

## TAX RESEARCH MEMO TEMPLATE

Quite Tax Firm  
Cypress Texas  
05/11/2024

### Relevant Facts

Robert Jones recently provided his expertise as an expert witness in a case that was heard by the U.S. Tax Court. The taxpayer involved in the case is now seeking reimbursement for both Jones' fees and the expenses incurred by her attorney during the presentation of the case. Jones' billing rate for this engagement is \$500 per hour, which is considered the prevailing market rate for similar services in his city. Additionally, the taxpayer is eligible for reimbursement of out-of-pocket expenses, such as auto mileage and computer charges. The question at hand is the extent to which the taxpayer will be able to recover Jones' fee.

### Specific Issues

What portion of the taxpayer's money will be reimbursed in relation to Jones' fee?

### Conclusions

The Internal Revenue Code §7430 (c ) grants the IRS and federal courts the power to award court cost recovery to taxpayers who successfully prevail against the United States. Attorney's fees and taxpayer expert witness fees can be reimbursed under certain circumstances. The requirements for the 7430 are outlined as follows: the taxpayer must not have unreasonably prolonged the litigation, must have pursued the case through the IRS administrative appeals, must have substantially prevailed in Tax Court, and must have a net worth that does not exceed two million. To qualify for fee recovery, the IRS must fail to demonstrate that its position was substantially justified, and the taxpayer must meet requirements such as not unduly prolonging litigation and having a net worth not exceeding two million dollars. The taxpayer must formally request reimbursement within 30 days or at the conclusion of the proceedings. If all requirements are met, the taxpayer can recover reasonable fee costs, typically capped at \$125 per hour for court-related services according to §7430(c)(1)(B)(iii).

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# Tax Research

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## **Table of Contents Tax Research**

1. Understanding the eBook Tax Research
  - The Rise of Digital Reading Tax Research
  - Advantages of eBooks Over Traditional Books
2. Identifying Tax Research
  - Exploring Different Genres
  - Considering Fiction vs. Non-Fiction
  - Determining Your Reading Goals
3. Choosing the Right eBook Platform
  - Popular eBook Platforms
  - Features to Look for in an Tax Research
  - User-Friendly Interface
4. Exploring eBook Recommendations from Tax Research
  - Personalized Recommendations
  - Tax Research User Reviews and Ratings
  - Tax Research and Bestseller Lists
5. Accessing Tax Research Free and Paid eBooks
  - Tax Research Public Domain eBooks
  - Tax Research eBook Subscription Services
  - Tax Research Budget-Friendly Options

6. Navigating Tax Research eBook Formats
  - ePub, PDF, MOBI, and More
  - Tax Research Compatibility with Devices
  - Tax Research Enhanced eBook Features
7. Enhancing Your Reading Experience
  - Adjustable Fonts and Text Sizes of Tax Research
  - Highlighting and Note-Taking Tax Research
  - Interactive Elements Tax Research
8. Staying Engaged with Tax Research
  - Joining Online Reading Communities
  - Participating in Virtual Book Clubs
  - Following Authors and Publishers Tax Research
9. Balancing eBooks and Physical Books Tax Research
  - Benefits of a Digital Library
  - Creating a Diverse Reading Collection Tax Research
10. Overcoming Reading Challenges
  - Dealing with Digital Eye Strain
  - Minimizing Distractions
  - Managing Screen Time
11. Cultivating a Reading Routine Tax Research
  - Setting Reading Goals Tax Research
  - Carving Out Dedicated Reading Time
12. Sourcing Reliable Information of Tax Research
  - Fact-Checking eBook Content of Tax Research
  - Distinguishing Credible Sources
13. Promoting Lifelong Learning
  - Utilizing eBooks for Skill Development
  - Exploring Educational eBooks
14. Embracing eBook Trends
  - Integration of Multimedia Elements

- Interactive and Gamified eBooks

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