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## Tax Controversies

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Our attorneys have substantial experience in handling federal and state tax disputes of all kinds. This ranges from involvement at the audit level, to administrative appeals with the IRS Appeals office and similar state tax authorities, to actual court litigation. We work closely in these matters with our clients' accountants and other advisors. Examples of recent disputes include:

- Deductibility of certain expenses
- Defending corporate officers against personal liability for unpaid payroll and sales taxes
- Defending out-of-state businesses against imposition of state income taxes on grounds of insufficient nexus
- Determination of a partner's gain on sale of a partnership interest
- Disputes involving independent contractor versus employee status
- Innocent spouse relief

Effective tax planning can frequently avoid disputes. When disputes arise, however, we are prepared to defend vigorously the interests of our clients.

### Attorneys

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