

Tax Controversy

Becker represents clients in sensitive dealings and controversies with Federal and New York State government agencies. James Mahon, who leads this practice group, has over 30 years of experience responding to challenges by taxing authorities. The firm has negotiated with government agencies to obtain favorable settlements, and, where necessary, has successfully litigated civil and criminal proceedings commenced by the IRS and state taxing authorities. We represent clients undergoing tax audits, collection proceedings and regulatory investigations. We have also brought delinquent taxpayers into compliance with the tax authorities and guided numerous clients through the offshore voluntary disclosure process.

We are skilled negotiators experienced in Offers in Compromise, Installment Payment Agreements, Collection Due Process Appeals, Innocent Spouse Claims, Responsible Person Assessments, Sales Tax and Nexus Matters, and New York State Residency audits and nonresident income allocation audits. If litigation does result, our experienced litigation team has represented clients in Federal and State civil and criminal litigation.