



Resource Guide: Tax Controversies: Practicing before the IRS and the U.S. Tax Court

Background Materials

Marvin A Chirelstein, *Federal Income Taxation : A Law Student's Guide To The Leading Cases And Concepts* (Thomson Reuters, 2012). Law Library Call No.: **KF6369 .C43 2012**

John K. McNulty, *Federal Income Taxation Of Individuals In A Nutshell* (West, 2012). Law Library Call No.: **KF6369.3 M3 2012**

Camilla E. Watson *Tax Procedure And Tax Fraud In A Nutshell* (West, 2012). Law Library Call No.: **KF6324.Z9 M67 2011**

Stephen Utz, *Inside Tax Law: What Matters and Why* (Wolters Kluwer Law & Business, 2011). Law Library Call No.: **KF6289 .U89 2011**

Richard A. Levine, Theodore D. Peyser, and David A. Weintraub, *Tax Court Litigation* (Tax Management, 2009). Law Library Call No.: **KF6289.A1 T35 (2009)**

David M. Richardson, Jerome Borison, and Steve Johnson, *Civil Tax Procedure* (LexisNexis, 2008). Law Library Call No.: **KF6300 .R53 2008**

David A. Schmuddee (ed), *Federal Tax Liens* (American Bar Association, 2003). Law Library Call No.: **KF6316 .S36 2001**

Gerald A Kafka, *Litigation of Federal Civil Tax Controversies* (Warren, Gorham & Lamont, 1997). Law Library Call No.: **CRS-2009-DSP-0533 (1997) (Available on line through law library catalog).**

Selected Law Review Articles

Michael James Bommarito and Jillian See, *An Empirical Survey of the Population of United States Tax Court Written Decisions* (March 20, 2011). 30 VIRGINIA TAX REVIEW 523 (2011). Also available at SSRN: <http://ssrn.com/abstract=1441007>

Gerald A. Kafka, *Choice Of Forum In Federal Civil Tax Litigation (Part 1)*(2011): http://www.lw.com/upload/pubContent/pdf/pub3980_1.pdf

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Gerald A. Kafka, *Choice Of Forum In Federal Civil Tax Litigation (Part 2)*(2011):
http://files.ali-aba.org/thumbs/datastorage/lacidoirep/articles/PTXL1105_Kafka_thumb.pdf

Michael W. Hatfield, *The Ethics of Tax Lawyering: An Introduction* (August 2, 2010). Available at SSRN: <http://ssrn.com/abstract=1652301>

John B. Snyder, *Dispositions Unsettled: What Tax Court Procedure Can Teach Us About Federal Civil Procedure*, 36 OHIO N.U. L. REV. 359 (2010).

Charles P. Rettig and Kathryn Keneally, *Basic IRS Audit Techniques: Taxpayer Interviews* (September 1, 2010). *Journal of Tax Practice & Procedure*, p. 19, August-September 2010. Available at SSRN: <http://ssrn.com/abstract=1877303>

Leandra Lederman, *Tax Appeal: A Proposal to Make the United States Tax Court More Judicial*, 85 WASH. U. L. REV. 1195 (2008).

Christopher M. Pietruszkiewicz, *Conflating Standards Of Review In The Tax Court: A Lesson In Ambiguity*, 44 HOUS. L. REV. 1337 (2008).

Leandra Lederman and Warren B. Hrungr, *Do Attorneys Do Their Clients Justice? An Empirical Study of Lawyers' Effects on Tax Court Litigation Outcomes*, 40 WAKE FOREST LAW REVIEW 1235 (2006). Also available at SSRN: <http://ssrn.com/abstract=899461>

Mary Ann Cohen, *How To Read Tax Court Opinions*, 1 HOUS. BUS. & TAX L. J. 1 (2001)

Helpful Tax Websites

IRS Resources For Professionals:
<http://www.irs.gov/taxpros/index.html?navmenu=menu1>

U.S. Tax Court:
<http://www.ustaxcourt.gov/>

U.S. Tax Court Rules of Procedure and Practice:
<http://www.ustaxcourt.gov/notice.htm>

U.S. Tax Court Docket Search:
<http://www.ustaxcourt.gov/docket.htm>