

## What Is Tax Controversy?

### Tax Controversy

A **tax controversy** is a dispute between a taxpayer and a tax authority such as the United States Internal Revenue Service (IRS) concerning whether the taxpayer has properly reported and paid their tax liability, and otherwise complied with applicable tax law. A tax controversy may concern a disagreement regarding the correct amount of tax or the manner in which the IRS is attempting to collect tax, as well as whether penalties are appropriate. Tax controversies may be resolved administratively or in litigation.

Having experienced legal representation is crucial for any taxpayer involved in a tax controversy matter. Winston is well-positioned to advise and represent clients in every aspect of federal and state tax investigations, administrative appeals, and litigation, including criminal tax matters.

Visit our [Tax Controversy & Criminal Tax](#) page for more information. Stay updated on the latest tax news and regulations on our [Tax Impacts](#) blog.

### Related Capabilities

Tax

Tax Controversy & Criminal Tax