

Tax Appeals & Litigation Strategies ©

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

What you will learn:

- Hot audit issues the IRS is currently 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 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

Code: TALS