

# ALLEGED NEW YORK STATE AND COLLATERAL FEDERAL PERSONAL INCOME TAX LIABILITIES RESOLVED SUCCESSFULLY

## Client Type: Individual

Hodgson Russ assisted an officer and shareholder of a corporation alleged to have received a constructive dividend from the corporation, resulting in alleged New York State and collateral federal personal income tax liabilities. Our attorneys successfully sought a courtesy conference with the New York State Department of Taxation and Finance, resulting in the cancellation of the assessment and a refund of the erroneously seized funds. Subsequently, we sought audit reconsideration with the Internal Revenue Service challenging the collateral assessment of federal income tax liability. This, too, resulted in the cancellation of the assessment and a refund of the erroneously withheld refunds.

## Practices & Industries

State & Local Tax

