

Tax Controversy & Litigation

At Clark Hill, we skillfully and forcefully advocate taxpayer rights. Our team has successfully litigated some of the more famous multi-million dollar cases at issue before the US Tax Court, as well as on appeal before the US Courts of Appeal and the US Supreme Court. Our team has ably represented a selection of the largest corporations and organizations in the country, as well as small and middle-market businesses, individuals, and trusts and estates involved in various tax controversies.

The right combination of veteran experience and honed advocacy is why our firm is valued. We resolve tax disputes that range from administrative examinations and appeals to litigation and have accomplished client objectives through skillful negotiation with Internal Revenue Service (IRS) Revenue Agents to conserve time and resources.

We work in tandem with client auditors and accountants to favorably resolve disputes ranging from income tax, international tax, employment tax, estate valuation, and partnership allocations, to defending the tax-exempt status of charitable or religious organizations. We also frequently advise on sensitive tax matters, including fraud penalties, voluntary disclosures, and criminal tax investigations.

Our team knows how to advocate client rights before the Examination Division, Collection Division, and Appeals Office of the IRS and State Board of Equalization, among others. Very often, a satisfactory resolution is reached. However, when a problem cannot be resolved through tactical negotiation or alternative dispute resolution, we try tax claims in federal and state courts throughout the country and before the US Tax Court and US Court of Federal Claims.

At the state level, our team represents clients in audits, administrative appeals, and tax litigation. We are dedicated to delivering the requisite and practical know-how needed to deal with state taxing authorities.

As many of our clients own commercial tracts of land used for business purposes such as real estate development, agriculture, and manufacturing, the resolution of property tax disputes is among our core strengths. We litigate property tax appeals before the applicable state Tax Tribunal involving large industrial complexes, shopping centers, office buildings, large and small apartment complexes, hospitality properties, hunting and fishing clubs, and racing tracks. We are well-versed in the administrative process and litigation, particularly arising after an unsuccessful hearing with the administrative review board or after the local appraisal district decides to litigate the review board's decision.

Our team maintains a track record of favorable results in:

- Civil and criminal IRS and state tax examinations.
- IRS administrative appeals.
- Federal and state civil tax litigation.
- Federal criminal tax litigation, including the defense of white-collar crimes.
- Property tax disputes and litigation.
- Representing attorneys and accountants in malpractice cases and disciplinary proceedings.
- Representing high-net-worth individuals with unreported offshore accounts and assets.
- Defending clients with tax debts facing levies, liens, garnishments, and other IRS enforcement activities.
- Advising individuals, businesses, and other professionals concerning tax issues in divorce, litigation, and settlement.



Tax & Estate Planning Leaders

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Tax & Estate Planning Areas of Practice

Elder Law
Estate Planning & Probate
General Tax Planning
Guardianship & Conservatorship Administration
International Tax
State & Local Tax
Tax Exempt and Charitable Organizations
Trust and Estate Controversy
Wealth Transfer & Business Succession Planning