

Our tax controversy practice represents clients in all manners of civil and criminal disputes with federal, state, and local taxing authorities. Whether facing an audit, or managing or reducing past tax liabilities, our lawyers help guide clients through the complex tactics of the taxing authorities to ensure our clients' interests and rights are preserved and asserted so they pay no more in tax than legally required.

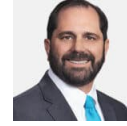
Our tax controversy lawyers:

- Represent individuals and businesses of all sizes (C Corps, S Corps, and partnerships) in IRS audits;
- Protect taxpayers in federal and state criminal tax investigations and litigation;
- Prosecute and defend "Innocent Spouse" claims;
- Reduce taxpayer liabilities through requests for abatement of penalties;
- Advocate for Colorado businesses in state and local sales, use, occupational privilege, and business personal property tax audits;
- Representing taxpayers in litigation with taxing authorities in the U.S. Tax Court, United States District Court, and Colorado state courts;
- Helping non-compliant taxpayers (i.e.- non-filers) get back into compliance, including through the IRS's regular and offshore voluntary disclosure programs (including the current Streamlined Offshore Submission and Delinquent International Return Submission procedures);
- Resolving tax liens and levies/garnishments; and
- Negotiating past-due federal and state tax liabilities through Offers in Compromise, Installment Agreements, or being placed in "Currently Not Collectible" status.

We employ a practical approach to our client's unique concerns to ensure the most cost-effective and efficient approach to putting the taxing authorities in our clients' rear-view-mirror. As a leading authority on tax issues, we regularly educate members of the tax community (CPAs, accountants, and other lawyers) on a wide variety of topics.

If you have received correspondence from a taxing authority (IRS, Colorado Department of Revenue, etc.), [contact](#) our experienced tax controversy lawyers at Ireland Stapleton to discuss how we can assist in putting your mind at ease.

Practice Leader



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