

# Federal Tax

Foster Garvey's Federal Tax lawyers help clients successfully navigate federal tax laws, advising them on myriad issues including minimizing tax burdens, compliance and transactional tax planning. Our team delivers a full range of tax-related services to clients, backed by decades of experience.

#### **Transactional Tax Planning**

We help our business clients plan for, identify and resolve tax issues arising in mergers, acquisitions, divestitures, recapitalizations, real estate and other transactions. Our Federal Tax team also assists new businesses to select a tax-appropriate legal structure.

### Tax Controversies: Audits, Appeals and Litigation

Foster Garvey Federal Tax attorneys have a strong track record and decades of experience to back up advising and defending clients in tax controversies. We represent clients in income tax, employment tax, and estate and gift tax examinations, appeals and litigation. Our attorneys also provide legal support to CPAs and tax return preparers during examinations and appeals.

# **Criminal Tax Litigation**

Our team represents taxpayers being investigated or prosecuted in criminal tax matters, which may include charges of tax evasion, failure to file returns and reports, or filing false returns and reports.

# **Bankruptcy and Taxes**

Bankruptcy proceedings have significant tax implications to creditors and debtors. We advise creditors, debtors and potential third-party investors on federal tax issues arising out of bankruptcy or debt restructuring. In addition, we help clients negotiate disputes with taxing authorities over the priority of tax liabilities.

# Estate and Gift Tax Planning and Succession Planning for Family-Owned Businesses

We offer clients an array of estate planning services from straightforward planning to structuring highly complex estate plans. Members of our team counsel clients on gift planning,

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Jim McNeill
Steven D. Nofziger



generation-skipping transfer tax planning, the use and creation of living trusts, family limited partnerships, durable powers of attorney and property transfer agreements. For more information, please see our Estate Planning & Probate practice. Our lawyers also assist family-owned businesses plan for the transfer of control from one generation to the next, employing such planning tools as irrevocable trusts funded with life insurance to finance estate tax obligations.

# **Employee Benefit Plans**

We design and qualify a variety of retirement plans, including traditional defined benefit plans, cash balance plans, profit-sharing plans, 401(k) plans and other employee benefit arrangements. Our attorneys also advise clients on the day-to-day administration of plans, and help them prepare reports and returns. Additionally, we represent clients in disputes involving the duties of fiduciaries and the rights of participants and beneficiaries. For more information, please see our Employee Benefits & Executive Compensation practice.

## **Tax-Exempt Organizations**

Foster Garvey's tax-exempt clients include health care providers, educational institutions and other nonprofit organizations. We help our clients obtain and maintain tax-exempt status. In addition, we offer advice on structuring joint ventures, characterizing income and obtaining tax-exempt financing. For more information, please see our Charitable & Tax-Exempt Organizations practice.

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