

Tax Disputes & Controversies

Bailey Glasser's tax controversy attorneys are here to help clients navigate disputes with the IRS and state tax authorities against tax-related claims and lawsuits including allegations of tax evasion, fraudulent tax returns, or failure to pay taxes. Our decades of experience vests us with a deep understanding of tax laws, regulations, and compliance issues; a deep knowledge of the procedural and substantive aspects of tax litigation; and the common-sense aspects of knowing how to work with powerful federal and state agencies to protect your interests while seeking to minimize your tax liabilities.

We understand that the prospect of owing more money, facing legal consequences, or undergoing a lengthy and intrusive audit and potentially even litigation is stressful and time-consuming. We will stand with you throughout the process.

The approach we take for each client is based on their unique situation. Our goal is to always endeavor to resolve a client's case at the earliest possible time with the best possible terms, and to develop strong working relationships with the tax authorities at issue to keep the process as smooth and predictable as possible.

Tax controversy and dispute services we provide include:

- Assisting with the filing of delinquent tax returns and related penalties
- Audit representation
- Negotiating offers in compromise and installment agreements
- Appealing audit and collection actions
- Voluntary disclosures (including offshore)
- Assisting in obtaining relief from liens, levies, seizures, and wage garnishments
- Handling federal and state court tax litigation
- Public relations navigation for public-facing companies and individuals
- When matters have a great deal of documentation, we can call upon our cutting-edge Electronically Stored Information Practice Group to assist.

Recent representative matters include:

- Represented a couple with a multi-million-dollar dispute with state taxing authority and successfully resolved the matter through an offer-in-compromise for a fraction of original amount claimed owed by taxing authority

- Represented a client in a Department of Justice (DOJ) Investigation in connection with conservation easements

The tax team also provides valuable tax planning and strategy services. To learn more, please visit [here](#).