

PRACTICE CONTACT

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FEDERAL TAX DISPUTE RESOLUTION

We represent a wide variety of clients in all types of federal tax disputes, including income tax, estate tax, various types of excise taxes, and proposed penalties. If a tax liability is ultimately determined, we assist our clients in dealing with collection issues.

Dispute resolution may occur in any of three stages: audit, appeals, and litigation. Typically, our lawyers do not interact directly with revenue agents during an audit. However, when estate tax examiners propose adjustments to an estate or gift tax return as filed, our attorneys often will have frontline involvement in contesting those adjustments. Our attorneys have significant involvement when disputes cannot be resolved at the agent level and the matter is taken to the IRS Appeals Office. We have established excellent relationships with appeals officers throughout Ohio. Finally, we represent our clients in the Tax Court and federal court when a fair resolution cannot be reached at the administrative appeals stage.