



GRAY REED®



# 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
- Cryptocurrency
- Estate planning
- Foreign account disclosures
- Franchise
- Income tax
- State and local tax (SALT)
- International
- Mergers & acquisitions
- Partnership
- Planning
- Federal tax credits related to renewable energy and research and development expenses
- 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.

## TAX PLANNING & STRUCTURING

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.

## CRYPTOCURRENCY

Gray Reed attorneys have the knowledge and experience to provide guidance to clients on virtual currency, digital assets and other benefits related to blockchain technology. We handle tax issues involving business structures that hold digital assets or engage in cryptocurrency mining, voluntary disclosure procedures for unreported cryptocurrency, and advice and litigation of tax controversies regarding the IRS interpretations or adjustments related to cryptocurrency transactions.



## STATE AND LOCAL TAX (SALT)

The State of Texas prides itself on its business-friendly regulations and its aversion to income taxes while downplaying the many forms of tax that it does impose, which include ad valorem taxes, sales and use tax, franchise tax, etc. Just as in the case of federal tax planning and controversy work, we provide cost-effective solutions to our clients' tax issues, which are designed to address the matter at hand and reduce the likelihood of reoccurrence.

## 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.

## 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.

Our group also publishes the Texas Tax Talk blog, which is a resource for CPAs and non-tax lawyers seeking developments, commentary and analysis relating to state and federal tax issues.

In addition to the blog, 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, are Board Certified in Tax Law by the Texas Board of Legal Specialization and/or are Certified Public Accountants. Many of us have worked for the government or at Big Four accounting firms. Several of us teach undergraduate and post-graduate tax courses as adjunct faculty at various universities in Texas.

## ACCESS TO RESOURCES AND GENERAL COUNSEL CAPABILITIES

As a full service firm, we are uniquely positioned to effectively represent and counsel clients beyond routine or the most complex tax matters. When a client's need goes beyond the expertise or jurisdiction of a tax attorney, our firm has a worldwide network of lawyers for international and cross-border issues along with other Gray Reed attorneys who focus on areas such as estate planning, banking & finance, energy, construction, healthcare, labor & employment, mergers & acquisitions, private equity, real estate, government investigations & compliance, appellate and commercial litigation. These resources allow us to serve as outside general counsel for our clients and help solve nearly any issue they may face in the life cycle of their business.

## 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.