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It provides analysis, commentary, and strategies for all types of practitioners who have dealings with the IRS.

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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. 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. 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 reflects the substantial experience and resourcefulness of its authors in highly successful IRS practices. Chapters are as follows: Organization of the IRS Chapter 2: Ethical Responsibilities Chapter 4: Examination of Returns Chapter 5: Large Case Audits Chapter 6: Partnership Audit Procedures Chapter 9: Penalties and Interest Chapter Statute of Limitations on Assessment Chapter The Appeals Office Chapter Assessment Procedure Chapter The Collection Process Chapter Claims for Refund Chapter Private Rulings and Determination Letters Chapter International Tax Procedure Chapter Criminal Tax Procedure Chapter End-of-chapter questions present practical problems, and are designed to help the student determine what to do in the situations presented.

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