



## IRS and Tax Dispute Resolution

Our Tax attorneys have extensive experience representing clients in civil and criminal federal tax controversies. The attorneys in our Tax department utilize and retain experts who are former Internal Revenue Service (IRS) agents and accountants; and, in addition to handling tax controversies at the state and local levels, we also routinely represent clients in tax audits and settlements involving the IRS as well as other complex tax controversies in the federal courts. Regardless of the nature of the transaction in question or the circumstances at hand, our sole focus in tax controversy matters is on helping our clients minimize their tax exposure to the greatest extent possible – if not avoid tax liability entirely.

We provide full-service legal representation for federal tax matters such as:

- Bankruptcy protection from collection procedures
- Criminal tax investigations
- Disclosure of offshore accounts
- Employment and withholding tax issues
- Estate and inheritance tax audits and disputes
- Installment agreements
- IRS and state tax audits
- Offers in compromise
- Preparation of comprehensive protests
- Private Letter Rulings
- Settlement agreements
- Tax collection issues
- Tax court litigation