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These new hires will help the IRS manage the increasing caseload in its multi-year effort to ...

Isaac M. O'Bannon • Jan. 24, 2022



IRS

Department of the Treasury Internal Revenue Service

The Internal Revenue Service's Office of Chief Counsel plans to hire up to 200 additional attorneys to help the agency combat syndicated conservation easements, abusive micro-captive insurance arrangements and other tax schemes.

"Combating abusive tax transactions that threaten to undermine our tax system remains a top priority for our enforcement efforts," said IRS Commissioner Chuck Rettig. "It's critical we work to ensure a fair tax system and adding these new attorneys will help us in on our ongoing efforts in this arena."

These positions will be available around the country, and the IRS encourages

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Promoters have been particularly active developing and marketing tax shelter schemes that purportedly enable taxpayers to avoid paying what they legally owe. These new hires will help the IRS manage the increasing caseload in its multi-year effort to stamp out these abusive schemes and ensure that those participating in them pay the tax they owe plus penalties.

“This is an excellent opportunity for attorneys with experience in litigation, partnership tax law and planning complex transactions to join the Office of Chief Counsel and make a real difference for our tax system,” said Principal Deputy Chief Counsel William M. Paul.

These positions will be available in more than 50 locations, including Washington D.C. Those hired will provide legal advice to IRS professionals as they conduct audits of complex corporate and partnership issues and increasingly sophisticated and abusive transactions. The Chief Counsel office, working closely with IRS and the Treasury Department, provides world-class litigation and substantive tax training for all experience levels.

New hires will work in a variety of areas, including handling cases in the United States Tax Court, as well as serving on trial teams in our largest and most complex trials involving fact and expert witnesses, depositions and multi-week trials. They will also work with the Department of Justice Tax Division, which handles refund cases in district courts and the Court of Federal Claims.

Others hired will serve in the IRS national office with a focus on developing global regulatory solutions to the most sophisticated and abusive transactions and providing highly specialized advice to IRS litigation teams.

Abusive syndicated conservation easement deals remain a major focus for the IRS.

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enforcement. These deals are generally sold to owners of closely held entities. The deals commonly lack many of the necessary attributes of insurance, have excessive premiums, insure highly improbable risks and have no connection to genuine business and insurance needs.

These are just some of the abusive schemes that the new hires will be working on.

Paul noted that there are numerous advantages to joining Chief Counsel. The Office of Chief Counsel has successfully transitioned in response to the Covid-19 Pandemic. Chief Counsel is currently in full telework mode and will have a competitive telework policy going forward.

To learn more about these opportunities, visit [IRS Office of Chief Counsel | IRS Careers](#). The mission of the Office of Chief Counsel is to serve America's taxpayers fairly and with integrity by providing correct and impartial interpretation of the Internal Revenue laws and the highest quality legal advice and representation for the Internal Revenue Service.

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