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Chapter 2

Tax Research, Practice, and Procedure

SUMMARY OF CHAPTER

Tax practice involves the preparation of tax returns and representation of clients before the audit or appellate divisions of the Internal Revenue Service. To become a competent professional, skilled in these three functional areas of tax practice, it is necessary to be proficient in the art of tax research.

The tax specialist needs to understand the organizational structure of the IRS and its administrative procedures to provide fully informed tax consulting services to taxpayers involved in disputes with the IRS. Thus, this chapter includes a discussion of the internal organization of the IRS, the functions of the various administrative groups, the rules relating to practice before the IRS, and the procedures for examination of returns, including correspondence examinations, office examinations, and field examinations.

Tax Reference Materials

¶2001 Classification of Materials

Tax reference materials are usually classified as primary “authoritative” sources or secondary “reference” sources. Primary source materials include the Internal Revenue Code (Statutory Authority), Treasury Regulations and Internal Revenue Service Rulings (Administrative Authority), and the various decisions of the trial courts and the appellate courts (Judicial Authority).

Secondary reference materials consist primarily of the various loose-leaf tax reference services. Additional secondary materials include periodicals, textbooks and treatises, published papers from tax institutes and symposia, newsletters, and, more recently, the various computer-assisted research services.

Primary Source Materials

¶2021 Statutory Authority

The authority of the U.S. government to raise revenue through a federal income tax is derived from the Sixteenth Amendment to the Constitution, enacted in 1913. In subsequent years, with the growing complexity of the tax law, the multitude of revenue acts were codified into Title 26 of the United States Code, known as the Internal Revenue Code of

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S Ashworth



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Federal Tax Compliance Manual CCH Incorporated, 2007-12 CCH's Federal Tax Compliance Manual formerly published under title CCH Federal Tax Manual is a comprehensive source for explanations practical examples filled in tax return forms key tax facts federal tax tables and other information that will assist practitioners in accurately complete federal tax returns This convenient and authoritative resource covers the preparation of tax returns and tax compliance providing helpful guidance on the basic federal tax rules and forms affecting individuals and businesses The rules applied to everyday business and personal income tax decisions are thoroughly discussed with special emphasis on how these issues should be handled on the return Among the topics covered are Individuals Corporations Pass Through Entities Income Deductions and Credits Tax Accounting Rules Dividends Interest Rents and Royalties Retirement Plans and Distributions Depreciation Sales and Exchanges Lectures, Discussions, Questions and Answers New York University. Institute on Federal Taxation, 1953

Federal Tax Study Manual (2008) Edward C. Foth, 2007-03 CCH's Federal Tax Study Manual is designed to enhance learning and improve comprehension for students of federal tax Clear and concise summaries along with hundreds of review questions and answers help students understand the complexities of today's tax laws Designed as an extra aid for students using CCH's industry leading tax textbooks the Study Manual highlights and reinforces the key tax concepts presented in CCH's Federal Tax Course CCH's Federal Taxation Comprehensive Topics and CCH's Federal Taxation Basic Principles The CCH Federal Tax Study Manual provides students with an approach that combines self study with programmed learning Throughout the Study Manual main concepts are presented in a concise yet thorough fashion allowing students to focus on and apply pertinent information Chapter by chapter summaries and easy to read outlines highlight the in-depth textbook explanations Objective questions and problems with solutions provided are structured to help **Federal Tax Course (2009)** Linda M. Johnson, CCH Tax Law Editors, 2008 *Catalog of Copyright Entries. Third Series* Library of Congress. Copyright Office, 1959 Includes Part 1 Number 2 Books and Pamphlets Including Serials and Contributions to Periodicals July December

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the mammoth Treasury regulations that explain the IRS's position prescribe operational rules and provide the mechanics for compliance with the Internal Revenue Code **ABA Journal** ,1957-02 The ABA Journal serves the legal profession Qualified recipients are lawyers and judges law students law librarians and associate members of the American Bar Association

Taxes ,1976 Includes bibliographical material and court decisions *New Accountant* ,1985 *Standard Federal Tax Service* ,1944 The Accounting Review William Andrew Paton,1960 Includes section Reviews **United States Master Tax Guide** ,2009 **CCH Federal Tax Weekly** ,2006 **Bowker's Law Books and Serials in Print** ,1998

Whispering the Strategies of Language: An Mental Journey through **Cch Federal Taxation 13 Solutions Manual**

In a digitally-driven world where screens reign supreme and quick conversation drowns out the subtleties of language, the profound techniques and psychological nuances concealed within words frequently get unheard. However, nestled within the pages of **Cch Federal Taxation 13 Solutions Manual** a charming literary value sporting with natural emotions, lies an extraordinary journey waiting to be undertaken. Composed by a skilled wordsmith, this charming opus attracts visitors on an introspective trip, lightly unraveling the veiled truths and profound impact resonating within the fabric of every word. Within the psychological depths of the emotional review, we can embark upon a heartfelt exploration of the book's core themes, dissect its charming writing type, and fail to the powerful resonance it evokes strong within the recesses of readers' hearts.

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