

Representative Matters: Tax: Business

- Assisted both individuals and entities with making domestic voluntary disclosures under both IRS and state programs/procedures.
- Represented large area technology and consulting company with overseas operations in contentious audit with IRS LMSB (Large & Mid Size Business) Division where government had issued summons to client and asserted potential tax assessment exceeding \$1 million; audit eventually settled for fraction of original proposed assessment.
- Represented corporate taxpayer in successfully seeking abatement and refund of multiple \$10,000 per year penalties for late filing of IRS information returns for foreign subsidiaries (Form 5471).
- Advised and represented various European based companies in establishing US presence while minimizing extent of US/State/local taxes and transfer pricing issues.