

Tax Fraud and Controversy

Sills Cummis & Gross has established itself as a leader in the areas of criminal and civil tax controversy.

Our criminal tax group has long been known as attorneys of choice in New Jersey and in the region for clients facing a federal or state criminal tax investigation. Regularly, defense attorneys at other firms representing clients in cases with tax implications have sought out our criminal tax group to bolster their representations with our in-depth tax experience and insight into the Internal Revenue Code and the manner in which the Internal Revenue Service (IRS) handles criminal investigations.

The Sills Cummis Tax Fraud team is comprised of a former IRS Special Trial Attorney with decades of experience in tax defense and civil tax controversy, and several former federal prosecutors.

Should the need arise, we collaborate with forensic accountants and retired IRS Special Agents to augment investigative resources and further develop client specific case strategy.

The Sills Cummis Tax Fraud and Controversy team of attorneys has advised hundreds of individuals and public and private corporations facing tax compliance issues, as well as tax professionals and preparers who find themselves the subject of a criminal tax investigation.

We have successfully represented numerous targets, subjects and witnesses in large scale tax investigations conducted by the United States (U.S.) Department of Justice (together with one or more U.S. Attorney's Offices) regarding allegations of undisclosed offshore bank accounts or abusive tax transactions. The team has also defended clients against more traditional allegations of tax noncompliance, such as failure to correctly report income or claiming false deductions or credits.

The team works diligently to help clients avoid criminal tax inquiries at the outset. We have successfully assisted clients in the early stages of an IRS inquiry (known as "eggshell audits") to prevent a criminal referral from being made and to keep the focus of the IRS investigation on, at most, civil tax matters only.

We have represented clients in multiple civil tax and tax-related matters, including Foreign Bank Account Report and other civil penalty matters, both administratively before the IRS Independent Office of Appeals, and in litigation before the U.S. Tax Court, U.S. District Court, or Court of Federal Claims. Similarly, our group has represented well over 1,000 clients in avoiding potential criminal prosecutions involving undisclosed foreign bank accounts and investments through the IRS Voluntary Disclosure Program and other less known administrative compliance pathways as well as applicable state voluntary disclosure programs across the U.S.

Sills Cummis & Gross P.C.

Related Practices: [Corporate Investigations and Integrity](#) and [White Collar Criminal Defense](#).