



**GRAY REED**<sup>®</sup>  
ATTORNEYS & COUNSELORS

# TAX & TAX LITIGATION

Our tax section provides experienced legal counsel to clients on all matters arising from international, federal and state tax laws. Our areas of expertise include:

- Ad valorem
- Asset protection
- Civil and criminal tax litigation
- Consulting
- Controversy
- Corporate
- ERISA
- Estate planning
- Foreign account disclosures
- Franchise
- Income tax
- State tax
- International
- Mergers & acquisitions
- Partnership
- Planning
- Property
- Real estate
- Reorganizations
- White-collar defense

Our clients include public and private companies, partnerships, nonprofit organizations, estates and trusts, employee benefit plans, and individual taxpayers.



Our tax section is proud of its ranking among the very best firms in the 2020 U.S. News & World Report and Best Lawyers' "Best Law Firms" rankings. In addition, many of our attorneys are individually recognized.

Our goal is to lead clients efficiently and professionally through the ever-changing maze of tax issues and ensure that existing or contemplated financial affairs of clients are structured in a practical and cost-effective manner that achieves business or personal objectives with minimal exposure to tax.

## TAX PLANNING

We work closely with clients and their accountants to reduce taxes associated with business activities and significant transactions, and in the areas of tax review, compliance, reporting and controversy. We keep abreast of the ever-changing and complex tax environment so that we can alert our clients to new planning opportunities and compliance requirements, and to provide legal advice that is timely to our clients' business affairs. Serving individuals as well as small, emerging and middle market businesses and large, multinational corporations, we have the experience to design creative and practical solutions to mitigate taxes in complex business transactions.



## TAX CONTROVERSY

When it comes to tax controversy, we provide clients with experienced representation in tax examinations/audits, protests to the IRS Office of Appeals, and in equivalent state and local appeals functions. We are also skilled and experienced in litigation before the U.S. Tax Court, the U.S. Court of Federal Claims, U.S. District Courts, as well as state and local tax authorities and courts.

## INTERNATIONAL TRANSACTIONS

As business becomes increasingly international, business planners must consider the tax implications of international and cross-border transactions. We help clients minimize the worldwide taxation of their investments and advise on investment restructuring and disposition. This often requires familiarity with the tax laws of several countries and bilateral and multilateral tax treaties, as well as U.S. tax laws.

## WHY CLIENTS FEEL AT HOME AT GRAY REED

Your experience with our tax attorneys will be fully aligned with your goals and objectives and tailored specifically to how you want to do business with us. Our lawyers are adaptable and nimble – you will never be forced into a box that doesn't fit your opportunity or problem, or your needs and desires. Whether we are your longtime advisor on tax-related issues or guiding you through a government investigation, you'll be comfortable with our skill and practical approach. We know exactly when to turn up the heat and when collaboration is the smartest way for you to achieve your goals.

## EXPERTISE IN THE FIELD

Many of us have a background in general corporate and tax matters and also concentrate in particular areas of tax law, including corporate, real estate transactions, partnerships and limited liability companies, state and local, exempt organizations, banking, international and individual taxation and estate planning.

We regularly publish articles and speak on topics covering federal, state, and international tax issues. Many of us hold advanced degrees in tax or accounting. Three attorneys are Board Certified in Tax Law by the Texas Board of Legal Specialization and four are Certified Public Accountants. Many of us have worked for the government as attorneys for the U.S. Department of Justice, the Internal Revenue Service in Washington, D.C., or the Texas Comptroller of Public Accounts. Several of us teach undergraduate and post-graduate tax courses as adjunct faculty at SMU and the University of Houston. In addition, one of us has served as president of the Texas Society of CPAs and has served on the AICPA's national tax executive committee.