

# SERVICES

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## Tax Controversy

The Tax Group's controversy practice includes representation of clients in connection with responding to written inquires and notices, audits, administrative appeals and litigation. Our involvement, both in anticipation of and following the emergence of actual tax controversy, includes consultation and strategy, review of technical issues, factual review and development, communication with the tax authorities, preparation of appeals and representation in litigation. At each applicable stage, we assess the relative positions of the parties to the tax controversy and the level of risk and financial exposure involved in order to assist the client in making informed strategic and business decisions concerning the tax controversy.

We represent clients in matters before the Internal Revenue Service, Michigan Department of Treasury and other state and local administrative authorities and tribunals. Our litigation representation includes appearing at the US Supreme Court, US Courts of Appeals, US Tax Court, Court of Federal Claims, US District and Circuit courts, and various state courts.

We have also represented clients in collection matters with the Internal Revenue Service and various state and local tax authorities. In this regard, our representation includes negotiation of installment agreements, offers in compromise and settlement agreements, requests for penalty abatements and representation in collection due process hearings.

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