

LAW 14,689/2023 EXPECTED TO ENTER INTO FORCE WITH NEW WORDING AFTER NATIONAL CONGRESS OVERTURNED PART OF THE VETOES ON BILL 2,384/2023

NATIONAL CONGRESS OVERTURNS PART OF THE VETOES ON THE CARF BILL (PL 2,384/2023)



On December 14, 2023, in a joint session, Brazil's National Congress **rejected the presidential vetoes on the provisions on the early settlement of guarantees as well as the limitation of fines in tax proceedings to 100% of the tax liabilities calculated.** The provisions of PL 2,384/2023 that correspond to the overturned vetoes will be forwarded to Brazil's president **for enactment within 48 hours** or, in his absence, to the Senate's president or vice-president.



LIMITATION OF FINES TO 100% OF TAX LIABILITIES



Cancellation of the tax assessment fine amounts, **whether or not registered as overdue federal tax liabilities**, exceeding 100% of the tax liabilities amount.



**Immediate and official** cancellation, by the Attorney General's Office of the National Treasury ("PGFN"), of the active debt regarding the fine amount that exceeds 100% of the tax liabilities.



**Possibility of refunding** the amount that has been settled and that exceeds 100% by taxpayers, via lawsuit.



Limitation **applicable to fines included in debt refinancing programs** for outstanding payment installments.



PROHIBITION ON THE EARLY SETTLEMENT OF GUARANTEES

Bank and insurance guarantees can only be settled, in full or in part, once a decision on the merits has become final and unappealable against the taxpayer.

QUESTIONS? CONTACT US!



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