



## Tax Controversy

Williams Mullen's Tax Controversy Team represents individuals, and regional, national and multi-national businesses on a broad range of tax dispute issues and litigation matters. Our clients benefit from the specific experience of attorneys who focus on tax controversy matters, as well as from the capabilities of seasoned litigation and tax attorneys.

The breadth of our tax controversy service capabilities include:

- Managing civil and criminal litigation on local, state and federal levels
- Contesting individual, business and estate tax audits at the agent and administrative appeals levels
- Defending complex tax-advantaged transactions
- Negotiating offers in compromise
- Contesting IRS/ERISA audits of employee benefit plans, welfare plans, and executive compensation arrangement
- Obtaining refunds and tax abatements of state and local business taxes

Our attorneys have successfully defended clients in all stages of federal and state tax audits and appeals -- from pre-audit planning, through handling the audit process for the client on an off-site basis, to negotiation of post-audit offers in compromise to appeals of litigated decisions. We have also obtained favorable rulings from the Tax Policy Division of the Department of Taxation and the Virginia Tax Commissioner. Many of our attorneys are CPAs or hold LLMs in Taxation.

Our skills in counseling clients with tax audits are only paralleled by our substantial tax litigation capabilities. We are sensitive to clients' concerns about the costs of litigation and have a strong track record of settling most cases administratively with the IRS Appeals Division. However when litigation is necessary, our Tax Controversy team brings both strategic litigation skills and technical tax experience to the table. In addition, our clients benefit from the unique insights of a former Assistant United States Attorney, Eastern District of Virginia, responsible for criminal tax cases, and a former Associate Independent Counsel who prosecuted high-profile criminal tax investigations. This experience makes our team especially adept at developing proactive, or defensive, strategies that best serve our clients' interests. As a result, we have successfully represented our clients in civil and criminal tax matters at all levels including the Federal District Court, Federal Court of Claims, federal appellate courts, state courts, and state and local administrative tribunals.

Team members are regularly called upon to share their experience through lectures for the Virginia State Bar, American Bar Association and the Department of Justice on civil and criminal tax matters and ethics. They are members and hold leadership positions at the American College of Tax Counsel, the American College of Trust and Estate Counsel, the Virginia Bar Association's Taxation Section, the American Association of Attorney CPAs, the Virginia Society of CPAs, and the Taxation Section of the American Bar Association.

## Experience

---

- Online Travel Companies

### Defended Federal Class Action for Occupancy Tax Liability

Defended online travel companies in a case a class action case filed on behalf of all North Carolina jurisdictions levying occupancy taxes. At issue was whether or not fees for online travel bookings were subject to occupancy taxes. Williams Mullen worked as North Carolina counsel with national lead counsel and four other law firms to defend the case.

---

- Computer Programming Specialist

### Defended Individual Against Federal Criminal Tax Claims

Case involved complicated tax issues and use and examination of tax accountant experts.

## Related News

- What the Courts Think of North Carolina's Forced Combination Rules and Related Penalties
- Federal Investigation into Offshore Accounts: ?John Doe? Summons Served on First Data
- Williams Mullen Announces Election of New Partners
- Eleven Williams Mullen Maupin Taylor Lawyers Named 2008 "North Carolina Super Lawyers"
- Ten Williams Mullen Attorneys Named "Legal Elite"
- 100 Williams Mullen Attorneys Named 2014 Best Lawyers in America
- IRS Gets ?Bageled? in Tax Court Over Family Office Expenses
- Stephanie Lipinski Galland and Dave Albo Named to Washingtonian's Top Lawyers 2018
- 119 Williams Mullen Attorneys Listed in 2020 Edition of The Best Lawyers in America©
- Craig Rascoe Named to 2020 Class of ?Leaders in the Law? by Virginia Lawyers Weekly
- Williams Mullen Grows Private Client & Fiduciary Services Practice with New Partner

## Related Attorneys

- Farhad Aghdami ? 804.420.6440 ? aghdami@williamsmullen.com
- Tammy Calabrese ? 703.760.5214 ? tcalabrese@williamsmullen.com
- Daniel J. Durst ? 804.420.6465 ? ddurst@williamsmullen.com
- Thomas R. Frantz ? 757.473.5306 ? tfrantz@williamsmullen.com
- James Philip Head ? 703.760.5231 ? jhead@williamsmullen.com
- Gilbert C. "Gib" Laite, III ? 919.981.4046 ? glaite@williamsmullen.com
- Stephanie Lipinski Galland ? 202.327.5094 ? slipinskigalland@williamsmullen.com
- Craig L. Rascoe ? 804.420.6472 ? crascoe@williamsmullen.com
- Kyle H. Wingfield ? 804.420.6445 ? kwingfield@williamsmullen.com