

TAX DISPUTE RESOLUTION

The principal goal of the Hodgson Russ attorneys working in the area of tax dispute resolution is to win your case. Our attorneys represent clients in tax disputes from the audit level through the appellate process and in the court system.

We work at the local, state, federal, and international levels, and in all types of tax disputes—business tax, personal income tax, sales and use tax, estate and gift tax, international tax, and controversies under international treaties.

We strive to find innovative solutions to seemingly impossible situations. Focusing on developing a sound strategy, we seek to resolve tax disputes successfully without litigation. But when litigation is required, our record is exemplary.

In some instances where the law or interpretive authority has run counter to our clients' interests, we have sought—and in many instances obtained—policy, regulatory, or statutory changes. We often work closely with other advisors, such as in-house counsel or financial advisors, and we can handle as much or as little of a matter as appropriate. Whether the client is an individual or a *Fortune* 500 company, our attorneys can work one-on-one with the client or become a valuable addition to a team of professionals.

Our deep bench of tax attorneys have collective experience in virtually every facet of tax law. We also have attorneys who practice in a full range of other business areas, including corporate and securities, intellectual property and technology, labor and employment, and employee benefits. Our multifaceted approach affords us the opportunity to advocate for our clients from virtually every angle, as tax disputes are rarely just about tax law.

Hodgson Russ attorneys are frequently asked to give presentations for prestigious legal and business organizations. We are very active in the American Bar Association, key positions on the executive committees of the New York State Bar Association and various tax committees, and teach tax courses at major law schools.

We strive to find innovative solutions to seemingly impossible situations and we aim first to resolve tax disputes successfully without litigation.

Hodgson Russ has been awarded prestigious “Best Law Firm” rankings by *Best Lawyers/U.S. News & World Report* in the categories of National Tier 2, Tax Law and Litigation – Tax, Metropolitan Tier 1, Tax Law, and Metropolitan Tier 2, Litigation – Tax.

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Our tax dispute resolution attorneys are on the forefront of the law, writing the books other practitioners read. Recent publications written in whole or in part by our attorneys include:

- “Broadening New York’s Decanting Statute” (*New York Law Journal*)
- *Canadian Tax Highlights* (a monthly publication from the Canadian Tax Foundation)
- *Annual Guidebook to New York Taxes* (CCH)
- A monthly column in *State Tax Notes* (a national publication about state and local tax)
- *The New York Residency & Allocation Audit Handbook* (CCH)
- *Canadian Companion to 1040 Preparation and Planning Guide* (CCH)
- *Practice Advisor* (Lexis Nexis)
- *Contesting New York State Tax Assessments* (New York State Bar Association)
- *2019 Guidebook to New York Taxes* (CCH)
- *New York Residency and Allocation Audit Handbook* (CCH)
- *New York State Sales and Use Tax Answer Book* (CCH)
- *What to Expect in a Sales and Use Tax Audit* (Hodgson Russ)
- *What to Expect in a Residency Audit* (Hodgson Russ)

Visit our website www.hodgsonruss.com for information on how to obtain any of these publications.

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Practice restricted to U.S. law



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