Tax Controversy and Litigation

Attorneys

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Mitchell Williams' team of tax lawyers assists clients in resolving high-stakes, complex tax controversies. Businesses entities and individuals work with our team when facing a civil or criminal tax controversy or tax litigation matter with the Internal Revenue Service, the Department of Finance and Administration or a local taxing authority.

Clients benefit from the experience of our tax controversy team. Lead by a former tax litigator for the U.S. Department of Justice, our lawyers work with clients to develop strategic responses and solutions based on our understanding of tax laws and the tax controversy process. We focus on achieving success quickly and privately through the administrative process and serve as a trusted advisor throughout every step of the controversy and litigation process to help obtain favorable, cost-effective outcomes.

Our clients include Arkansas and non-Arkansas based business entities and individuals facing every kind of tax liability. Our experienced team works with clients to navigate the complicated and challenging stages and types of tax matters, including:

- Advise during the planning and development stages of a proposed transaction including drafting and seeking tax opinion letters from taxing authorities
- Negotiate with taxing authorities to resolve matters before they have resulted in an audit
- State and federal voluntary disclosures on a variety of domestic and foreign business and individual tax issues, including offshore accounts, income tax and sales taxes
- State tax nexus examinations and appeals
- Negotiate offers in compromise and installment payment plans including concessions of penalties and interest, where available
- Reestablish payment plans when established plans have defaulted
- Provide administrative audit advice and support by either directly handling the audit or doing so through your accounting team
- Post-audit alternative dispute resolution
- Administrative appeals
- Litigation in county, state, and federal courts including the Tax Court, Federal District Courts, Court of Federal Claims, and appeals to the United States Courts of Appeal and the United States Supreme Court.