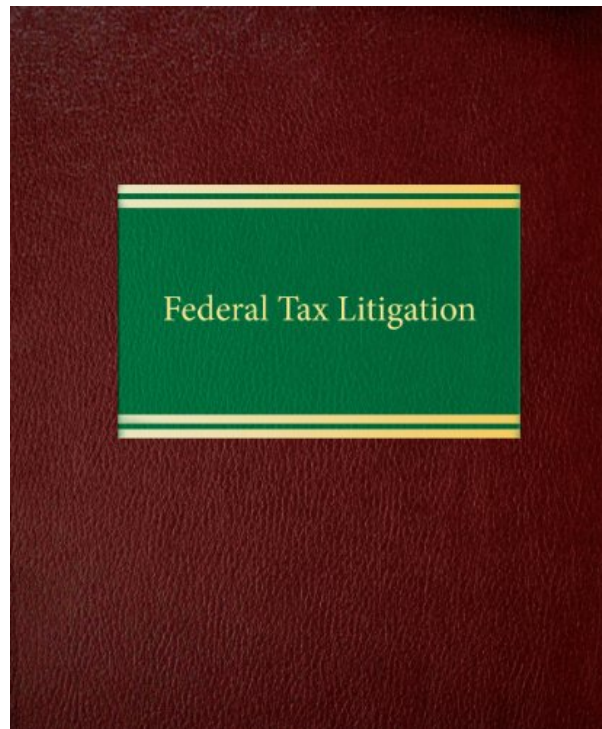
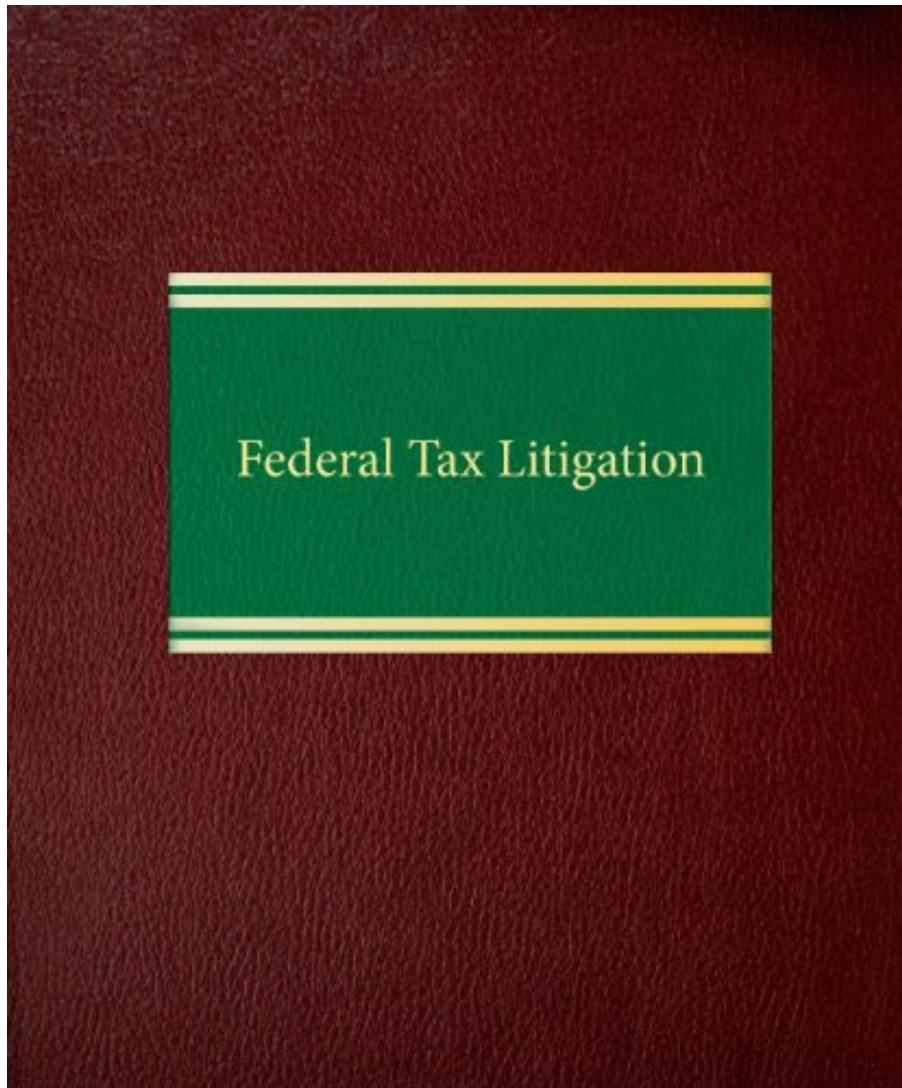


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Susan A. Berson, a former senior trial attorney with the U.S. Department of Justice, Tax Division, is a partner with www.banktaxlaw.com, based in the Kansas City area. Ms. Berson has litigated tax cases before judges and juries in numerous federal district and bankruptcy courts. The recipient of an Outstanding Attorney Award from the Justice Department, and voted Best of the Bar by her peers, she has also written and lectured at seminars about litigating cases against the government.

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Tax lawyers across the country have at least one thing in common — the feeling of frustration when trying to figure out the hows and whys of IRS action or inaction. Federal Tax Litigation helps to lift the veil of mystery. Written by a former litigator for the Tax Division of the Justice Department, this book offers an insider's perspective on both the legal issues and practical considerations involved in handling a federal tax controversy. It presents a comprehensive approach to tax litigation, covering audit, appeal, problems resolution office, collection and subsequent judicial proceedings involving the Justice Department. You'll find coverage of every aspect of federal tax disputes, including: handling tax controversies at all levels of the IRS; alternative dispute resolution procedures; asserting the “innocent spouse defense”; representing a client who is the target of the Criminal Investigation Division; refuting jeopardy assessments; suits against the federal government for overpayments; establishing “reasonable cause” for failure to pay; fighting government suits for recovery of erroneous refunds; recovery of damages for improper government disclosures of tax return information; taxpayer recovery of attorney's fees; tax debts that may be discharged in bankruptcy; grand jury matters; and more. Whether you are experienced or new to the field, Federal Tax Litigation will show you what to expect and help you advise clients in difficult situations. Don't miss this essential guide used in government, private practice and law schools across the country!

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