

TAX LAW

**FEDERAL TAX CONTROVERSY & LITIGATION**

- Representation of individuals, businesses, estates and trusts in federal tax controversy at audit and appeals before federal taxing authorities, including matters involving civil penalties and potential criminal sanctions.
- Representation of individuals and business entities making voluntary disclosures before federal taxing authorities, including disclosures regarding foreign assets and accounts.
- Representation of individuals and business entities facing trust fund penalty liability.