

Area of Law

Tax Litigation and Administrative Proceedings

Tax disputes in judicial and administrative proceedings that depend on accounting examination and tax calculations.

The tax debate is legal. The proof of the amount owed is accounting.

In tax assessments, tax foreclosures and tax actions, tax bases, credits taken and revenue classifications must be demonstrated. The documentation is extensive and spread across books, systems and tax filings; SGEx organizes these sources so that the discussion rests on verified amounts.

When clients call on SGEx

Challenge or appeal in an administrative tax proceeding.

Tax foreclosure or motions to stay with disputed amounts.

Tax refund and offset claims.

Loss of tax immunities and incentives.

Accounting expert evidence in tax litigation.

How SGEx works

Tax base rebuilt

The disputed tax base is rebuilt from the company's records.

Compared with the assessment

The tax authority's or the other side's calculation compared item by item.

Differences by nature

Discrepancies recorded by nature and by period.

SGEx does not provide legal advice: it technically demonstrates the amounts on which the tax discussion rests.

What We Solve

Questions in a tax dispute.

Is the tax authority's calculation correct?

Review of tax calculations and tax assessments.

Is the amount being enforced owed?

Enforcement and challenge of tax credits.

How much can be recovered?

Determining amounts in tax refund and offset claims.

What is the effect of losing the incentive?

Loss of tax immunities and incentives.

Do the books match the tax filings?

Reconciliation between the accounts and tax filings.

How large is the contingency?

Determination of tax contingencies.

How We Approach It

Steps applied to this type of engagement.

1**Assessment**

Reading the assessment, foreclosure or claim.

2**Records**

Gathering books, systems and tax filings.

3**Recalculation**

Rebuilding the disputed tax base.

4**Differences**

Discrepancies by nature and period.

What we examine: tax assessments and certificates of tax debt, accounting and tax books, tax filings, invoices, tax calculations and the tax authority's schedules.

Deliverables: technical accounting and tax opinion, recalculation of tax credits, expert report, technical questions and tax contingency report.

Related Topics

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and Non-Profits
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Industrial, Manufacturing
and Consumer Goods

SGEx at a Glance

Figures reported by SGEx, updated periodically.

400+

engagements completed

100+

court cases in progress

300+

clients served

200+

law firms served

500+

reports, expert reports and opinions delivered

BRL 100M+

in fraud and irregularities identified

Why Talk to SGEx

Expert Services, Disputes and Forensics.

Technical independence

SGEx does not provide legal advice or represent interests: it examines, calculates and demonstrates.

Multidisciplinary team

Accounting, economics, law, business administration, finance and engineering on the same engagement.

Forensic experience

Professionals with prior roles at FTI Consulting, PwC, BDO, Deloitte, KPMG and Mazars.

Traceable methodology

Explicit assumptions, calculation workpapers and conclusions that third parties can replicate.

Who Leads the Work

Tax expert services in judicial and administrative proceedings.



Sidney Gomes
Founder and Managing Partner
of SGEx Group

Works on tax expert services in judicial and administrative proceedings. Accountant, economist and attorney, with prior roles at PwC, BDO, Deloitte and KPMG.



Marco Bole
Managing Partner, Advisory
and Finance

Works on tax expert services in judicial and administrative proceedings and on court-ordered revenue garnishment. Business administrator (CRA-SP).

Request an Assessment

Describe the assessment, foreclosure or tax claim, the period and the documents available. SGEx will assess the scope before submitting any proposal.

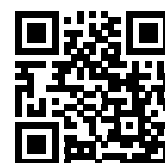
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