



CITRIN COOPERMAN®
Accountants and Advisors



IRS REPRESENTATION AND TAX CONTROVERSIES

Focused on Simplifying Complex Tax Issues

Citrin Cooperman's tax controversy advisors' main priority is to advocate on behalf of both private and publicly-held clients when faced with IRS audits, appeals, and other tax controversy matters. Receiving a notification letter from the Internal Revenue Service for an upcoming audit or dealing with persistent collections calls from the IRS can be nothing short of heart stopping. At Citrin Cooperman, we understand this – and we can help.

How Citrin Cooperman Can Help

When it comes to complicated disputes and examinations, satisfying unpaid tax liabilities, or securing expert witnesses, Citrin Cooperman's tailored approach has consistently produced favorable outcomes and closure for our clients, across a range of industries and around the globe. Our deep experience in navigating the many hurdles of tax controversies allows us to provide our clients with the

Related Practices

Offshore Voluntary Disclosure Initiative
International Tax Services
Commercial Tax Services

technical expertise required for resolution, as well as peace of mind.

Related Services

- Audits of individual, payroll, estate, corporate, and partnership returns
- Amended and delinquent individual, payroll, estate, corporate, and partnership returns
- Domestic and offshore voluntary disclosures
- Foreign bank account reports (FBAR)
- Current FinCEN Form 114a, electronic report of foreign bank account
- Foreign Account Tax Compliance Act (FATCA)
- Collection information statements; Forms 433A, 433B & 433F
- Offers in compromise (doubt as to collectability or liability)
- Installment agreements
- Abatement of penalties - reasonable cause statements
- Failure to file, pay, and deposit penalty negotiations
- Tax liens and levies
- Substitute for returns filed by IRS
- IRS appeals
- Civil fraud penalty protests
- Expert witness testimony
- Whistleblower claims