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Written by a team of eight tax practitioners and law professors, Federal Tax Practice and Procedure is the ideal guidebook for understanding how disputes with the IRS arise and are resolved. Its 18...

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Federal Taxation Practice and Procedure (12th Edition) provides a clear explanation of the organization, structure and processes involved in IRS practice. A favorite in practice and procedure classes because of its clear descriptions and logical presentation, it is a top reference for practitioners as well. The book patiently covers the basics, the complexities and the details with plenty of real-life illustrations and examples. All the latest IRS structural changes and developments are explained, and the book helpfully includes reproductions of official letters, forms and notices used by the IRS.

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This new 12th Edition reflects the latest statutory, regulatory and case developments along with changes in IRS operations and processes. Included right in place are special end-of-chapter problems for those using the book as a text or training tool. The authors continue the practice of carefully and concisely explaining the workings of the IRS, so that the reader gets a clear sense of how things work on a practical level. This comprehensive guide discusses the administrative structure of the IRS, ethical duties of the practitioner, preparer penalties, and the statute of limitations. The Service's procedure in determining, reviewing, litigating and collecting tax deficiencies is described, and the roles of all the key groups within the IRS are covered. Also included are a discussion of related criminal investigations and the use of the IRS summons. The indirect method of proof is also covered. The book's helpful Appendix contains the key sections from the Statement of Procedural Rules adopted by the Treasury Department to govern the internal administration and functioning of the IRS. CONTENTS: The book reflects the substantial experience and resourcefulness of its authors in highly successful IRS pr

A clear explanation of the organization, structure and processes involved in IRS practice. The latest IRS developments are explained and reproductions of official letters, forms and notices used by the IRS are included. Includes plenty of real-life illustrations and examples.

Written by a team of eight tax practitioners and law professors, Federal Tax Practice and Procedure is the ideal guidebook for understanding how disputes with the IRS arise and are resolved. Its 18 chapters are divided into four parts: (1) The Basics: Chapters examine the reform of the IRS during the 1990's and its current structure and organization. Also covered: income tax withholding, calculating estimated taxes, making tax payments, preparing returns and making elections. (2) Examination of the Tax Return and Assessment of a Deficiency: Chapters explore IRS examination of tax returns and the assessment of tax deficiencies, reaching settlements with the IRS, statutes of limitation on assessment, practicing before the IRS, and obtaining IRS guidance. (3) Remedies Available to the Taxpayer: Chapters on Tax Court litigation, refunds and appeals. (4) IRS Tools for Obtaining Unpaid Taxes and Penalizing Taxpayers: Chapters cover collection of taxes, liens and levies, interest, the fraud penalty, civil penalties other than fraud, and criminal penalties and procedure. The treatise is filled with hypothetical examples where our authors show you how to perform difficult tax calculations and how to apply tax rules and principles in everyday practice. The authors have also included scores of tax planning tips, commentaries and observations on the law, and caveats for the cautious practitioner. Federal Tax Practice and Procedure is the perfect companion to Matthew

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Bender's two-volume treatise, *Tax Controversies -- Audits, Investigations and Trials*, which provides in-depth coverage of tax fraud, both civil and criminal. Also includes subject matter index, and tables of Internal Revenue Code sections, Treasury Regulations and IRS rulings and pronouncements.

Experienced tax lawyers, those new to tax law, and businesspeople will each benefit from this accessible book that provides a nuts-and-bolts approach in solving specific problems that arise in everyday tax practice. The author, who is both a CPA and an attorney, provides insight and practical tips on all aspects of federal tax controversies, from audit (examination) through the administrative appeals process and subsequent litigation, and on to collection (enforcement) issues. Presenting the book's material in a useful outline format, the author deals primarily with the Internal Revenue Code sections 6000 to 9000."

Written by a professor with experience on all sides of federal tax disputes, *Fundamentals of Federal Tax Procedure and Enforcement* provides students with a guide through the thicket of rules and procedures that comprise the federal tax system, helping them make sense of a seemingly random collection of dense rules and seemingly inaccessible entities governing federal tax procedure and enforcement. For ease of teaching and learning, Professor Madison breaks down the rules and concepts of tax procedures and enforcement into four distinct parts based on the decisions and determinations the parties to a tax dispute must make, as well as the rules affecting those decisions. Professors and students will benefit from: A new perspective on how to present the tax system to students A bird's eye view of the tax system while drilling deep into essential topics A standalone resource—all necessary statutes and regulations within the text Probing notes and questions after each case that help put the cases in context A balance of technical language—less technical than the highly technical language used by tax practitioners, but more technical than law students have yet been exposed to in their legal studies

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