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TAX LITIGATION

Federal tax controversies, whether in the individual, corporate or estate setting, are governed by a maze of Internal Revenue Code provisions, Treasury Regulations and procedural rules which can be overwhelming to the most knowledgeable taxpayer. Effective and timely advice, provided by experienced counsel, is crucial when the IRS comes to call. Unforgiving procedural deadlines and admissions made by the taxpayer without guidance can close off opportunities to defend one's position or secure the refund sought.

Most tax disputes do not require a legal battle with the Service in order to be resolved. The reorganization of the IRS under the IRS Restructuring and Reform Act of 1998, along with the enactment of the Taxpayer Bill of Rights, provides an improved framework for reaching a prompt resolution of most claims. Nonetheless, the importance of skilled advocacy, combined with experience in tax litigation and appeal procedures, cannot be understated. Three attorneys at The Rack Law Firm, P.C. hold advanced tax law degrees and have handled matters before IRS administrative bodies and in the U.S. Tax Court. As a team, the Firm handles tax matters on a daily basis, in keeping with the special legal practice areas to which we have limited ourselves as a commitment to serving our clients.

NOTICE - This information is not legal advice or counsel absent an extant attorney-client relationship with the recipient; this information does not create an attorney-client relationship. Seek legal counsel before taking any action on the matters referenced above.