



TAX CONTROVERSY SERVICES

Overview

A&M provides Tax Controversy Services by assisting clients in preparing for both formal and pre-formal audits conducted by tax authorities. This includes addressing investigations, revisions, and procedures related to federal and local taxes, such as transfer pricing. We guide clients through the dispute resolution mechanisms provided under Mexican law, facilitating mediation between taxpayers, tax authorities, and Prodecon – the Mexican taxpayer defense agency – to achieve settlements supported by evidence. Additionally, we assist clients in obtaining tax refunds that have been denied or withdrawn by the Mexican tax authorities and address cross-border disputes, including mutual agreement procedures (MAPs) under double tax treaties signed by Mexico. Our services also include efforts to reduce potential surcharges and penalties imposed by the Mexican tax authorities and assist in negotiating Advanced Pricing Agreements or Bilateral Advanced Pricing Agreements.

WHO WE HELP

*Public Companies
and Multinationals*

*Public and Privately Held
Mid-Market Corporations*

*Private Equity, Credit,
Venture Capital and
Infrastructure Funds*

*Family Offices and High
Net Worth individuals*

Law Firms

WHY OUR CLIENTS CHOOSE US



Expertise

We offer deep, specialized knowledge of the Mexican tax landscape and the continuous updates on tax matters and judicial precedents, bringing in expertise from a range of tax teams throughout the entire lifespan of the project to get the best results. Our team has assisted dozens of companies, helping them navigate through audits and settlements and, therefore, has vast experience on the matter.



Networking

A&M facilitates mediation through Prodecon, sponsors meetings, and collaborates with its leadership. A&M professionals have extensive experience working with Prodecon.



Holistic solution

We offer a comprehensive range of services, including defense strategy analysis, filing necessary actions, and ensuring timely case follow-ups. Our objective is to provide legal and tax defense solutions that meet the specific requirements of our clients and support them throughout the controversy process. Our multidisciplinary teams, comprising tax advisory and tax litigation professionals, are engaged from the beginning through to settlement or litigation, ensuring all stages of the controversy process are managed strategically.

THE A&M TAX APPROACH



Preparation

Comprehensive data gathering and analytics enable the assessment of risks related to tax controversies and potential reputational impacts, which can aid in preparing a defense file for uncertain transactions or tax positions.



Timing

We will support the client from the start of the audit process, designing both overall and detailed defense strategies.



Assessment and strategy

Evaluating the case's scope and complexity helps develop an initial strategy based on legal precedents.



Communication

We help with the documentation and responses that will need to be prepared and submitted to the tax authorities.



Negotiation and resolution

Collaborating with tax authorities to address issues can present further arguments, clarify misunderstandings and enable all parties to more efficiently arrive at a resolution.



Post-resolution follow-up

Companies will need to ensure ongoing compliance with the resolution terms and address any follow-up issues that may arise.

THE A&M DIFFERENCE

MITIGATE EXPOSURES

A defense file helps taxpayers prepare for inspections and improves success rates. Complete responses to audits lead to better outcomes. If an assessment is likely, we assist clients in seeking settlement options with authorities or Prodecon.

SAVE MONEY

Reduced exposure can lead to decreased penalties and surcharges, which results in fewer financial burdens for companies.

PROVIDE CERTAINTY

Working with the Mexican tax authority to assess credits can result in certainty of the tax treatment for the coming years.

ADOPT BEST RISK MANAGEMENT PRACTICES

Implementing risk management practices aims to reduce the different kinds of risk associated with a business, such as reputational risk. It is important for taxpayers to comply with audits and mediations to preserve their reputation.

CONTACT US



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ABOUT ALVAREZ & MARSAL

Founded in 1983, Alvarez & Marsal is a leading global professional services firm. Renowned for its leadership, action and results, Alvarez & Marsal provides advisory, business performance improvement and turnaround management services, delivering practical solutions to address clients' unique challenges. With a world-wide network of experienced operators, world-class consultants, former regulators and industry authorities, Alvarez & Marsal helps corporates, boards, private equity firms, law firms and government agencies drive transformation, mitigate risk and unlock value at every stage of growth.

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