

Tax Controversy



www.ulmer.com

CONTACT INFO:

John C. Goheen

p 216.583.7006
jgoheen@ulmer.com

Frederick N. Widen

p 216.583.7340
fwiden@ulmer.com

Ulmer & Berne LLP's tax attorneys represent clients in all phases of tax controversy matters. Our early involvement in a tax controversy often results in a favorable resolution at the exam or appeals level, which saves our clients from the costs (and risks) of tax litigation. The excellent reputation of our tax attorneys with federal, state and local tax authorities inures to the benefit of our clients throughout the tax controversy process.

When a tax audit is at the exam phase, we either deal directly with the examining agent or provide "behind the scenes" assistance to our client's own tax personnel. We are very experienced in marshalling facts, developing legal theories and preparing write-ups on the key factual and tax issues. When a matter moves from the exam to the appeals stage, we take charge of drafting the detailed written protest and negotiating with the appeals officer. We also handle tax litigation in the United States Tax Court and the Ohio Board of Tax Appeals and other federal and state courts. Our recognized skills and abilities as litigators contribute importantly to the successes we obtain during the administrative phases of tax controversies.



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