

Tax – Federal

Caroline Lafourcade is deeply experienced advising clients in federal civil tax controversies and dealing with the IRS. As a result, she resolves tax controversy issues quickly, efficiently and successfully.

Civil Tax Controversy & Tax Resolution

Caroline represents businesses and individuals before the Examination Division, Collection Division and Appeals Office of the Internal Revenue Service in tax controversies. She has successfully resolved federal tax problems for individuals and businesses involving income, estate and gift, payroll, employment and excise taxes in all phases of the tax controversy process, from the beginning of the civil tax audit, to the preparation of tax protests and negotiation with IRS Appeals, to litigation in the United States Tax Court and in the Federal District Courts. She has a comprehensive understanding of the nuances of tax procedure and the tax controversy process.

She has substantial experience in international and domestic tax issues, worker classification, defense of trust fund liability assertions, employment tax defense, obtaining releases of IRS bank levies and federal tax liens, obtaining innocent spouse relief, penalty abatements, negotiation of installment agreements under the IRS Fresh Start Program and Offers-in-Compromise (OIC) with the IRS. Caroline represents clients who want to limit their civil liability for past failures to file accurate returns or who failed to file tax returns.

Caroline assists taxpayers who failed to report offshore income in the negotiation of voluntary disclosures with the IRS, allowing clients to avoid criminal prosecution and limiting civil penalties. She also assists employers in qualifying for the IRS Voluntary Classification Settlement Program (VCSP) to reclassify workers as employees prospectively, to eliminate the risk of a payroll tax audit and avoid costly penalties.

She assists taxpayers with:

- IRS Audit Defense
- Requests for Penalty Abatement
- Wage Levies
- Bank Levies

- Discharges of Property from the Federal Tax Lien
- Employment Tax Defense
- Offers-in-Compromise
- Installment Agreements
- Innocent Spouse Relief
- Worker Misclassification
- Passport Revocation for Seriously Delinquent Tax Debt