

Bloomberg Quotes Charles Ruchelman: IRS Will Move Quickly to Summonses Under New Document Request Procedures

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Bloomberg BNA's Daily Tax Report spoke with Charles M. Ruchelman concerning the Internal Revenue Service's new guidelines for information document requests during audits. For the complete article, please visit *Bloomberg BNA's* website.

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The problem practitioners are seeing is that before this, there weren't these strict deadlines that would require the IRS to kick it to the summons step," Charles Ruchelman, a tax controversy attorney with Caplin & Drysdale told Bloomberg BNA Dec. 12. Ruchelman also spoke on the panel.

Prior to this, Ruchelman said there was more give-and-take between the taxpayer representatives and agents in the field. "There was always communication," he said. "Now it appears if the taxpayer hasn't complied, there is very little discretion from the agent's perspective as to whether to go the summons route or not, or to work more to extract the information."

Attorneys

Charles M. Ruchelman

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