

## TAX PLANNING, ADVICE AND CONTROVERSY

Tax planning is a critical component in almost all business transactions. Whether structuring the purchase or sale of an existing business or the formation of a new business, our attorneys are sensitive to the tax savings opportunities for the business and its owners.

Relying on our extensive experience in corporate, partnership, real estate, and individual tax planning, we are involved in all aspects of structuring business transactions to help our clients achieve optimum tax outcomes.

We also represent clients in connection with controversies with taxing authorities and advocate for them through tax dispute resolution, from state and federal administrative hearings to the federal appellate level.

Our expertise includes tax implications of cross-border matters, international treaty networks, and the tax treatment of various jurisdictions outside the United States.

We offer the following tax planning services:

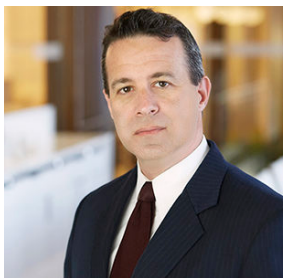
- Structuring business and real estate transactions to achieve optimal tax treatment
- Designing, negotiating, and structuring profit-sharing and tax allocation arrangements among owners of corporations, limited liability companies, and partnerships
- Structuring settlements of business and marital disputes to minimize tax consequences
- Succession planning and wealth transfers among family members in connection with family-owned businesses
- Planning and advice to maximize opportunities regarding income, gain and deductions for business entities, trusts, and individuals
- Structuring transactions to maximize gift and estate planning opportunities for business owners
- Assisting non-U.S. clients in making tax efficient investments in U.S. corporations, limited liability companies, and partnerships.

Tax controversy services include representing clients in connection with audits by or disputes with federal, state, and local tax agencies, including:

- Internal Revenue Service (IRS) Audits, Appeals, Trust Fund Liability, audits and appeals, Tax Court and US District Court Litigation, Foreign Account Representation, Criminal Investigations, Collection Representation, Offers, Collection Due Process hearings and litigation, and representation before Commission on Practice for Circular 230 violations
- Franchise Tax Board (FTB) Audits, Residency Audits, Protests, Administrative Review, Settlement, and Refund Litigation
- State Board of Equalization (SBE) Audits, Criminal Investigations, Protest, Administrative Hearing, and Litigation
- Property tax appeals and disputes with county assessors and the State Board of Equalization

## Professionals

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