

# STRATEGIC

LAW GROUP PC

Strategic Integrated Planning

## TAX CONTROVERSY PROCESS

Contact us with your tax controversy questions at [taxcontroversy@strategiclawgrouppc.com](mailto:taxcontroversy@strategiclawgrouppc.com) or call toll-free 1-866-657-0246.

Our Tax Controversy Group provides taxpayer's with skilled legal representation throughout all stages of the tax process – from pre-audit through collections. With seasoned tax lawyers and tax professionals guiding, advocating and defending your rights as a taxpayer before the IRS and courts you can expect a zealous and tireless set of advocates whose objective is obtaining the best possible results for you as the taxpayer.

### **Pre-controversy**

Our Tax Controversy Group's tax lawyers provide evaluation, counsel and recommendations to our clients on best accounting, best tax and best legal practices as part of a proactive and preventative pre-controversy program. With the unique combination of transactional and litigation experience, our tax lawyers bring clients a wealth of experience, wisdom and prudent preparatory steps, programs and procedures to assist our clients in pre-controversy planning. With proper planning for potential future audits and controversies, many problems can be avoided or the costs of later handling the controversies can be reduced.

### **Audit Stage**

Our tax lawyers assist client's accounting firms during a tax audit providing invaluable legal counsel regarding such items as accountant privileges, attorney client privileges, IRS summons responses, legal arguments and tax research concerning various tax issues, laws and positions. Our firm's forensic accountants also provide an ability to "internally" audit a client's books and records prior to presentation to the government agencies to evaluate the strengths and weaknesses of the case. Our tax lawyers also directly manage an audit for taxpayers where there is substantial monetary, legal or tax issues at stake. Through experienced and skilled handling of the audit process we can bring audits to a successful conclusion or establish the audit record for purposes of proceeding with protests to Appeals and/or court. With a combination of skilled presentation and zealous advocacy, our tax attorneys are able to obtain positive results for taxpayers in a tax audit.

### **IRS Appeals Protests**

Our tax lawyers routinely step in at the IRS Appeals stage to assist taxpayers with the preparation of a formal protest to appeals and to the subsequent negotiation, argument and resolution of disputed tax deficiencies, interest and penalties. Through proper development of the case, including research of the legal and tax authorities, and presentation of the taxpayer's factual situation in the most favorable light, we are able to successfully resolve most disputed matters at the IRS Appeals level. When necessary, the taxpayer's case can also be successfully positioned to proceed to Court to litigate important or substantive legal or tax issues.

### **Trial and Appellate Experience**

Our tax lawyers bring significant courtroom experience to bear on taxpayer's cases as they proceed to a litigated resolution. We develop a comprehensive trial strategy which includes development of the facts, law, and tax issues pertaining to the taxpayer's case. We also devise a series of steps for potential resolution of the case prior to trial through dispositive pre-trial motions, settlement, mediation and or other agreed upon resolutions. Our tax lawyers are admitted to practice before the United States Tax Courts, United States District Courts, the United States Appellate Courts, State Courts and other governmental tribunals.

### **Collections**

When a tax deficiency is finally agreed to or determined, our firm's tax lawyers assist taxpayers with the collection process to include potential offers in compromise, installment agreements, collection due process hearings, and defense of liens and other enforcement actions.