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Tax Controversy & Litigation

Tax Controversy & Litigation

Chamberlain Hrdlicka's nationally-recognized Tax Controversy & Litigation Practice is comprised of attorneys experienced in advising and representing taxpayers before federal, state and local taxing authorities and in all federal and state courts in which tax disputes are litigated. Our team includes attorneys who have litigated cases for the United States Department of Justice Tax Division and IRS Office of Chief Counsel, served as IRS Appeals Officers and Revenue Agents, and clerked for the United States Tax Court. Our team also includes attorneys who have CPAs, MBAs, or Masters in Laws in Taxation, or have served in important tax positions in private industry.

What separates a true tax controversy firm from those who profess to handle tax controversies is the combination of many critical elements, including:

- Substantive tax expertise on a wide array of sophisticated tax issues,
- Comprehensive understanding of the nuances of tax procedure and the tax controversy process,
- Extensive knowledge about, and experience dealing with, the IRS, the Department of Justice and state taxing authorities, and
- A proven track record of successfully litigating unresolved tax claims.

Our clients range from the largest multinational corporations to every other conceivable form of business entity, estates, trusts, individuals and nonprofit organizations. Our client engagements cover the full spectrum of substantive tax issues involving income, estate and gift, employment, excise taxes and tax-exempt entities. They arise in all phases of the tax controversy process, from the beginning of the tax audit, to the preparation of tax protests and negotiation with IRS Appeals, to litigation in the United States Tax Court, the Federal District Courts, and the Court of Federal Claims. We also have extensive experience arguing appeals in the United States Courts of Appeals, and the United States Supreme Court. Similarly, at the state level, we represent taxpayers in all phases of the controversy and litigation process.

In criminal tax matters, we represent companies and individuals who are alleged to owe tax or be liable criminally for failure to comply with the tax laws. Representative engagements include defending taxpayers against allegations of failure to report income, fraudulent overstatement of deductions, preparation of false tax returns, failure to collect and pay over employment taxes, and conspiracy to obstruct the collection of taxes.

Tax Controversy & Litigation, *Continued*

Whether we are engaged at the beginning of a controversy, or called in after other attempts at relief have failed, we know how to explore every approach to achieving the best resolution for the client.

Areas of Experience

- Pre-controversy tax advice
- Tax audits
- Administrative appeals
- Internal Investigations
- Alternative Dispute Resolution
- Freedom of Information Act requests and actions
- Summons enforcement actions
- Representation of taxpayers under criminal investigation
- Civil and criminal tax litigation in United States Tax Court, Federal District Courts, Court of Federal Claims, and state courts.
- Appellate advocacy in the United States Court of Appeals, United States Supreme Court, and state courts.
- Employee Retention Tax Credit (ERC and ERTC)

