

Internal Revenue Service Audits, Closing Agreements and Litigation

Internal Revenue Service (IRS) audits of qualified plans, employment taxes, fringe benefits and executive compensation are all on the upswing. In the financial downturn, many benefits have come under increased scrutiny – posing new challenges for tax and Human Resource managers.

Groom attorneys have over 35 years experience producing successful outcomes from IRS challenges. Our skills and techniques include:

- Thorough case preparation.
- Solid factual documentation.
- Creative legal strategies.
- Careful research to identify authorities.

Using these tools – as well as our longstanding work with key IRS staff – we have produced very favorable outcomes for clients such as:

- Settled a complex deferred compensation employment tax audit for 5% of the amount demanded by IRS.
- Negotiated a closing agreement that preserved a governmental retirement plan's qualification for a modest sanction.
- Resolved sophisticated Individual Retirement Account (IRA) compliance issues to conserve maximum IRA assets for the owner's benefit.