



Deloitte Tax Controversy Services

Broad-based, scalable, tailored for each client

Deloitte Tax Controversy Services¹ provide assistance spanning the various stages of IRS, state, and local examinations, from dispute avoidance to issue resolution and post-exam improvements. Through decades of working with clients on a broad range of tax issues, we have fine-tuned our technology, analytical procedures, and planning methodologies to offer a broad-based, scalable solution that we can tailor to the specific circumstances of each client and each tax controversy.

Every tax controversy is unique; almost all are urgent and inconvenient. Precisely for these reasons, Deloitte Tax Controversy Services provides a team and a solution tailored specifically to each client's controversy, drawing from our network of highly experienced, knowledgeable specialists from diverse backgrounds—former senior IRS and state executives, chief counsel officials, federal and state litigators, auditors, private industry tax executives, and technology specialists. Given the depth and breadth of experienced individuals on our team, we can ramp up and move quickly with the skills, processes, and well-established business relationships to expediently bring about a satisfactory solution.

Our close working relationships, credibility, and familiarity with tax agency teams and decision makers across the country enables us to quickly assess a situation, establish a tailored solution, and work efficiently with the appropriate agencies. We also understand the importance of key internal communications and can help tax professionals keep executives informed throughout the process, from explaining the controversy to outlining the resolution and protections established to limit future controversies.

What to expect from Deloitte Tax Controversy Services

Our deep understanding of tax controversy, strong credibility and working relationships with tax agencies, and “in the trenches” knowledge of what it takes to avoid, manage, and learn from the various types of tax disputes translates to value to our clients in the following ways.



Pre-controversy audit readiness

The right experience to help you identify areas that could raise issues and prepare to respond quickly to information requests; the credibility and strong working relationships to communicate effectively with tax agency examiners.



Examinations

Valuable day-to-day consultation; effective representation at tax agency meetings; analysis of proposed adjustments informed by comparable case experience; guidance resolving issues based on understanding of specific tax agencies and examiners; and reliable verification of final tax, penalty, and interest amounts.



Litigation, appeals, and settlement

The relevant case experience to analyze the strengths and weaknesses of the government's position and a company's position. The deep knowledge of administrative and appeals procedures—as well as the information and document management tools—to move the process forward as quickly and smoothly as possible. The technical tax, risk analysis, and finance skills to address IRS and state requests promptly and effectively. The negotiation skills and experience to facilitate favorable outcomes.



Proactive resolution services

Valuable, informed guidance on dispute resolution options and the broad range of decisions and issues that may arise—refund claims, statute of limitations issues, closing agreements, technical advice requests, federal 9100 relief filings, letter rulings, alternative apportionment, and voluntary disclosure initiatives.



Transfer pricing

Help establishing defensible transfer pricing practices, policies, and documentation. Deeply informed strategic and tactical assistance for defending transfer pricing before state and federal tax authorities.

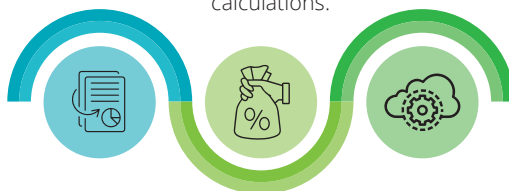
Deloitte Tax Controversy software tools and support

Interest Analyzer

Service to verify the accuracy of complex federal and state tax agency interest calculations.

Tax Controversy Manager

Proprietary web-based tool for managing exam-related data and reporting.



Data management

Assistance integrating systems to capture, retain, process, and analyze critical information, and respond quickly to high-volume information requests. Assistance avoiding common problems with tax data retention related to ERP systems implementation.

The Deloitte Tax Controversy Services team

The Deloitte Tax Controversy Services team advises clients through an extensive network of highly knowledgeable and experienced specialists who bring key skills and working relationships from diverse backgrounds—as lawyers formerly with large law firms, IRS Chief Counsel, state counsel, in-house attorneys, tax authority officials, alternative dispute resolution specialists, and tax litigation specialists for multinational businesses. For each tax controversy, we can assemble a team of Deloitte Tax specialists with the combination of experience and skills best suited to your specific case and specific goals. We welcome the opportunity to talk with you more about how we can help you resolve, defend, and actively manage global, federal, and multistate tax controversies.

Federal



Dan Dumezich
Managing Director
+1 312 486 5167
ddumezich@deloitte.com



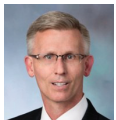
Howard Berman
Managing Director
+1 212 436 2242
hberman@deloitte.com



Dan Cook
Managing Director
+1 312 486 5478
dancook@deloitte.com



Ed Grady
Senior Advisor
+1 212 436 3936
edgrade@deloitte.com



John Keenan
Managing Director
+1 202 879 5605
jkeenan@deloitte.com



Rosemary Sereti
Managing Director
+1 202 220 2118
rsereti@deloitte.com

Transfer Pricing



Kerwin Chung
Principal
+1 202 879 3108
kechung@deloitte.com



Darrin Litsky
Managing Director
+1 212 436 5760
dlitsky@deloitte.com

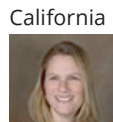


Joseph Tobin
Principal
+1 202 220 2081
jtobin@deloitte.com



David Varley
Principal
+1 202 220 2633
dvarley@deloitte.com

Multistate



California
Valerie Dickerson
Managing Partner
+1 202 220 2693
vdickerson@deloitte.com



California
Chris Campbell
Principal
+1 213 553 3072
cwcampbell@deloitte.com



California
Brian Toman
Special Advisor
+1 415 783 6137
btoman@deloitte.com



California
Scott Ewing
Managing Director
+1 916 288 3350
ewing@deloitte.com



California
Shirley Wei
Senior Manager
+1 213 553 1715
shiwei@deloitte.com



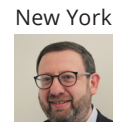
California
Fred Thomas
Senior Manager
+1 213 593 3741
frthomas@deloitte.com



New Jersey
Mike Bryan
Managing Director
+1 215 977 7564
mibryan@deloitte.com



New York
Don Rovetto
Partner
+1 212 492 2276
droveto@deloitte.com



New York
Abe Teicher
Partner
+1 212 436 3370
ateicher@deloitte.com



New York
Jack Trachtenberg
Principal
+1 212 436 4324
jtrachtenberg@deloitte.com



New York
Kirsten Gulotta
Managing Director
+1 212 436 3202
kgulotta@deloitte.com



Oregon, Washington
Scott Schiefelbein
Managing Director
+1 503 727 5382
sschiefelbein@deloitte.com



Pennsylvania
Steve Thompson
Managing Director
+1 215 246 2463
stethompson@deloitte.com



Texas, Louisiana
Robert Topp
Managing Director
+1 713 982 3185
rtopp@deloitte.com



Washington, D.C.
Scott Frishman
Principal
+1 703 251 3471
sfrishman@deloitte.com



Virginia
David Vistica
Managing Director
+1 202 370 2268
dvistica@deloitte.com

State RAR Reporting



Steve Spalletto
Managing Director
+1 317 656 2430
sspalletto@deloitte.com

To learn more about how Deloitte's Tax Controversy Services professionals can assist you, contact us at tcs@deloitte.com or visit us at www.deloitte.com/us/tcs.

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