Sources of Federal Income Tax Law

Constitution

Corporations - Article I, section 8 (1787) Individuals - 16th Amendment (1913)

Legislation

Internal Revenue Code, 26 U.S.C. Codifies income tax laws on books for decades (individual income tax since 1913) Codifications: 1939, 1954, 1986 Internal Revenue Code of 1986, as amended

Administrative Law

Internal Revenue Service

Rulemaking Regulations (26 C.F.R.)

Guidance

Revenue rulings and revenue procedures Lesser types of rulings

Adjudication

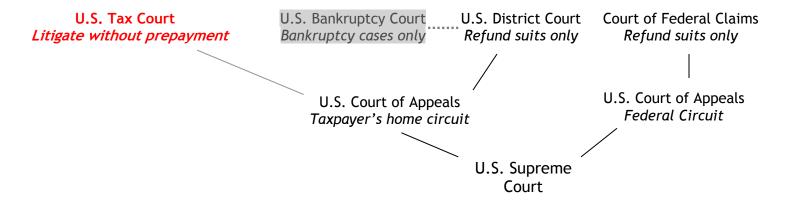
[Withholding/estimated tax] [Annual return (self-assessment) by taxpayer]

IRS examination ("audit") of return
Notice of proposed deficiency ("30-day letter")
Taxpayer protest, administrative appeal *Notice of Deficiency ("90-day letter")*IRS assessment and collection (unless stayed by taxpayer filing petition in Tax Court or filing in

Bankruptcy Court)

Litigation

Federal courts



(Settlement possible at any stage)