Table of Contents

June 2014 Circular 230 Revision 1

Who is subject to discipline under Circular 230? 1

Unlicensed Preparers 1

Voluntary Annual Filing Season Program 1

AFTR requirement chart 3

PTIN 4

Consent and Disclosure Rules 5

Confidentiality 7

Circular 230 Overview 8

IRC 6694(a)(2) 9

Selected Circular 230 Rules 11

Client Omission 11

Accuracy 11

Client Records 11

Conflicts of Interest 12

Waiver of Conflict of Interest – Divorce 13

Fees in General 15

Contingent Fees 15

Advertising 16

Negotiation of Taxpayer Checks 16

Best Practices 18

Competence 20

Incompetence and disreputable conduct 20

Procedures to Ensure Compliance 21

Requirements for Written Advice 21

The preparer penalty standards of IRC. Section 6694 22

A Review of IRS Authoritative Guidance 23

Statutory Law 23

Administrative Law 23

Judicial Authority 24

Regulation 24

Revenue Ruling 25

Revenue Procedure 25

Technical Advice Memorandum 25

Notice 25

Announcement 25

Private Letter Ruling 26

IRS National Tax Forum Case Studies 27

Our Case Studies of Ethics Rules 29

IRS Section 6694 and related Regulations 34

IRC Section 6695 35

Penalties under IRC Sec. 6713 36

Regulations Governing Practice before the Internal Revenue Service 41