.

The deliverable is a document. It is the client's to keep, to share with another professional for a second opinion, or to act on however the client chooses. Most analyses are delivered within two to three business days of engagement, depending on IRS system availability.

The fee is \$105, credited toward representation if the firm is engaged for the full matter.

For active enforcement — an in-progress levy, an active wage garnishment, or a sub-30-day deadline on a Statutory Notice or CDP letter — the form-and-wait approach is not the right one. Call directly at (214) 531-3014.

[Request a Transcript Analysis](#)

A NOTE ON THIS FIRM

Who is signing *the filings*.

Lozano Legal Advisors PLLC is a single-attorney Dallas firm. Norris Lozano is a licensed Texas attorney with 30+ years in practice, admitted to the State Bar of Texas, the United States Tax Court, and the United States District Court for the Northern District of Texas. He spent eighteen years as a Downtown Dallas law partner representing the largest financial institutions in Texas, served as Chief Executive Officer and General Counsel of the Portland Family of Funds (which secured \$180 million in New Markets Tax Credits from the U.S. Treasury and closed transactions exceeding \$1.1 billion), and was a Harvard University Innovations in American Government Award semifinalist. His practice covers tax resolution and litigation, federal tax credit finance, estate planning, real estate, business entities, and corporate and partnership work.

The firm is built on AI-augmented infrastructure that Norris designs and operates himself. The document work and deadline tracking that slows other firms is handled by the system — and the attorney's time goes where attorney judgment is actually required: strategy, review, negotiation, and signature. When you call this number, the licensed Texas tax attorney is the person who answers.



Lozano Legal Advisors PLLC

A Texas law firm for complex work without the complexity of a big firm.

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