

Contact

Houston

1200 Smith Street, Suite 1400
Houston, Texas 77002-4310
Tel: 713.658.1818
Fax: 713.658.2553

Atlanta

191 Peachtree Street, N.E.,
Forty-Sixth Floor
Atlanta, Georgia 30303
Tel: 404.659.1410
Fax: 404.659.1852

Philadelphia

300 Conshohocken State Road
Suite 570
West Conshohocken, PA 19428
Tel: 610.772.2300
Fax: 610.772.2305

San Antonio

112 East Pecan Street, Suite
1450
San Antonio, Texas 78205
Tel: 210.253.8383
Fax: 210.253.8384

The IRS and Rules About Rules with Jeff Luechtefeld, Emerging Litigation Podcast

Jeff Luechtefelds recent podcast interview, The IRS and Rules About Rules with Jeff Luechtefeld, on the Emerging Litigation Podcast

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In a podcast interview that aired on August 18, 2023, Atlanta-based Shareholder Jeff Luechtefeld joined Tom Hagy, host of the Emerging Litigation Podcast, to discuss the historical non-compliance of the Administrative Procedure Act by the IRS and the resulting impact on tax litigation.

When the IRS fully complies with the APA and fully follows the notice-and-comment procedure, I think that is a net positive for taxpayers. And so, I think that also means that non-compliance is likely a net negative, explains Luechtefeld. This is an important issue really for anybody who has a significant dispute with the IRS, especially if there is some possibility that the IRS hasnt complied with the notice-and-comment procedures.

To listen to the full podcast, [click here](#).