

Joshua Wu

Member

Josh Wu advises large corporations, mid-size businesses, startup companies, and high-net-worth individuals on all aspects of federal tax law. He has particular experience with resolving complex IRS audits, administrative appeals, civil tax litigation, offshore trusts and assets, multijurisdictional investigations, and IRS collection matters.

Josh represents clients in an array of tax controversies and tax litigation matters before the Internal Revenue Service (IRS), the U.S. Tax Court, the U.S. Court of Federal Claims, and the U.S. Court of Appeals for the Federal Circuit.

He regularly helps clients respond to IRS information document requests, manage electronic discovery, prepare for interviews with the IRS, and navigate procedural issues.

Prior to joining Clark Hill Strasburger, Josh worked for several international law firms and has been quoted in major news outlets such as *The Street*, *Federal Tax Weekly*, and *Business News Daily*.

EXPERIENCE

- Obtaining favorable outcomes for partnerships and large corporations in matters regarding income tax, employment tax, summons enforcement and civil and criminal penalties.
- Representing high-net-worth individuals with unreported offshore assets. Clients have avoided tens of millions of dollars in penalties.
- Defending clients from IRS and state criminal tax investigations.
- Helping clients resolve tax debts and penalties to avoid liens, levies, garnishments, and other enforced collection activities.
- Advising multinational businesses with respect to transfer pricing audits and planning.
- Working with the IRS Office of Professional Responsibility to resolve disciplinary inquiries for tax professionals.
- Working with professional services firms and non-profit organizations to evaluate internal tax and bank secrecy compliance procedures and proactively address areas of concern.
- Guiding several energy companies through the IRS audit process and resolving state tax matters.
- Advising a philanthropic organization, with its goal to support start-ups that provide micro-financing to underserved populations, by streamlining its tax reporting and working to reduce its compliance burden.

PRESENTATIONS

- *General Federal Enforcement Update*, Indiana CPA Society, Indiana Tax Conference (November 2018)
- *Partnership Tax Update and Choice of Entity*, North Carolina Association of Certified Public Accountants, 79th Annual Symposium (November 2018)
- *Crowdfunding Campaigns: Tax & Legal Issues*, San Antonio CPA Society's CPE Symposium (October 2018)
- *Corporate and Partnership Taxation*, South Carolina Society of Accountants (October 2018)
- *Dealing with the New IRS Partnership Audit Rules*, National Association of Accountants (July 2018)
- Co-presenter. *Partnership/LLC Equity Compensation - Planning & Possibilities*, Texas BarCLE (May 2018)
- *Centralized Partnership Audit Regime*, Strasburger's Tax Symposium (November 2017)
- *Representing Clients in Collection Matters*, Maryland Society of Accounting and Tax Professionals (November 2017)
- *Tax Penalties and How to Fight Them*, Oregon Association of Independent Accountants (October 2017)
- *Ethics in Tax Practice, Estate and Gift Tax Disputes, and Business Planning for Accountants*, South Carolina Society of Accountants (October 2017)
- *So I Missed an Election...Now What?*, Georgia Association of Accountants and Tax Professionals (June 2017)
- *Tax Treatment of Gambling Winnings and Losses, Taxation of Crowdfunding, and Cybersecurity for Tax Professionals*, Maryland Society of Accounting and Tax Professionals (June 2017)
- *The IRS is Coming: How to Prepare for the New IRS Partnership Audit Rules*, New Jersey Society of CPAs (June 2017)
- *Understanding the Forms and Processes for Disclosing Foreign Accounts*, Virginia Society of Enrolled Agents (June 2017)
- *Death and Taxes: Estate Planning Fundamentals*, National Society of Accountants (June 2017)



Offices

San Antonio

2301 Broadway Street
San Antonio, TX 78215

Washington D.C.

