

Tax Controversy

Williams & Connolly represents both U.S. and foreign clients in domestic and international tax matters. Our clients include both entities and individuals, and our experience includes both civil and criminal tax controversy matters.

The firm's tax partners have previously worked at the Internal Revenue Service or the U.S. Department of Justice, and are recognized as leading practitioners in both tax planning and tax controversy matters.

The firm has an active tax controversy practice, both civil and criminal. We represent entities and individuals in tax examinations and appeals before the Internal Revenue Service and in tax litigation in the federal courts. The firm also represents clients in all phases of criminal tax matters, from criminal investigations to high-profile criminal tax litigation.

On the tax planning side, we guide our clients through the many facets of the tax laws, including advice on compensation issues, structuring tax advantaged corporate reorganizations, acquisitions, restructurings, debt financings, sales, exchanges, obtaining private letter rulings and other transactions involving "C" and "S" corporations, partnerships, joint ventures and LLCs. We also work with other litigators in the firm on tax issues that arise in civil and criminal litigation.

The firm also is experienced in representing tax-exempt organizations such as section 501(c)(3) organizations and in providing advice regarding charitable giving, private foundations, public charities, joint ventures and other financial relationships between non-profit and for-profit organizations.