



## Practices & Industries

# Tax

## Overview

### **Tax Advice You Need to Structure Your Deal or to Operate in a Tax-Efficient Manner**

Clients rely on us for advice on the tax aspects of their businesses and personal affairs. Our tax clients include Fortune 500 companies, large private companies, real estate companies, startup ventures and individuals. The firm's Tax lawyers counsel clients in virtually every area of tax law likely to be encountered in their pursuit of business or personal objectives. In doing so, we work closely with lawyers in other practice groups of the firm, including Mergers, Acquisitions and Joint Ventures, Commercial Real Estate and Development Transactions, Individual Clients, and Private Equity and Venture Capital, and Investment Management and Private Funds. For example, our experience with domestic and international private investment funds includes providing advice on all tax issues relating to creation of new funds, structuring of investment entities, acquisitions, restructuring of existing funds, investment activities and exit strategies.

By providing advice, counsel and representation that are practical and cost-effective, we help clients solve tax issues and resolve tax controversies in a thorough and efficient manner.

### **Quality Resolution of Substantive Tax Controversies**

Our attorneys have substantial experience representing clients in tax controversies, including audits, administrative appeals and judicial proceedings in federal and state trial courts and appellate courts. Our approach to every controversy is guided by two fundamental principles: (1) Apply in-depth substantive tax knowledge; and (2) be fully prepared at every level of the controversy. We have the negotiating skills to produce efficient and durable tax closing agreements, private letter rulings or other written understandings that provide guidance and a level of predictability for the client as to the tax exposure and anticipated outcome of business plans.