1001 Pennsylvania Ave NW
Suite 1300 South
Washington, DC 20004

210.250.6078 (phone)

210.258.2703 (fax)

josh.wu@clarkhillstrasburger.com

Education

LL.M., Georgetown University Law Center, Washington DC, 2008, Taxation; Note Advisor, The Tax Lawyer

J.D., Syracuse University College of Law, Syracuse, New York, 2007, Tax Law Society, Member

B.A., University of Virginia-Main Campus, Charlottesville, Virginia, 2004, Foreign Affairs

State Bar Licenses

New York

District of Columbia

Texas

Court Admissions

U.S. Tax Court

U.S. Court of Federal Claims

U.S. Court of Appeals, Federal Circuit

- *IRS Audit Representation and Tax Research and Authority*, Tennessee Society of Enrolled Agents (June 2017)
- *Representing Clients in Collections Matters*, Maryland/DC Society of Enrolled Agents (May 2017)
- *Fundamentals of Tax Litigation*, Annual Young Tax Lawyers Symposium (April 2017)
- Panelist. *Game Change: The New Partnership Audit Regime*, American Bar Association (March 2017)
- Panelist. *Partnerships and Passthroughs*, Federal Bar Association Tax Law Conference (March 2017)
- *Tax Penalties and How to Fight Them, Offers in Compromise, and Nuts and Bolts of an IRS Audit*, Georgia Association of Accounting and Tax Professionals (November 2016)
- *Worker Classification and the Tax Court*, ABA Section of Taxation Meeting (September 2016)
- *Understanding Stages and Strategies in a Criminal Tax Case*, Bloomberg BNA (July 2016)
- *Ethical Considerations in Drafting Tax Opinions*, ABA Forum on Affordable Housing (May 2016)
- *Evolution of a Criminal Tax Case*, Federal Bar Association (April 2016)
- *TEFRA Partnership Audit Procedures Primer*, NYU Institute on Federal Taxation (October 2015)

PUBLICATIONS

- *The Good and Bad News of the Cryptocurrency Boom*, American Bar Association (Winter 2018)
- *How the IRS is Adapting to Cryptocurrency and the Sharing Economy*, State Bar of Texas Tax Section (Spring 2018)
- *Disclose Foreign Assets Now: IRS To Discontinue OVDIP*, Strasburger's Tax Strategies (March 2018)
- *Warning for Taxpayers Prepaying Real Property Taxes in 2017*, Strasburger's Tax Strategies (December 2017)
- *Tax Consequences From Damages and Theft in the Sharing Economy*, Tax Notes (May 2017)
- *The IRS is Coming: How to Prepare for the New IRS Partnership Audit Rules*, National Society of Accountants - Main Street Practitioner Magazine (November 2016)
- Co-author. *Quietly Finding a Home in the Voluntary Disclosure World*, Tax Notes (July 2015)

MEDIA

- [Wolters Kluwer Interview: A Three-Part Series on the New Code Sec. 199A Passthrough Deduction and Proposed Regulations](#), Wolters Kluwer (September 2018)
- [Greaves Becomes Sixth Tax Court Judge Nominee](#), Tax Notes (August 2018)
- [Newsflash: Strzok Might Have to Pay Taxes on His GoFundMe Lucre](#), Weekly Standard (August 2018)
- [Find the Right Law School for a Tax Law Career](#), U.S. News & World Report (February 2018)

Practices, Industries & Services

Estate Planning & Probate

Areas of Emphasis

Federal and State Tax Controversy
Tax

Memberships

- American Bar Association, Tax Section, Young Lawyers Division, Tax Law Committee, Vice Chair
- New York State Bar Association, Member
- District of Columbia Bar Association, Tax Section
- Asian Pacific American Bar Association, D.C., Member

Honors

- Named among Texas Rising Stars by Thomson Reuters (2018)
- Named among District of Columbia Super Lawyers Rising Stars by Thomson Reuters (2017)

Presentations

- "What to do When the IRS Comes Calling: Dealing with IRS Controversies" Webinar