



Tax Crimes

John Townsend, Larry Campagna, Steve Johnson, Scott Schumacher

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This new title is one of six releases from the LexisNexis Graduate Tax Series. **Tax Crimes** embodies the dual goals established for the LexisNexis Graduate Tax Series: to provide graduate tax students with a solid foundation in the applicable rules and to enhance their skills in reading and applying complex statutes and regulations. To this end, the Assigned Readings emphasize the Code sections and other rule-based materials, including: the Department of Justice Criminal Tax Manual, the Internal Revenue Manual, the United States Sentencing Guidelines, and statutes governing other crimes which frequently are charged together with tax crimes, such as conspiracy, false statement, bankruptcy fraud, and currency offenses. This book addresses the numerous substantive and procedural issues that arise in the investigation, prosecution, and defense of tax crimes and related offenses. The early chapters of the book map the topography, providing an overview of criminal tax, describing the crimes under the Code and related crimes under other statutes, and developing the elements of and principal defenses to tax crimes. The middle chapters take a "life cycle" approach, tracking the stages of a criminal tax case from investigation to pretrial, trial, post-trial, and sentencing. Subsequent chapters address ancillary issues such as the forfeitures, disabilities, publicity, ethics, and civil tax liability and penalties. The concluding chapter summarizes the course and ties the various topics together with a comprehensive Problem.

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