

Tax Controversies: Practice and Procedure



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Description :

To view or download the 2023 Supplement to this book, click here. This casebook teaches the mechanics of tax procedure, while stimulating students to think about the broader issues that underlie its structural framework. Tax Controversies: Practice and Procedure begins with an overview of civil tax procedure and an in-depth discussion of the federal tax gap and the many approaches to closing it. Several of the next chapters focus on stages in the chronology of a typical tax controversy, from examination through eventual litigation. Two chapters focus on tax research and representing tax clients, and another chapter addresses ethics issues in tax cases. An underlying theme8213the extent to which the current procedural rules encourage or discourage voluntary compliance with the federal tax system8213runs throughout the book. 8226 Suitable for J.D. or LL.M. students, or for use in a tax clinic. 8226 Each casebook chapter includes theory questions and a set of fact-based problems to encourage strategic thinking. Several chapters include optional drafting problems. 8226 Teacher's Manual provides detailed answers to the problem sets, suggests approaches to the material, and highlights topics more suitable for an advanced course. 8226 This edition is thoroughly updated to reflect developments in the law since the previous edition. 8226 Separate Documents Volume, Tax Controversies: Statutes, Regulations, and Other Materials, is also available.

Tax Controversies Pract Procedures

Roman Wölfel



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