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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.

52021 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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Searle, Peter L. Shillingsburg

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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 indepth textbook explanations Objective questions and problems with solutions provided are structured to h **Laboratory Manual for the** Detection of Poisons and Powerful Drugs Wilhelm Autenrieth, William Homer Warren, 1928 **Illinois Strategy to** Control Drug and Violent Crime DIANE Publishing Company, 1995-10 Includes detailed data on Illinois drug availability violent crime emergent issues firearms violent crime domestic violence gangs heroin alcohol abuse etc Current efforts impact focuses on law enforcement prosecution probation prison 22 charts tables maps A Manual of the Chemistry of the Carbon Compounds Carl Schorlemmer, 1874 A Manual of Dyeing Edmund Knecht, Richard Loewenthal, Christopher Rawson, 1910 Manual of Chemical Technology Johannes Rudolf Wagner, 1897 A Manual of materia medica and pharmacology David Marvel Reynolds Culbreth, 1906 A Manual of Materia Medica and Pharmacology. Compromising All Organic and Inorganic Drugs... David Marvel Reynolds Culbreth, 1917 Catalog of Copyright Entries. Third Series Library of Congress. Copyright Office, 1977 **Textbook Solutions---taken from CCH Federal Taxation 2003: Basic Principles:** Voice, Text, Hypertext Raimonda Modiano, Leroy F. Searle, Peter L. Instructor's Manual ,2002 Shillingsburg, 2016-06-01 Voice Text Hypertext illustrates brilliantly why interest in textual studies has grown so dramatically in recent years For the distinguished authors of these essays a text is more than a document or material object It is a cultural event a matrix of decisions an intricate cultural practice that may focus on religious traditions modern underground literary movements poetic invention or the irreducible complexity of cultural politics Drawing from classical Roman and Indian to modern European traditions the volume makes clear that to study a text is to study a culture It also demonstrates the essential importance of heightened textual awareness for contemporary cultural studies and critical theory and indeed for any discipline that studies human culture Catalog of Copyright Entries. Part 1. [B] Group 2. Pamphlets, Etc. New Series Library of Congress. Copyright Office, 1941 Laboratory Manual of Physiological Chemistry Meyer Bodansky, Marion Spencer Fay, 1928 A Preliminary Assessment of the National Crime Information Center and the Computerized **Criminal History System** United States. Congress. Office of Technology Assessment, 1978 U.S. Tax Shelter Industry United States. Congress. Senate. Committee on Governmental Affairs. Permanent Subcommittee on Investigations, 2004

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