

## TAX CONTROVERSY AND LITIGATION

Tax litigation requires both substantive expertise in tax law and also advocacy skills. Sheppard Mullin Tax attorneys assist our clients in prosecuting and resolving tax disputes from audit through administrative appeals and litigation, including government-sponsored settlement and alternative dispute resolution mechanisms. When a problem cannot be resolved through alternative dispute resolution forums, we have tried tax disputes in state and federal judicial and administrative bodies, including the U.S. Tax Court, the California State Board of Equalization, and California trial and appellate courts.