

**Deloitte.**

# Tax Controversy Services

Many taxpayers are experiencing greater levels of tax controversy – this trend is likely to increase as we see taxing authorities:

- Increase hiring and focus on greater enforcement
- Closely monitor and address evolving provisions and procedural changes
- Increase focus on tax filings submitted by large and fast-growing businesses

How do you develop a proactive tax controversy approach to prevent, manage, and resolve disputes that are in line with your organization's overall risk strategy?



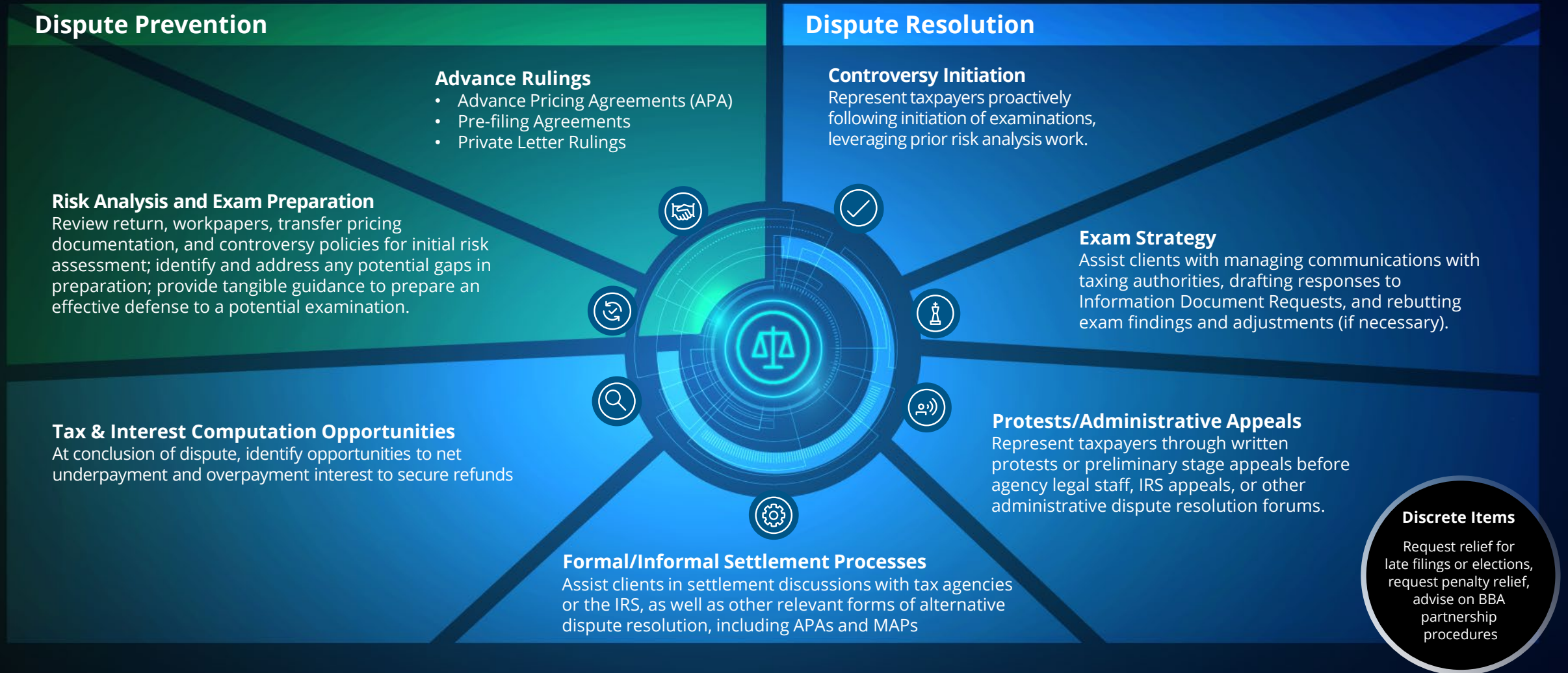
## Start to consider...

- ✓ Do you have the appropriate level of documentation and examination preparedness to match your organization's risk profile?
- ✓ Would your recent or planned transactions benefit from an advance ruling?
- ✓ Do you have your strategy and resources in place to proactively respond to IRS, state, and local tax agency inquiries?
- ✓ Do you have a coordinated approach to examinations and disputes?
- ✓ Are there opportunities to net underpayment and overpayment interest to secure cash refunds?

**Our Tax Controversy offering provides assistance spanning the various stages of IRS, US and non-US examinations, including:**



# Deloitte's scalable approach to supporting you through each phase of a tax controversy lifecycle:



Let's discuss how we can help you develop a proactive approach to prevent, manage, and resolve disputes

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