Effectively Representing Your Client Before The “New” IRS

Third Edition

A Practical Manual for the Tax Practitioner with Sample Correspondence and Forms

A comprehensive, easy-to-use handbook for the general tax practitioner. This three volume/CD-ROM set, including sample correspondence and forms, and hundreds of useful practice tips, is an excellent resource for attorneys, accountants, and enrolled agents in all stages of representation before the IRS in controversy matters, including exam, appeals, Tax Court, refund actions, and collection matters.

Originally written by more than a dozen of the most experienced tax controversy lawyers in the U.S. and edited and updated by Professor Jerome Borison, University of Denver College of Law, it provides a detailed roadmap through the maze of controversy practice. Of significant value to the practitioner is the text’s incorporation of the INTERNAL REVENUE MANUAL into the narrative. Nowhere else is the web-based Manual so usefully presented.

Each year, the Tax Section presents a Pro Bono Award to someone who has devoted time and energy to pro bono representation, particularly representation of low-income taxpayers.

This year the award is presented to a member who has excelled in her personal efforts on behalf of low income taxpayers and has inspired the efforts of those around her.

Our award winner has chaired the Tax Section’s Low Income Taxpayer Committee, and teaches not one, but two sections of a low income taxpayer clinic at her law school, doubling the number of students able to participate, increasing the number of individuals who can be assisted by the clinic, and ensuring continuity of care for those who are.

When her locale was identified for an EITC pilot effort by the IRS, she provided organization and assistance to community leaders, developed materials to navigate the issues, and provided a web-based assistance program in English and Spanish.

Our award winner practices holistic lawyering for her low income clients. She helped create a coalition (“Take Your Money Connecticut”) of local community groups—social, non-profit, government, and business—that provides financial education together with free tax return preparation.

Our award winner was nominated by her students, to whom she has taught holistic lawyering. Her students refer to their memos as having been “Dianatized” when her holistic comments pepper their work product.

Finally, our award winner’s students have particularly noted her high ethical standards and the time and effort she devotes to imbuing in them those same high ethical standards.

For all of these reasons, Diana Leyden is this year’s recipient of the American Bar Association Section of Taxation’s Pro Bono Award.

Please join me in congratulating Diana Leyden.