

# [Guide use corresponding numbers from issue(s) section](https://assignbuster.com/guide-use-corresponding-numbers-from-issues-section/)

[](https://assignbuster.com/)[Law](https://assignbuster.com/essay-subjects/law/)

Guideto Prepare File Memos and Client LettersResearchMemoPurpose: To summarize the facts, issues and conclusions of the research topic to enablea review of the research activities by the researcher’s superiors and to bereference material for subsequent examinations of the research topic for futuresimilar situations.

Attachmentsto memos should only be the most important and pertinent primary sourcesupporting documents. Utilizetemplate that includes the firm name, location, date field, headings, and researcherand reviewer name fields for the memo. The standard headings include:-         Facts-         Issue(s)-         Conclusion-         Authorities-         Analysisand Summary-         Actionsto Be Taken, and-         RecommendationsFactssection includes:-         Briefsummarization of relevant facts directly related to the issue(s)-         Includehow facts were obtainedo  Annualclient tax packageo  Face-to-facemeeting on specific dateo  Phonecall on specific dateo  Emailon specific dateIssue(s)section includes:-         Directlyidentify the issue(s) using technical tax termso  Ifmultiple issues, number each one-         Questionor statement format is acceptableConclusionsection includes:-         Directlyand briefly state the conclusion for each issue identifiedo  Ifmultiple issues, use corresponding numbers from Issue(s) section-         Donot include the reason for the conclusion-         Donot include citations for the conclusionAuthoritiessection includes: –         Completecitations for each issue identifiedo  Ifmultiple issues, use corresponding numbers from Issue(s) section-         Citeprimary sources (statutory, administrative and judicial)-         Donot cite secondary sources to support conclusion-         Donot cite IRS Publications to support conclusionNote: If there are 2 or less primary sources, authorities section does not have to be included.

The full citations must beincluded in the Analysis and Summary section. Analysisand Summary section includes:-         Thoroughreview and evaluation of pertinent laws-         Detailedand complete conclusion of each issue identifiedo  Ifmultiple issues, use corresponding numbers from Issue(s) section-         Includeexplanations and justifications for the conclusion reached-         Includecitations within detailed conclusiono  Fullcitations, if required-         Discussstrengths and weaknesses of tax argumentActions toBe Taken section includes:-         Prepareresults with client via client letter-         Schedulea meeting with client to review results, if necessary-         Fileappropriate documentation in client file-         Preparetax return, if return is pending results of issueRecommendationssection includes:-         Adviseclient of any immediate changes required-         Adviseclient of possible tax strategiesClientLetterPurpose: Toprovide a general, plain language conclusion to the client of the issueidentified in a sophisticated and professional manner. The lettershould be prepared in a paragraph format and should not exceed 2 pages, unlessthe issue identified is unusually complex and requires a lengthy explanation. Utilizetemplate that includes the firm name, location, date field, client name andaddress field, and client salutation. 1stParagraph – Objective and Scope of Research:-         Thankthe client for requesting advice on the specific issue-         Providea quick answer to the issueo  Nomore than one sentence per issueo  Ifconclusion is unfavorable, provide a buffer§ Iam sorry to report§ Unfortunately2ndParagraph – General Summary of Results-         Generalizethe sourceso  Courtcaseso  IRSpositiono  TaxCourt position-         Briefexplanation of how the information in these sources directly relates to theresearch issue-         Verybriefly mention next possible courses of actiono  Ifunfavorable, file for litigationo  Iffavorable, tax implications or requirements3rdParagraph – Facts Presented by Client-         Specifythe source facts were obtained fromo  Annualclient tax packageo  Face-to-facemeeting on specific dateo  Phonecall on specific dateo  Emailon specific date-         Summarizethe facts as originally explained by the client4thParagraph – Critical Source of Law Summary-         Providespecific explanation of the justifications behind the conclusion-         Ensureall issues have been addressed-         Ensureconclusions are explicitly stated5thParagraph – Implications of Results-         Specifyconcrete next steps-         Adviseas to appropriate changes that could result in a more favorable outcome6thParagraph – Assumptions and Limitations REQUIRED-         Explicitlystate that conclusions are based on the facts as presented by the client andthe applicable income tax law as of the date of the letter7thParagraph – Closing and Attachments-         Ifneeded, include a reference to any follow-up meetings where letter can bediscussed-         Ifrequested, mention and include any attachments to the letter