

Charles Ruchelman Comments on *Taylor Lohmeyer Case*

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Law360 Tax Authority

Federal courts will grapple with complex tax cases for the remainder of the year, from tax refund ownership among affiliated groups to the economic substance doctrine, whether an IRS summons can get a law firm's client information and who gets a domestic manufacturing deduction.

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The tax bar will be watching the case because it may represent a new trend in IRS investigations, Charles M. Ruchelman, a member at Caplin & Drysdale, told *Law360*.

"It's a tactic that violates fundamental principles of protection and confidentiality in the U.S. legal system," he said. "A client should be able to speak candidly with an attorney without fear that the communications will wind up in the hands of the government."

For the full article, please visit *Law360's* website (subscription required).

Excerpt taken from the article "4 Federal Tax Case to Watch in the 2nd Half of 2019" by Amy Lee Rosen for Law360 Tax Authority.

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