

## **Factual Issues**

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It is helpful to understand the skill of a tax attorney in identifying and developing factual issues. A tax attorney identifies, develops and creatively applies factual issues to defend and protect a taxpayer, to reverse an adverse IRS determination or to get a favorable tax settlement.

The IRS will not develop facts that reduce tax liability. The development of factual issues by an experienced tax attorney bears directly on the legal issues and can negate or mitigate tax liability.