



Katten

Katten Muchin Rosenman LLP

TAX CONTROVERSY AND LITIGATION

Our Clients

We represent individual taxpayers, publicly traded and privately held corporations, trustees of defined contribution plans including leveraged and non-leveraged ESOPs and other ERISA plans, partnerships, limited liability companies, executors, tax-exempt entities, municipal bond issuers, borrowers, underwriters, advisors, and swap and investment providers.

Our Services

Our Tax Controversy and Litigation practice unites seasoned litigators with attorneys who focus on tax planning, tax-exempt bonds, estate and gift tax, and employee plans. We represent clients through all stages of sophisticated criminal and civil tax investigations and litigation, including sensitive audits, examinations and enforcement actions. Our attorneys negotiate favorable resolutions at all levels within the Internal Revenue Service (IRS) and the Department of Justice (DOJ), and successfully represent clients in litigation before both the federal district courts and the US Tax Court as well as in sentencing and appeals. We have strong working relationships with the IRS and the DOJ, and have earned the respect of those who will be sitting across the table or on the bench.

In the initial stages of an audit, our tax controversy attorneys quickly identify significant issues and develop strategies that will most effectively achieve our clients' objectives. We advise on responding to information requests and summonses, establish procedures to identify and protect privileged documents, prepare

witnesses the IRS seeks to interview, and establish appropriate document retention procedures to preserve evidence.

We work to minimize our clients' tax liabilities in a variety of ways, including contesting proposed tax liens and levies, negotiating collection issues with the IRS, litigating questions of corporate officers' personal liability for corporate obligations, and representing clients before the IRS and other governmental bodies in connection with alleged tax obligations.

By winning tax issues at trial, our litigation attorneys have saved clients from large proposed tax liabilities. We also have enjoyed great success in preventing charges from being filed against our clients involving allegations of fraud and other civil or criminal accusations, and in defending tax fraud indictments.

Our team also advises clients on tax-based contractual and indemnity claims arising from international transactions. We counsel taxpayers on tax investigations and disputed tax assessments by HM Revenue & Customs (HMRC) in the United Kingdom. We coordinate and synthesize advice on multijurisdictional tax disputes in Europe and Asia.

With extensive experience both in trying cases and resolving disputes outside the courtroom, Katten's Tax Controversy and Litigation team offers effective representation that not only increases the likelihood of an advantageous resolution without litigation, but also sets the stage for a far greater chance of success if a case must go to trial.