

Practices

Federal Tax Litigation and Controversy

Domestic and cross-border companies and their owners and officers face increasingly aggressive enforcement and interpretation of tax laws by the federal government. Legal counsel with experience and insight into the strategies and practices of government auditors and lawyers is an essential part of a comprehensive approach in protecting businesses and assets.

Akerman's Tax Litigation and Controversy Practice offers clients significant experience in the resolution of federal tax controversy matters, including a team of former lawyers from the U.S. Department of Justice and the IRS, in addition to Tax Division trial attorneys, former Assistant U.S. Attorneys, and law clerks from the U.S. Tax Court and district courts. Our experience extends to all stages of examination, administrative appeals, and litigation. In addition to litigation, we are also frequently called upon to assist in the mediation of tax controversies.

We have experience representing clients in a wide variety of sectors—including healthcare, medical devices, technology, insurance, financial services, equipment leasing, real estate, and retail—working to resolve matters efficiently and in a manner that achieves the economic objectives of our clients without needlessly impairing ongoing relationships with the Internal Revenue Service (IRS) and other government representatives.

What We Do

- IRS Audits and Appeals

Connect With Us



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Our Team

Related Work

Corporate Tax
Litigation
Tax

- Audit defense for domestic and cross-border corporations, partnerships, LLCs, and their owners, officers, and employees
- Appeals, fast track settlement, and post appeals mediation
- Litigation in all federal courts for civil and criminal tax controversies
 - U.S. Tax Court
 - District and Bankruptcy Courts
 - Circuit Courts of Appeal
- Voluntary disclosures and international tax compliance
 - Offshore Voluntary Disclosure Program
 - Resident and non-resident streamline disclosures
- Transfer pricing
- Income tax, excise tax, payroll tax, estate, and gift taxes
- Change of accounting methods