

Tax Appeals & Litigation Strategies ©

Objective: This half day course provides an overview of the life of a civil tax controversy from audit through the IRS appeals process, subsequent tax court litigation, and strategies for dealing with any resulting liabilities.

What you will learn:

- Hot audit issues the IRS is pursuing
- How to prepare the client for the audit process
- Preserving substantive defenses from audit through trial
- Knowing when and where to raise any defenses and their impact on the burden of proof
- Factors the advisor must consider in advising the client on whether to go straight to appeals or Tax Court
- Maximizing discovery opportunities during each phase
- Negotiation strategies the practitioner should employ at each level of the tax controversy process
- Strategies the practitioner should employ for winning the case during the stipulation process
- Briefing a winning case
- Collection alternatives such as offers in compromise or installment agreements
- Whether bankruptcy is ever an alternative

CPE: 4 hours

Level: Overview

Category: Tax

Prerequisites: None

Instructor: Vivian Hoard